



# TRANSFORMING SUPPLY CHAINS

CUSTOMER PARTNERSHIP EXCELLENCE INNOVATION PEOPLE

## MODERN SLAVERY STATEMENT 2019

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 2019 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.

### OUR BUSINESS

Gist is a leading UK supply chain company with 5,500+ 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.

Gist is a member of the Linde plc group with combined pro forma sales for 2019 of just over USD 28 billion, with circa 80,000 employees' worldwide serving customers in more than 80 countries.

We continue to work hard to identify actual or potential risks of modern slavery and ensure processes are implemented to compliment independent living. Risks of modern slavery are fluid and can change quickly. We regularly reassess and respond to the potential and actual risks in our business to combat these.

### SUPPLY CHAINS 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 and conditions that require compliance with the Code of Conduct for Suppliers.



### INTEGRITY LINE:

Our Integrity Line has been designed to handle any concerns raised in relation to the application of the Code of Business Integrity. 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.

## 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 Linde Code of Business Integrity. The Code of Business Integrity 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 Business Integrity covers 15 subject matters, including human rights and fair treatment. All Gist's employees receive training on the Code of Business Integrity. 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.

## DUE DILIGENCE AND AUDITS OF SUPPLY CHAINS AND CONTRACTORS

As part of our constant drive for continuous improvement, senior managers in our Procurement, Human Resources and Business Assurance departments are sponsors for the design and review of processes and procedures to reduce the risk of Modern Slavery. These procedures include a Modern Slavery audit template and associated protocol, which assesses adherence to the Modern Slavery Act within Gist and by its suppliers. Gist's Modern Slavery audit template is 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 number of on-premise audits at Gist's key suppliers representing more than one third of our total supplier spend have taken place. These audits assessed working environments and policies, procedures and practises associated with Modern Slavery. These audits have developed an ever closer relationship with these suppliers and a better understanding and awareness of the associated risk areas in their supply chains.

- A risk assessment of all suppliers has taken place and those presenting the greatest risk of modern slavery were required to provide their statements and an understanding of the work in combatting Modern Slavery. We continue to work in partnership with these companies in reducing associated risks.
- Gist has also worked in conjunction with the Gangmasters and Labour Abuse Authority (GLAA) to upskill the HR teams on the challenges and opportunities that present themselves with Modern Slavery. This information has been used to create a set of robust monthly checks to review and monitor the personal independence of our employees.

## ONGOING ASSESSMENT OF THE MODERN SLAVERY RISK

- Our ongoing monitoring and verification process forms part of our regular, formal Management Information to Gist Board members.
- All such activities assess our suppliers' compliance with the Code of Conduct for Suppliers and any Modern Slavery practices are identified. If any issues are identified, appropriate investigative and remedial actions will be taken to work collaboratively to reduce these potential risks.
- We will continue to review and monitor the ever-changing face of Modern Slavery, establishing ways in which it can be reduced and ultimately eliminated.

## Training

- Gist continues to train and assess all new employees and third party agency workers on the Code of Business Integrity, running regular refresher training and assessment for all existing employees. Further awareness campaigns and briefing sessions have been designed and will take place in 2020.

Signed on behalf of the Gist Board



**Martin Gwynn**  
Chief Executive Officer

