

**Global Associates**  
**Modern Slavery & Human Trafficking Policy**  
*(Modern Slavery Act 2015 – Section 54 Compliance Statement)*  
**Document Owner:** Chief Executive Officer  
**Approved By:** Senior Management Team  
**Effective Date:** 1 January 2026  
**Review Date:** Annually

## 1. Policy Statement

Global Associates is committed to preventing modern slavery, servitude, forced labour and human trafficking within our operations and supply chain.

We operate a zero-tolerance approach to modern slavery and are committed to acting ethically, transparently and with integrity in all business dealings.

This policy is approved by Senior Management and reviewed annually in accordance with Section 54 of the Modern Slavery Act 2015.

Signed



**Paul Wetherfield**  
Chief Executive  
Global Associates  
2<sup>nd</sup> Jan 2026

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## 2. Our Structure and Supply Chains

Global Associates operates within the UK providing technical and engineering services. Our supply chain includes subcontractors, specialist service providers, equipment suppliers and professional services partners.

We recognise that supply chain risk presents the greatest potential exposure and apply proportionate controls accordingly.

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## 3. Minimum Labour Standards

We prohibit:

- Forced or compulsory labour
- Human trafficking
- Child labour
- Debt bondage
- Withholding of identity documents
- Coercion, threats or exploitation
- Payment below statutory minimum wage

These standards apply to:

- Our directly employed workforce
- Agency workers and contractors
- All suppliers and subcontractors

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## 4. Recruitment and Workforce Controls

We maintain robust recruitment procedures including:

- Right-to-work verification
- Identity confirmation
- Direct payment into personal bank accounts
- Transparent employment contracts
- No recruitment fees charged to workers

Managers are responsible for ensuring compliance within their teams.

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## 5. Supply Chain Due Diligence

We implement proportionate, risk-based supplier due diligence including:

- Pre-qualification questionnaires including human rights criteria
- Risk profiling of suppliers
- Contractual obligations requiring compliance with the Modern Slavery Act

- Right to request evidence of compliance
- Escalation and corrective action processes where concerns arise

We reserve the right to terminate relationships where modern slavery risks are not addressed.

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## 6. Risk Assessment & Management

We assess modern slavery risk based on:

- Nature of services provided
- Labour intensity
- Geographic exposure
- Use of subcontracting
- Industry sector risk indicators

Where elevated risk is identified, enhanced review measures are implemented.

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## 7. Communication & Training

This policy is communicated to all employees and made available to suppliers and clients upon request.

Relevant employees (including management, procurement and HR) receive awareness training to enable them to:

- Recognise signs of modern slavery
- Understand reporting obligations
- Escalate concerns appropriately

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## 8. Reporting & Whistleblowing

Any employee, supplier or third party who suspects modern slavery must report concerns immediately to:

- The Chief Executive; or
- A member of Senior Management

Reports will be treated confidentially. Retaliation against individuals raising concerns in good faith will not be tolerated.

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## 9. Monitoring & Effectiveness

We monitor effectiveness through:

- Annual policy review
- Management oversight meetings
- Supplier assessment reviews

- Internal audits where appropriate

We are committed to continuous improvement in identifying and addressing modern slavery risks.

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## 10. Accountability

The Chief Executive has overall responsibility for ensuring this policy is implemented and monitored. Senior Management is responsible for operational compliance within their areas of responsibility.