



## GIST MODERN SLAVERY STATEMENT 2018

This statement is published in accordance with Section 54 of The Modern Slavery Act (2015). It sets out the steps taken during the year ending 31 December 2018 by Gist Limited (“Gist”) to ensure that no form of modern slavery takes place in its business operations and supply chains.

Slavery, servitude, forced labour and human trafficking (modern slavery) are issues of increasing global concern, Gist requires its supply chain partners’ and contractors to comply with its values. Gist’s managers and employees are expected to report concerns, using the appropriate reporting channels, and our senior leaders are expected to act upon them.



**IN MORE THAN  
30 LOCATIONS**  
IN THE UK, CONTINENTAL EUROPE  
AND THE USA



**MORE THAN  
5,000  
EMPLOYEES**



**1,000+  
CUSTOMERS**

### OUR BUSINESS

Gist is a leading UK supply chain company with 5,000+ employees. Gist operates internationally from more than 30 locations in the UK, Continental Europe and the USA, with its head office in Basingstoke and works with more than 1,000 customers whose supply chains are extensive and global.

Following the merger of Praxair Inc., and Linde A.G., on 31 October 2018, Gist became a member of the new Linde plc group with combined pro forma sales for 2018 of approximately USD 28 billion, with circa 80,000 employees’ worldwide serving customers in more than 100 countries..

### SUPPLY CHAIN PARTNERS’ AND CONTRACTORS

Gist adheres to high standards within every aspect of its business and requires all of its partners to share its ethical business practices. As part of the standard procurement process, Gist’s suppliers are required to commit to its ‘Code of Conduct for Suppliers’, which explicitly details non-tolerance of human trafficking or slave labour in any form. All new contracts contain specific reference to modern slavery and Gist will only work with suppliers that commit to meeting these required standards.

Each of Gist’s suppliers have signed up to terms & conditions that requires compliance with the ‘Code of Conduct for Suppliers’.

### POLICIES AND CONTRACTUAL CONTROLS

Gist has a number of policies in place that fully support the Modern Slavery Act, all of which are endorsed by Gist’s Chief Executive and Board of Directors and are integrated into business practices.

Gist’s main operational policy for the protection of and respect for all those who work on behalf of Gist is provided for by the Code of Ethics. The Code of Ethics details the standards of integrity and ethical conduct in relation to all employees, shareholders, local communities and the public, as well as customers, suppliers and markets. The Code of Ethics covers 15 subject matters, including human rights and fair treatment. All Gist’s employees receive training on the Code of Ethics.

### INTEGRITY LINE

Our Integrity Line has been designed to handle any concerns raised in relation to the application of the Code of Ethics. It provides an additional channel for both employees and third parties to report potential irregularities. Gist will not tolerate, and strictly prohibits, retaliation against those who raise concerns.

Other policies relevant to preventing modern slavery include our Human Rights Policy. The Human Rights Policy outlines Gist's support of both the right to freedom from servitude and the right to freedom of movement. Gist seeks to ensure that we do not participate in, or benefit directly or indirectly from, any form of forced labour or bonded labour - including debt bondage, forced prison labour, slavery, servitude or human trafficking.

As part of our constant drive for continuous improvement, Gist reviews all of its policies and processes on an ongoing basis, and will continue to do so in relation to this area.

### **DUE DILIGENCE AND AUDITS OF SUPPLY CHAINS AND CONTRACTORS**

Senior managers in our Procurement, Human Resources and Business Assurance departments have been appointed as sponsors for designing and monitoring processes and procedures to reduce the risk of Modern Slavery. This includes the introduction of a Modern Slavery audit template and associated protocol, which will assess adherence to the Modern Slavery Act within Gist and by its suppliers. Gist's Modern Slavery audit template has been fully integrated into its internal audit practices, through the Integrated Management System ("IMS").

Gist has undertaken the following activities during the year to minimise the risk of Modern Slavery:

- a review of our supplier websites to ensure Modern Slavery statements have been published and describe the actions they have taken within their organisations to reduce the risks in this area;

- a series of paper-based audits of key suppliers to assess their compliance with Gist's business standards associated with Modern Slavery, including: Human Rights, Wages &

Benefits, Non-Discrimination & Fairness and No forced Adult or Child Labour; and

a schedule of on-premises audits at Gist's key suppliers representing more than one third of our total supplier spend has been arranged. These audits, due to take place early 2019, are designed to assess working environments and policies, procedures and practises associated with Modern Slavery.

These activities assess compliance with the Code of Conduct for Suppliers and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken to work collaboratively to reduce these potential risks.

### **ASSESSMENT OF MODERN SLAVERY RISK**

During 2018, Gist has increased its focus on Modern Slavery within the wider business operations and in partnership with our supply chain and suppliers. The development and implementation of a risk assessment register in 2019 will detail areas of potential risk within Gist and our suppliers, leading to the formulation of a plan to combat any risk identified.

An ongoing monitoring and verification process will form part of our regular, formal Management Information to Gist Board members.

### **TRAINING**

Gist continues to train and assess all new employees and third party agency employees on the Code of Ethics, running regular refresher training and assessment for existing employees.

Signed on behalf of the Gist Board



**Martin Gwynn**  
Chief Executive Officer

## **GIST'S BUSINESS OPERATIONS**



### **CONTRACT LOGISTICS**



### **TEMPERATURE CONTROLLED LOGISTICS**



### **INTERNATIONAL**



### **FOOD SERVICE**