

Anti-Slavery Policy

Glacier Energy Services Holdings Limited (Glacier Energy) and its subsidiary companies recognise that slavery and human trafficking remains an ever-present concern on our global society. Glacier Energy takes its responsibility seriously by alerting staff to the risks, however small, in our business and in the wider supply chain to report concerns immediately to our senior management who are committed to acting ethically and morally.

Company activities are varied through multiple disciplined areas and sectors with a supply chain to support us through the different provisions of our business. We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems to ensure slavery & human trafficking is not taking place in our supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procurement procedures which includes slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

The Company will achieve these aims in (but not limited to) the following ways:

- Stringent vetting and investigation of our supply chain
- Audit & review our practices for checking all employees are paid at least the industry standard and have the right to work in accordance with immigration controls.
- Encourage the reporting of concerns and the protection of whistle blowers.
- The company will not support/engage with any business involved in slavery or human trafficking.
- Zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.
- Provision of suitable and sufficient training at all levels of Glacier Energy on modern slavery and human trafficking in our supply chain and our business undertakings.
- Publishing this Policy on our website for the public, consumers, employees, or investors to view.

The following indicators will be used to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain:

- Completion of Audits by Directors, Managers, Safety Managers & HR Manager
- Use of labour monitoring and payroll systems; and
- Communication and personal contact with approved suppliers for assurances of their understanding and compliance with our expectations with regards to this policy and the Modern Slavery Act 2015.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

This policy statement is endorsed by the Board of Directors and recognises the following signature of authority on their behalf.



Scott Martin
Group CEO



4/11/2020