

Page: 1 of 2	Date: 24.03.16	Reviewed: 31.03.17	Version: 1	Authorised: D. Campbell
--------------	----------------	--------------------	------------	-------------------------

Introduction and Policy Statement

The Modern Slavery Act 2015 (the 'Act') mandates that Green Deal First Ltd prepares a slavery and human trafficking statement each financial year.

Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and many other countries of the world and is a violation of fundamental human rights.

Green Deal First Ltd have a zero-tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity in all activities and business relationships. We expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

Our Business

The economic, social and environmental footprint of our business activity is a fundamental consideration in Green Deal First Ltd's commitment to responsible and sustainable business growth.

Green Deal First Ltd is one of the UK's leading energy management and retrofit companies.

Our supply chains

Our supply chains includes the sourcing of raw materials principally related to the provision of Construction and renovation services, including Energy Efficiency Measure installation.

Responsibility For The Policy

The Directors and senior management team of Green Deal First Ltd have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf in any capacity comply with it.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our employees, suppliers, workers, directors, agents, distributors and all third party business partners)

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

Policy

Where possible the company will build long standing relationships with local suppliers and make clear our expectations of business behaviour; With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for Green Deal First Ltd (and every other participant in the chain) to have a direct relationship with all links in the supply chain, ultimately to the field or utility generator. We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Commitment

Green Deal First Ltd are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains

Training

Training on this policy and the risk our business faces from Modern Slavery and Human Trafficking forms part of the induction process for all individuals joining the business and internal training is provided for all existing staff employed in a purchasing function. Regular refresher training will be provided as required.

The issues surrounding Modern Slavery and Human Trafficking have been added to the Green Deal First Ltd Handbook which is available to all employees.

The Thrift Energy Purchase policy & procedures have been amended to encompass Modern Slavery and Human Trafficking and copies are available to our suppliers on request.

Compliance

All persons working for us or on our behalf in any capacity must:

read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy;

Notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future; and

Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

Breaches Of Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Ongoing Review

Green Deal First Ltd will review both its supply chains and external operations; as well as its internal operations on an ongoing basis to check compliance with the above policy, and to check that our policy is being implemented effectively



Derek Campbell
Managing Director