

POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. GD Watermark has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

GD Watermark is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. GD Watermark expects the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, GD Watermark includes specific Codes of Conduct and GD Watermark expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and GD Watermark may amend it at any time.

RESPONSIBILITY FOR THE POLICY

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

All parties mentioned above are required to comply with this Policy.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or the Procurement Department as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager or the Procurement Department.

GD Watermark aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. GD Watermark are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

COMMUNICATION AND AWARENESS OF POLICY

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

GD Watermark may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

ASSOCIATED DOCUMENTS

GDW-POL-004 - Bullying and Harassment Policy
GDW-POL-005 - EEO and Anti-Discrimination Policy
GDW-POL-006 - Disciplinary Action Policy