



PREVENTION OF MODERN SLAVERY

PURPOSE

The purpose of this Policy is to specify details of Gold Group approach to fulfilling its commitment to support the elimination of Modern Slavery and fully meet its obligations under the Modern Slavery Act 2015.

The Policy aims to ensure all Gold Group businesses take appropriate steps to confirm their and their suppliers' commitment as we do to the requirements of the Act.

SCOPE

This Policy applies to all businesses in all jurisdictions within the Gold Group Ltd.

The policy applies to third party suppliers with access to Gold Group or client property, systems or data, and any other parties working on behalf of Gold Group

POLICY STATEMENT

Gold Group Ltd is committed to supporting the elimination of acts of Modern Slavery and accordingly we acknowledge The Modern Slavery Act 2015. Within our remit, we encourage others to support the following international standards and as such ask our suppliers to confirm their commitment as we do to the:

- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Core Conventions of the International Labour Organisation

The Board of Gold Group Ltd considers that the adherence with this Act is in line with the Corporate Values and Ethical Code which it promotes to all of the businesses within the Group.

POLICY REQUIREMENT

Employees, contractors, and sub-contractors, forced or compulsory labour is prohibited. Employees should not be forced into involuntary labour and coercion at work is not acceptable. Financial penalty as a disciplinary sanction is prohibited.

The employment models deployed across our Group will be in line with territory specific law and practices.

From 2016 a declaration to confirm support of the Modern Slavery Act 2015 will be contained in our updated supplier contracts and existing suppliers will be required to complete this declaration on renewal.

A robust communications program will be launched in 2016 to ensure all employees and particularly those with procurement responsibility are aware of their responsibilities.

POLICY EXCEPTION

This Policy applies across all workers within its businesses. There is no Exception process for this Policy.

RESPONSIBILITIES

The Company Director is the main board director with primary responsibility for implementing this policy within our wider framework for managing corporate responsibility and for reporting annually to the Company. Pursuant to the Modern Slavery Act 2015 we will update and issue this policy (which for the purposes of the Act should be seen as our Statement) annually to confirm the actions taken to ensure that slavery and human trafficking is not taking place in our supply chain or own businesses.

Gold Group will be required to self-attest on an annual basis their adherence to this Policy and this will be subject to audit and review by Group control functions and/or external auditors.

REPORTING

Subject to the attestation process described above, compliance with this Act will be reported to the Group Risk & Audit Committee annually.

There may be ad-hoc reporting required for UK Government, Corporate Social Responsibility or other agencies and this will be co-ordinated by the policy owners.