

Greenbeam Modern Slavery Policy

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1.0 Policy Overview

Greenbeam is committed to operating responsibly and ethically, upholding the highest standards of human rights, and complying with all relevant laws and regulations regarding modern slavery and human trafficking. This policy outlines our approach to preventing and addressing modern slavery within our operations and supply chains, in accordance with international standards such as the Modern Slavery Act 2015 and the UN Guiding Principles on Business and Human Rights.

2.0 Definitions

Modern slavery encompasses various severe forms of exploitation, including:

- Slavery: The exercise of ownership over a person.
- Servitude: The obligation to provide services is imposed through coercion.
- Forced or compulsory labour: Work or service performed involuntarily and under the threat of force or penalty.
- Human trafficking: Arranging or facilitating the travel of another person with the intent to exploit them.

These forms of exploitation all involve one party depriving another of their freedom to exploit them for personal or commercial gain.

3.0 Signs of Modern Slavery

Modern slavery can be difficult to detect. However, potential signs might include:

- Evident restriction of movement, travel, or confinement to a specific area.

- Fearful, anxious, or submissive behaviour, especially in the presence of others.
- Discrepancies between the job being performed, the working conditions, and what their contract states.
- The inability to produce identity or travel documents, or these documents being held by someone else.
- Inability or unwillingness to give an address or details about who they live with.

4.0 Policy Implementation

The executive team is responsible for the overall implementation of this policy, while the Senior Leadership Team ensures all team members are aware and trained on this policy. Specific roles and responsibilities are assigned to relevant departments to monitor compliance and address any issues related to modern slavery

5.0 Risk Based Approach

We conduct regular risk assessments and supplier audits to identify and mitigate the risks of modern slavery. This includes annual reviews and random audits of high-risk suppliers. We engage with suppliers and sub-contractors who share our commitment to human rights and take active steps to prevent modern slavery within their operations.

6.0 Employee Expectations

All our staff are expected to remain vigilant and report any reasonable suspicions of modern slavery practices within our partner organisations. We encourage staff to raise their concerns even if they are uncertain. It is essential to note that 'reasonable suspicion' does not require definitive proof but rather a belief based on reasonable grounds that a situation of modern slavery exists.

7.0 Reporting Mechanisms

We promote an environment of openness within our company. We encourage all our staff, customers, and other business partners to voice any concerns related to possible breaches of this policy in our direct activities or supply chains.

8.0 Reporting Process for Modern Slavery Concerns

8.1 Channels for Reporting

We provide an avenue to report suspicions of modern slavery, ensuring accessibility and confidentiality. These include a dedicated email address for reporting modern slavery concerns (people.culture@Greenbeam.com).

For external stakeholders, such as suppliers or customers, reports can be made directly to their Account Manager or to our People and Culture team on the above email.

8.2 Process for Reporting

Any individual who suspects instances of modern slavery in any part of our operations or supply chain should report it immediately using any of the above channels.

The report should include, where possible, details about the nature of the suspected slavery, the individuals involved, and any other relevant information that could assist in an investigation.

8.3 Response to Reports

All reports will be taken seriously and investigated promptly and thoroughly by a dedicated team. The confidentiality and anonymity of the person reporting will be respected to the fullest extent possible.

8.4 Protection for Whistleblowers

We are committed to ensuring that no individual suffers any detrimental treatment as a result of reporting a suspicion of modern slavery in good faith. Retaliation against employees or other individuals who have reported concerns in good faith is strictly prohibited.

8.5 Follow-Up and Feedback

We will provide feedback to the individual who raised the concern, where appropriate and possible, regarding the outcome of any investigation. If required, we will take appropriate action against individuals or organisations found to be involved in modern slavery.

8.6 Training and Awareness

Regular training will be provided to all employees on how to recognise and report modern slavery. We will also raise awareness about this reporting process through internal communication channels.

8.7 Record Keeping

A record of all reports made under this procedure will be maintained securely and confidentially.

8.8 Continuous Improvement

We will regularly review the effectiveness of our reporting mechanism and make improvements as necessary.

9.0 Supplier Selection and Due Diligence

9.1 Supplier Assessment Criteria

Suppliers are assessed on their commitment to human rights and anti-slavery principles. This includes evaluating their policies, practices, and track record in these areas. We prioritise suppliers who have clear, enforceable policies against modern slavery and human trafficking.

9.2 Due Diligence Process

Before engaging with a new supplier, we conduct due diligence, which includes:

- A review of the supplier's own modern slavery policy.
- An assessment of their practices and procedures related to labour rights and working conditions.
- Checks for any past incidents or allegations of modern slavery associated with the supplier.

We may also include site visits, third-party audits, or consultations with local NGOs knowledgeable about local labour practices.

9.3 Supplier Agreements

Our contracts with suppliers include specific clauses obligating them to comply with our Modern Slavery Policy and all applicable laws and regulations related to modern slavery and human trafficking. Suppliers are required to extend these obligations to their own supply chains.

9.4 Ongoing Monitoring and Evaluation

We regularly review our suppliers' compliance with our policy. This may involve periodic audits, reviews of compliance certifications, or direct engagements. Suppliers found to be in violation of our policy are subject to actions that may include remediation plans or termination of the business relationship.

10.0 Policy Review

This policy will be reviewed annually and updated as necessary to ensure its continued relevance and effectiveness. Feedback from internal and external stakeholders will be incorporated to enhance our approach to addressing modern slavery.