

## Human Rights & Modern Slavery Policy

All company policies cover the subsidiaries of GBE Converge Group Ltd; GB Electronics Ltd, Converge Technology Ltd and GBE Converge B.V

### Introduction

As a global leader in the fire and security and information technology industry, GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V is absolutely committed to ensuring that there is no slavery or human trafficking in any part of our business, and to imposing the same high standards on our suppliers. Our people are expected to act ethically and with integrity at all times, and to raise concerns about our supply chain should any issues arise. Our management are expected to act resolutely to ensure compliance with this policy.

### Organisation's Structure

GB Electronics Ltd & Converge Technology Ltd and GBE Converge b.v are leaders in high performance fire and security, network and IT installations. They deliver high efficiency, cost effective solutions across a broad range of market sectors. To find out more about the nature of the company's business go to [www.gbeconverge.com](http://www.gbeconverge.com)

### Our Supply Chain

The fire and security, network & IT supply chain is a managed supply chain via approved vetted suppliers, they are required to populate PRO006-1 approval form and supply relevant documentation which is reviewed at point of approval. Through ongoing assessment, as documentation expires updated copies are requested and orders cannot be raised until valid certification is supplied. Where an 'approved' contractor is not used for a period of 2yrs, they are automatically removed from the approved listing. Should they wish to continue working with GBE converge they must submit a new PRO006-1 application form along with all supporting certifications etc. This includes products as well as sub-contracted labour and agency workers, noting that agency workers will be employed via an approved contractor business rather than direct employment.

### Supplier Code of Conduct

GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Suppliers must demonstrate that there is no slavery or human trafficking in any part of their business where there is a legal requirement (turnover of £36 million or more) and where there is no legal requirement it is considered best practice that suppliers adhere to this Code of Conduct where they do not have their own. GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V work with suppliers to ensure that they meet the standards of this code of conduct. However, serious violations of GB Electronics Ltd's or Converge Technology Ltd's and GBE Converge B.V supplier code of conduct will lead to the termination of the business relationship.

### Due Diligence

As part of its efforts to monitor and reduce the risk of slavery and/or human trafficking occurring within its supply chains, GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V has adopted the following due diligence procedures when taking on new suppliers, and reviewing its existing suppliers:

- identify and assess the modern slavery and human trafficking risks of each new/existing supplier;
- conduct supplier assessments, with a greater degree of focus on slavery and human trafficking where general risks are identified;
- review on a regular basis all aspects of the supply chain;

- provide adequate protection for whistle-blowers.



## **Other Policies**

On an on-going basis, GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V operates the following policies that describe its approach to the identification of modern slavery risks, and the steps to be taken to prevent modern slavery and human trafficking in its operations.

### **A. Whistleblowing Policy**

GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Employees, customers or others who have concerns can use the confidential helpline 0845 1220 884 and ask to speak to Ian Phelps or Claire Knight.

If our employees believe that there has been a breach of the Modern Slavery Act or have concerns of another business to be in breach of the act, we suggest that they contact the Modern Slavery Helpline on 0800 0121 700.

### **B. Employee Code of Conduct**

GB Electronics Ltd & Converge Technology Ltd's and GBE Converge B.V code makes it clear to employees the actions and behaviour expected of them when representing the Company. GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

### **C. Direct Employees**

GB Electronics Ltd & Converge Technology Ltd and GBE Converge b.v ensures the right to work for all of its direct employees by carrying out security screening to BS 7858 which requires evidence of proof of identity as well as right to work within the UK. All employees are paid the National Minimum wage and Additional Living wage rates as required. Apprentices are paid National Minimum Wage appropriate to the age banding or greater pending the available offer as part of the scheme.

### **D. Controls**

In line with BS 7858, the company uses an approved third party (NSSA, <https://www.7858.co.uk/> ) to complete security screening checks for eligibility and suitability in line with the services we offer to our clients for a period of at least 5years. Pending job role, the employee may also be subject to either a standard DBS or an enhanced DBS. New employees are required to provide at least 2 forms of ID (Taken from List A and List B), which is verified as original copies by either HR and/or the line manager by following the '[3-step process](#)'. Please refer to GBECPF100 Personnel Files Policy and QAP001 Control of Documented information for specifics and retention periods of documentation.

Where potential employees have a time limit or restriction on their right to work i.e: Work Visa, additional checks may be required every 12months or at point of due expiry to confirm their right to work within the UK remains valid.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, GB Electronics Ltd & Converge Technology Ltd and GBE Converge b.v intends to provide access to training for its employees. Through the training programs, employees are encouraged to identify and report any potential breaches of the Company's anti-slavery and human trafficking policy.

## **Further Steps**

GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V is committed to



reviewing the effectiveness of its policies and procedures with regard to combatting slavery and human trafficking. GB Electronics Ltd & Converge Technology Ltd and GBE Converge B.V intends to explore how to measure and assess the management of the risks that are identified.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and in compliance to Sections 15 – 25 of the Immigration, Asylum & Nationality Act 2006

Jason Buttle  
Managing Director

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