

# MODERN SLAVERY POLICY STATEMENT

## Anti-Slavery and Human Trafficking statement for the financial year ending August 2022

This policy is reviewed annually at a minimum. The review period is usually August - at the end of the financial year. The GMD Modern Slavery Policy Statement is also available at <https://globalminedesign.com>.

The person responsible for the GMD Modern Slavery Policy is Philip Earl, Technical Director.

**Note that this is a controlled document.** Electronic copies posted on the external company webpage, the internal company intranet, and at GMD office reception are the only controlled copies. Any other copies are not controlled and should not be relied upon.

### A) ORGANISATION

This statement applies to Global Mine Design Ltd (GMD). GMD is not required to make this statement pursuant to Section 54(1) of the Modern Slavery Act 2015 but does so willingly and as if that section did apply.

GMD is headquartered in Cornwall, UK and provides a complete range of mine engineering and design services to international mining companies. The company has less than ten employees and a turnover of less than the £36m threshold above which anti-slavery and human trafficking statements are required by law.

### B) COMMITMENT & DUE DILIGENCE

GMD is a consultancy company and therefore not directly involved in the extraction of minerals from ore-bearing rocks, nevertheless, we recognise that the mining and extraction industries are amongst the highest-risk industries for potential modern slavery situations. Mining is a high-risk industry for modern slavery situations because of the potential for persons to be employed in conditions that do not meet appropriate working standards or who may be exposed, even inadvertently, to hazardous work. We also acknowledge the potential risk of modern slavery by mining personnel engaging with exploited people in a local community for services, such as domestic or sex work.

GMD has committed to implementing and enforcing its own anti-slavery and human trafficking policy since 2018, in order to support essential aspects of human rights and to show best-practice within the mining industry. GMD strictly adheres to UK employment legislation and our policies require an ongoing review of internal practices, particularly with respect to hiring employees and insisting upon minimum work standards for its employees when they attend client sites. We also actively manage modern slavery activity within our supply chain.

GMD will not knowingly support or deal with any business involved in slavery, servitude and/or forced or compulsory labour. We reserve the right not to work with a client who we subsequently learn is involved in any form of modern slavery. We first began reviewing our client's modern slavery statements in 2018 and, to date, we are pleased that all our clients place annual statements on their webpage that comply with either the United Nations Guiding Principles (UNGP) on Business and Human Rights 2011, the UK Modern Slavery Act 2015 and/or the Australian Modern Slavery Act 2018.

In addition, the countries that we currently work in are all classified as at low risk of modern slavery, according to the Global Slavery Index ([www.globalslaveryindex.com](http://www.globalslaveryindex.com)). We recognise that the rating of future client sites may change and as such we review all the countries that we operate in on an annual basis to verify their index rating.



## C) SUPPLY CHAIN

In line with the definitions used in the UNGP, we recognise that we could be inadvertently linked to modern slavery in our supply chain through our choice of supplier. We endeavour to use only suppliers who willingly display good practices with respect to Human Rights. The majority of our key suppliers are providers of complimentary services or products, such as travel operators and software developers and vendors. As such, these companies are not directly linked to GMD business activities, but we use their products and services in order to deliver our own business. Our reviews show that the companies we tend to use are large enough to trigger the turnover threshold and so are required to publish a Modern Slavery Statement that we can review for our own purpose.

From time to time we may also use contract employees to assist directly in our business activities. We tend to form long-term relationships with our contract workforce. While working for GMD they are required to adhere to all GMD policies, including our modern slavery policy, which addresses the potential risks - particularly those relating to local communities. Other key GMD Human Resources policies include code of conduct and anti-bribery. GMD employees and contractors face dismissal for contravening these policies.

## D) POTENTIAL EXPOSURE

On the basis of the ongoing reviews of business practices, GMD considers its core business exposure to modern slavery and human trafficking to be limited. We have taken measures to minimise the likelihood of such practices taking place in our business. To the best of our knowledge, we have not conducted any business with another organisation that has been found to have involved itself in modern slavery.

## E) COMPLIANCE MEASURES

In accordance with section 54 (4) of the Modern Slavery Act 2015, GMD undertakes self-compliance measures to minimise the likelihood of being involved with modern slavery. Our measures include:

- Complying with legislation and regulatory requirements.
- Making suppliers and service providers aware that we promote the requirements of this legislation.
- Introducing modern slavery investigative factors for procurement, recruitment, and client work projects.
- Developing awareness of modern slavery within company policies, such as code of conduct, anti-bribery etc.

In accordance with Section 54 (1) of the Modern Slavery Act 2015, this statement is reviewed annually at the end of each financial year. As part of the procedural update, we also include a review of our supplier and client lists to determine if they have changed any aspect of their modern slavery commitments. If we are not completely confident of their position, we reserve the right as a company to find alternative suppliers and/or decline working with clients.

## F) CONTACT

Any questions or comments regarding this policy can be directed to GMD's Privacy Controller at [privacy@globalminedesign.com](mailto:privacy@globalminedesign.com). According to General Data Protection Regulation (GDPR), our Privacy Controller will ensure that your message is managed correctly.

GMD has made voluntary Modern Slavery Statements since 2018. Earlier statements are available on request.

