

## **Modern Slavery & Human Trafficking Statement For The Financial Year 2022**

This Labour Policy Statement outlines standards to ensure that all employees are treated with respect and dignity, are working under their own free will, and are being properly compensated for their effort. The organisation is committed to upholding the protection of human rights of all workers where it is possible through our sphere of influence. We are committed to ensuring that we are not complicit in any human rights violations and hold our suppliers and partners to this same high standard. GAP supports and respects the principles proclaimed in the Universal Declaration of Human Rights and believes businesses should ensure that they are not complicit in human rights abuses.

### **Freely Chosen Employment**

Debt bondage: Forced, bonded or indentured labour; involuntary prison labour; slavery or trafficking of persons shall not to be used. All work will be voluntary in the delivery of the organisation's services.

### **No Underage Workers**

Child labour is not to be used under any circumstances. All employees must meet the minimum age requirement set by local laws.

### **Minimum Wage, Hours and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Working hours shall be limited to what is acceptable by local laws.

### **Humane Treatment**

There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, slavery, mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment.

### **Our Policies including on Slavery and Human Trafficking**

All employees must be provided with a clear contract of employment, which complies with local legislation.

All employees must be treated in a fair and equal manner and with dignity and respect.

Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependants, religious belief or political opinion, age, trade union activity and offending background should be prohibited.

All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions. Suppliers should observe the provisions of the International Labour Organization such that any young persons under the age of 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development. No young persons may be employed below the age of 16.

All slavery and human trafficking laws must be complied with including, but not limited to, the UK Modern Slavery Act 2015. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

## **Due Diligence Process for Slavery and Human Trafficking**

GAP ensure strict compliance checks are carried for all candidates it supplies. We verify the identity of each worker and their right to work before supply commences.

As part of our commitment to identify and eradicate slavery and human trafficking, we have in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations; such compliance forms part of our contractual relationship with suppliers.

All Gap's employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through the global whistleblowing procedure. GAP is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith will be treated confidentially and without fear of retaliation.

## **Training**

All staff within GAP are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced labour, servitude and slavery.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes GAPs' slavery and human trafficking statement in respect of its 2022 financial year.

## **Your Right to Join (or not to join) a Trade Union**

The organisation will not treat anyone unfairly because they decide to join, decide to leave, refuse to leave or refuse to join a trade union. If the organisation does, you will be able to make a complaint to an industrial tribunal.