

Modern Slavery Statement

1. Foreword

Here at the Gate Capital Group, we are committed to highest standards of ethical and governance arrangements in respect of impartiality, integrity, and objectivity in managing our activities.

We have a zero-tolerance approach to modern slavery, and fully support the UK Government's objectives to eradicate modern slavery and human trafficking. We implicitly follow all government guidelines in this matter and take immense care to ensure our continuing compliance with the Modern Slavery Act 2015.

We encourage all our staff, as part of their training, to take appropriate action if they suspect a case of slavery or human trafficking. We are committed to maintaining best practice and to seeking continuous improvement.

Helen Henderson, People and Resources Director

Neil Hitchens Compliance Officer

January 2023.

2. Our commitments

The Gate Capital Group is committed to protecting and respecting human rights and have a zero-tolerance approach towards modern slavery. We are committed to ensuring that there is no modern slavery and human trafficking in the supply chains or any part of our business. We will refuse to enter into business with any organisation, which knowingly supports, or is found to be involved in slavery, servitude or forced or compulsory labour.

As an equal opportunities' employer, we're also committed to creating and ensuring a non-discriminatory and respectful working environment for our people. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK.

3. Our business and supply chain

The Gate Capital Group is positioned within the Financial Services sector, concentrating mostly on providing a wider range of services to our clients. We engage with a range of third-party providers and suppliers, from SMEs to large corporations, the majority of which are UK based. We pride ourselves in choosing the best possible providers to give our clients the best service possible. Each supplier is tacitly monitored to ensure that they, in turn, follow all aspects of current Antislavery legislation. We will not hesitate to not only cease business with any organisation that is not compliant with all aspects of the Modern Slavery Act but will not hesitate to report them to the authorities where a genuine concern arises.

Whilst we assess ourselves to have an extremely low risk of corporate exposure to modern slavery in our business activity, we acknowledge that electronics, ICT hardware, and service staff are the highest risk areas for us and therefore focus on these appropriately.

4. Our policies

We are fully committed to ensuring we respect human rights and the environment.

The following policies are pertinent to all staff:

- Code of conduct
- Whistleblowing policy
- Bullying and harassment policy
- Diversity and inclusion policy
- Recruitment and selection policy

5. Due diligence within our supply chain

We follow Government guidance and use appropriate measures in our sourcing, supplier onboarding and contract management processes, therefore minimising our exposure to risk. Using such due diligence principles enables us to make a fully considered judgement on all transactions and the integrity of our supply chain.

We aim to build relationships with our suppliers to ensure they comply with our values and that they are aware of our commitment to protect human rights and the environment. As part of our procurement processes, we require all our suppliers to comply with the requirements of the Modern Slavery Act.

6. Risk assessment and management

Following the guidance provided by the Government we continually review our service providers. We currently identify none of our suppliers as displaying characteristics of a higher level of modern slavery risk. Were this to change in the coming year we would issue requests for them to provide further information, to determine whether appropriate policy and processes to identify and manage these risks are in place, and whether the level of due diligence they undertake and protection they afford their supply chain and employees is sufficient. We would also provide input to help mitigate their own supply chain risk and improve their own policy and processes regarding modern slavery, such as, for example, making them aware of the UK Government Modern Slavery Assessment tool, which provides suppliers with tailored good practice recommendations to improve their anti-slavery activity.

Were a supplier to fail to adequately remediate the issue, the relationship would be re-evaluated and if necessary, terminated.

7. Key performance indicators

In the currently unlikely event that potential modern slavery impacts are identified we will work with our suppliers to develop appropriate KPIs to monitor and manage performance regarding these risks.

8. Training on modern slavery and trafficking

All members of staff are required to undertake mandatory modern slavery awareness training as part of their annual CPD processes.