

The background of the entire page is a scenic landscape featuring three hot air balloons in flight against a sunset sky. The balloons are colorful, with patterns of yellow, red, and blue. Below them, a range of mountains is visible, with the foreground showing a rocky, forested slope. The sky is filled with soft, golden light from the setting sun, with some clouds catching the light.

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Modern Slavery Statement

Gibson Watts Policies

today's leaders, tomorrow's change

www.gibsonwatts.com



“It is the responsibility of all those who are fortunate enough to have never experienced the heinous reality of modern slavery, to seek to prevent and eradicate it in all its forms. I feel it is my duty as CEO and a pioneer for the future to ensure my business is working hard to safeguard our staff and associates from these evil human rights violations.”

Anne O'Donnell, CEO

Gibson Watts are fully committed to the fight against slavery or human trafficking. We guarantee that all actions are taken to combat modern slavery.

OUR BUSINESS AND SUPPLY CHAINS

Our business is a next generation recruitment consultancy who provide first-class service through our innovative, expert consultants who deliver results to the highest standard.

The Suppliers we work with must not participate in any form of modern slavery or trafficking; they must also ensure compliance throughout the entire supply chain. We require our suppliers to comply with any laws or conventions relating to modern slavery.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

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 in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery. We are committed to continue acting ethically and with integrity in all our business dealings and relationships and to the continued implementation and enforcement of effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We demand the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we 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, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

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

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

RISK ASSESSMENT AND MANAGEMENT

Gibson Watts has formulated an extensive risk assessment process that analyses both country and category risks. This risk assessment process allows our business to ensure a uniform standard of procedural protection against modern slavery in all the jurisdictions in which we conduct business.

Our team continues to review and improve our procedures through regular modern slavery risk assessments. We strive to improve this assessment and ensure the identification of potential modern slavery in our sphere of business.

If a violation is confirmed action is taken as soon as practicable. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a rigorous supply chain compliance programme. Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Human resources.
- Sales.

TRAINING

Training is provided to our staff to ensure a high-level understanding of the risks of modern slavery and human trafficking in our supply chains and our business. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary. We also require our business partners to provide training to their staff and suppliers and providers.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

Continue to ensure our policies are effective against modern slavery.
Continue to use effective training methods to educate all staff.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2021.

An aerial photograph of a two-lane asphalt road with white dashed center lines. To the left of the road is a sandy beach and the clear, turquoise water of a bay. To the right is a dense, lush green forest. A person is walking on the right shoulder of the road. The overall scene is bright and natural.

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