Modern Slavery & Human Trafficking

Policy & Annual Transparency Statement

Policy owner	Managing Director, GMA Air Conditioning
Applies to	All directors, employees, contractors, temporary staff, agents and suppliers of GMA Air Conditioning
Legal basis	UK Modern Slavery Act 2015 (in particular section 54: Transparency in Supply Chains)
Version	2.0
Effective date	23/05/2026
Review cycle	Annual, or sooner if legislation or operations materially change

1. Introduction and policy statement

GMA Air Conditioning ("GMA", "we", "us" or "our") is committed to acting ethically and with integrity in all our business dealings and relationships. We have a zero-tolerance approach to modern slavery, servitude, forced or compulsory labour and human trafficking, whether occurring within our own operations or anywhere in our supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms — slavery, servitude, forced and compulsory labour, debt bondage 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. This policy sets out the steps we take to ensure that modern slavery is not taking place in our business or in our supply chain.

This policy is published in line with section 54 of the UK Modern Slavery Act 2015 and represents both our internal policy and our annual transparency statement.

2. Scope

This policy applies to all persons working for us or on our behalf in any capacity, including:

- employees at all levels, including directors and senior managers;
- agency workers, seconded workers, volunteers, interns, agents and contractors;

- external consultants, third-party representatives and business partners;
- any supplier or sub-contractor providing goods or services to GMA Air Conditioning.

Adherence to this policy is mandatory. Any breach may result in disciplinary action against the individual concerned and/or termination of the commercial relationship with the supplier or partner concerned.

3. Definitions

For the purposes of this policy, the following terms have the meanings ascribed to them by the UK Modern Slavery Act 2015:

- **Slavery:** the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised.
- **Servitude:** an obligation to provide service that is imposed by the use of coercion.
- **Forced or compulsory labour:** all work or service which is exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily.
- **Human trafficking:** arranging or facilitating the travel of another person with a view to that person being exploited.

4. Our business and supply chain

GMA Air Conditioning designs, supplies, installs and services heating, ventilation and air conditioning (HVAC) systems for commercial, industrial and residential clients. Our supply chain includes the manufacturers of HVAC equipment, distributors of components and refrigerants, sub-contracted installation and maintenance engineers, and providers of professional and back-office services.

We recognise that the construction and building-services sector, and certain countries from which HVAC components are sourced, carry an elevated risk of labour exploitation. We therefore apply heightened due diligence in these areas as set out in section 6.

5. Our principles and commitments

GMA Air Conditioning commits to the following principles in order to prevent and address modern slavery in our business and supply chain:

- **Zero tolerance:** we will not tolerate slavery, servitude, forced or compulsory labour or human trafficking in any part of our operations or supply chain.
- **Fair employment:** we will employ all staff in accordance with applicable employment law, pay at least the National Living Wage, and never withhold identity documents or charge recruitment fees.
- **Informed workforce:** we will provide every worker with a written statement of terms before they start work, in a language they understand.
- **Responsible procurement:** we will assess and select suppliers based on their ability and willingness to meet the standards set out in this policy.

- **Continuous improvement:** we will review the effectiveness of the steps we have taken each year and seek to strengthen them.
- **Transparency:** we will publish an annual statement describing the steps we have taken to identify and address modern slavery risks.

6. Supply chain due diligence

We take a risk-based approach to supply chain due diligence. The following measures form part of our ongoing programme:

6.1 Supplier onboarding

- All new suppliers are required to complete a pre-qualification questionnaire covering labour standards, recruitment practices, sub-contracting arrangements and modern slavery controls.
- Suppliers must confirm in writing that they comply with the UK Modern Slavery Act 2015 and equivalent legislation in the territories in which they operate.
- Our standard purchase order terms and supplier contracts contain modern slavery warranties and the right to terminate for breach.

6.2 Risk assessment

- Each supplier is assigned a risk rating (low, medium, high) based on geography, sector, workforce profile and the nature of the goods or services supplied.
- High-risk suppliers are subject to enhanced due diligence, which may include on-site visits, worker interviews, document review and independent audits.
- Risk ratings are reviewed at least annually and whenever a material change to the relationship occurs.

6.3 Ongoing monitoring

- Spot checks are carried out on a sample of suppliers each year to verify continued compliance.
- Engineers and project managers attending supplier or sub-contractor sites are briefed on the indicators of labour exploitation and are required to report any concerns.
- Where non-compliance is identified, we work with the supplier to agree a corrective action plan. We reserve the right to terminate the relationship if remediation is not achieved within an agreed timeframe.

7. Roles and responsibilities

Preventing modern slavery is a shared responsibility. The table below summarises the principal roles:

Role	Responsibility
Board of Directors	Sets the tone from the top, approves this policy and reviews its effectiveness annually.
Managing Director	Acts as the senior owner accountable for compliance with the Modern Slavery Act 2015 and signs the annual transparency statement.
Operations Manager	Ensures supplier due diligence procedures are followed; maintains the supplier risk register.
HR Manager	Verifies right-to-work documentation; investigates concerns raised by staff; oversees training records.
Line managers	Embed this policy in day-to-day operations and ensure their teams complete required training.
All staff and contractors	Read, understand and comply with this policy; report any suspicions of modern slavery via the channels set out in section 9.

8. Training and awareness

We provide training so that everyone working at GMA Air Conditioning understands the risks of modern slavery, recognises the warning signs and knows how to act.

- All new employees receive a modern slavery awareness briefing as part of their induction.
- Staff in procurement, operations, HR and field-based engineering roles complete refresher training at least every 24 months.
- Training covers the legal framework, our policy, how to identify the indicators of labour exploitation (for example: signs that workers are not free to leave, evidence of debt bondage, withheld identity documents, unusual living arrangements at site) and the steps to take if concerns arise.
- Senior managers receive additional training on conducting supplier due diligence and managing remediation.
- Training completion is recorded by HR and reviewed by the Managing Director on an annual basis.

9. Reporting concerns (whistleblowing)

We encourage openness and will support anyone who raises a genuine concern in good faith, even if they turn out to be mistaken. We are committed to ensuring that no person suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of any form is, or may be, taking place.

Concerns can be raised in any of the following ways:

- directly to your line manager;
- to the HR Manager or Operations Manager;
- confidentially to the Managing Director;
- via the Modern Slavery Helpline on 08000 121 700, which is independent of GMA Air Conditioning and operates 24 hours a day;
- in the case of immediate risk to life or safety, by contacting the police on 999.

All reports are taken seriously, investigated promptly and treated as confidentially as possible. Retaliation of any kind against a person who raises a concern in good faith is itself a disciplinary offence under this policy.

10. Monitoring and review

The Managing Director, supported by the Operations Manager and HR Manager, will review the operation of this policy at least once a year. The review will consider:

- the number and outcome of any concerns reported during the year;
- the results of supplier due diligence and audit activity;
- training completion rates;
- any changes to legislation, guidance, or our own operations and supply chain.

Findings from each review will be reported to the Board and will be used to update this policy and to inform our next annual transparency statement.

11. Annual transparency statement

This section constitutes the annual statement made by GMA Air Conditioning pursuant to section 54 of the UK Modern Slavery Act 2015 in respect of the financial year ending [insert financial year-end].

During the reporting period, GMA Air Conditioning has taken the following steps to identify, prevent and mitigate the risk of modern slavery and human trafficking in our business and supply chain:

- **Governance:** reviewed and updated this Modern Slavery & Human Trafficking Policy and obtained Board approval.
- **Risk assessment:** reviewed the modern slavery risk profile of our supplier base and confirmed risk ratings.
- **Due diligence:** required new and renewing suppliers to confirm their compliance with the Modern Slavery Act 2015 and our supplier code of conduct.
- **Training:** delivered modern slavery awareness training to all employees and contractors in scope.
- **Engagement:** maintained active reporting channels and reviewed any concerns raised.
- **Continuous improvement:** identified actions for the coming year, including [insert planned actions].

This statement has been approved by the Board of GMA Air Conditioning and is signed on its behalf by the Managing Director.

12. Approval

Signed:



[Name], Managing Director, GMA Air Conditioning

Date:

23/05/2026