

Modern Day Slavery and Human Trafficking Policy 2025

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### **Garrison Dales Ltd**

Effective Date: 03/01/2025

### 1. Introduction

At Garrison Dales Ltd, we are committed to upholding the highest standards of ethical conduct across all aspects of our business. We take a zero-tolerance approach to modern day slavery and human trafficking and are fully committed to preventing slavery and human rights abuses in our operations and supply chains.

This policy outlines our commitment and the steps we take to ensure compliance with the Modern Slavery Act 2015.

#### 2. Our Business

Garrison Dales is a UK-based importer and wholesaler of quality industrial tools and consumables, supplying both retail and trade customers nationwide. Our supply chain includes national and international manufacturers and distributors of tools, workwear, and industrial consumables.

### 3. Our Commitment

We are committed to:

- Acting ethically and with integrity in all business relationships.
- Implementing and enforcing effective systems and controls to prevent modern slavery.
- Ensuring transparency within our own business and throughout our supply chain.

## 4. Identifying, Assessing & Mitigating Risk

To proactively prevent modern day slavery, we have put in place the following measures:

Supplier Assessments: We carry out initial checks on all suppliers before
entering a business relationship, including ethical and labour practice
reviews.





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- **Supplier Audits**: Where appropriate, we conduct site visits or request audit reports to verify working conditions and compliance with applicable laws.
- **Regular Reviews**: We regularly reassess key suppliers to ensure continued adherence to ethical standards and monitor for any red flags or changes in risk status.
- Risk Mapping: We identify and prioritise higher-risk regions, industries, or supplier types within our supply chain and take proportionate action accordingly.

These steps help us to maintain accountability throughout the supply chain and ensure that we work only with partners who align with our values.

# 5. Our Supply Chain and Due Diligence

We work with a wide range of suppliers, including international manufacturers. We aim to build long-term relationships with partners who share our values. To mitigate the risk of modern slavery in our supply chain, we:

- Conduct supplier assessments and reviews.
- Expect suppliers to comply with all relevant labour and human rights laws.
- Include modern slavery clauses in supplier agreements where appropriate.
- Reserve the right to terminate contracts with suppliers found in breach of this policy.

## 6. Employee Awareness and Responsibility

All employees are expected to:

- Familiarise themselves with this policy.
- Report any concerns related to modern slavery or unethical behaviour.

Managers are responsible for ensuring that their teams understand and follow the policy and for escalating any potential risks or breaches.

### 7. Reporting Concerns

We encourage a culture of openness and accountability. If employees, suppliers, or stakeholders suspect any instance of modern slavery, they are encouraged to report it immediately to management or via our confidential reporting procedures.





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# 8. Continuous Improvement

We are committed to continuously improving our practices to identify and mitigate risks related to modern slavery. This policy will be reviewed annually and updated as needed to reflect changes in legislation or business operations.

# 9. Approval

This policy has been approved by the Paul Allart, the director of Garrison Dales Ltd and is supported at the highest level of our organisation.

For questions or to report concerns regarding this policy, please contact: marketing@garrisondales.co.uk
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