



Policy Against Modern Slavery and Human Trafficking

Gibbs fully supports recent legislative actions around the world to eradicate modern slave and human trafficking. To further this legislation, Gibbs hereby states the following policy is to apply to all aspects of its operations and its global supply chain.

We expect high standards of ethics from all of our contractors, suppliers and other business partners, such that there is no forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children in our supply chain.

We acknowledge and agree that in supplying goods, products and/or services to you that:

We comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force and at all times no less than those standards required by the Modern Slavery Act 2015 (irrespective of turnover); and

We do not and will not engage in any activity, practice or conduct that would constitute an offence under the Modern Slavery Act 2015 regardless of location of the work performed by us;

We include in our contracts and terms with our suppliers anti-slavery and human trafficking provisions that are at least as onerous as those set herein.

We shall implement due diligence procedures for our suppliers, subcontractors and other participants in our supply chains, to ensure that there is no slavery or human trafficking in our supply chains

We will not purchase any products, raw materials or services from suppliers using forced labour in its operations;

We shall not subcontract our anti-slavery obligations r;

We maintain, in the normal course of business, records that will allow us to trace the supply chain of all goods and services provided to customers;

We shall implement a system of training for our employees to ensure compliance with this policy

Certification

We certify that no officers, employees or other persons associated with Gibbs: (i) have been convicted of any offence involving slavery and human trafficking; and (ii) has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.



William J. Torres

By William J. Torres
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