

GEM Enterprise

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Modern Slavery Statement

Date:
January 2026



G **GEM** ENTERPRISE

Introduction: Modern slavery is a heinous crime and a violation of fundamental human rights, encompassing various forms of coercion and exploitation such as slavery, servitude, forced or compulsory labour, and human trafficking. Our company is committed to acting ethically and with integrity in all our business dealings. Although we are a small enterprise, we take our responsibility seriously to ensure that modern slavery and human trafficking have no place in our business or supply chains. This Modern Slavery Statement is made in accordance with the principles of the UK Modern Slavery Act 2015. Although our size may not legally require us to publish a formal statement under Section 54 of that Act, we voluntarily uphold its intent and fully commit to its objectives.

Our Commitment: We have a zero-tolerance approach to modern slavery and human trafficking. We are fully committed to the principles of the Modern Slavery Act 2015; namely, that no one should be held in slavery or subjected to forced labour, and that trafficking and exploitation are completely unacceptable. We strive to act transparently, ethically, and responsibly in all aspects of our business to safeguard against any form of modern slavery taking place within our organisation or in our supply chain. We will not knowingly support or do business with any individual or organisation involved in slavery, human trafficking, or any other forced labour.

Our Business and Supply Chain: Our company offers consulting services, and our supply chain is relatively straightforward, primarily comprising office suppliers and professional services within the UK. Given the nature of our business (primarily service-oriented with minimal physical supply chain), we assess our direct risk of modern slavery to be low. However, we acknowledge that no sector or supply chain can be considered immune to the risk. We are vigilant in our procurement and outsourcing: we expect our suppliers, contractors, and business partners to share our values and to operate in full compliance with the Modern Slavery Act 2015 and all applicable labour laws. We communicate to our key suppliers that we are an equal opportunity employer and that we oppose any form of exploitation. When engaging new suppliers or partners, especially those in industries or countries with a higher risk of labour exploitation, we will conduct thorough due diligence. This may include inquiries into their labour practices, requesting copies of their own Modern Slavery Statements (if applicable), or requiring contract clauses affirming their commitment to ethical labour standards.

Internal Practices: Within our own organisation, even as a small employer, we take steps to ensure there is no forced labour or exploitation in our operations. We are an equal opportunities employer and are committed to providing a non-discriminatory and respectful working environment. All our employees and contractors must have the legal right to work, and we conduct appropriate checks (such as verifying identity and work authorisations) to prevent any human trafficking victims from being unknowingly employed. We ensure that all employment is voluntary: no one is forced to work for us under threat of any penalty or coercion. Staff are free to leave in accordance with agreed notice periods, and we do not retain any worker's identity papers or valuable possessions. We also ensure that workers are treated with dignity and respect, work in safe conditions, and receive fair remuneration and benefits in compliance with minimum wage and working time laws. Any form of harsh or inhumane treatment, harassment, or intimidation in the workplace is strictly forbidden.

Training and Awareness: We recognise the importance of education in combating modern slavery. We provide information to our team about what modern slavery and human trafficking are, how to spot potential signs, and to remain vigilant, especially if their role involves managing supply chain relationships. Although our resources are limited, we may utilise available free training materials or guidance (for example, from the UK Home Office or anti-slavery organisations) to raise awareness internally. We encourage a culture of transparency

and openness, so that if any employee suspects any instance of modern slavery, whether in our business or in a supplier's business, they can report it immediately without fear of retaliation. We have established a process (or point of contact, e.g. a manager or confidential email) for reporting any such concerns. All reports will be taken seriously and investigated, and if warranted, we will alert the relevant authorities. We actively support and encourage our employees to report any concerns related to slavery or human trafficking in any parts of our business or supply chains.

Continuous Improvement and Monitoring: We recognise that combating modern slavery is an ongoing and multifaceted effort. We will review the effectiveness of the steps we are taking to ensure there is no slavery or trafficking in our business. This includes reviewing feedback from employees or stakeholders, staying updated on best practices and guidance for small businesses in tackling modern slavery, and monitoring our supply chain relationships. As our company grows or our supply chain evolves, we will assess any new risks and enhance our measures accordingly. Suppose any weaknesses are identified (for example, a lack of visibility into a certain supplier's labour practices). In that case, we will address them, perhaps by seeking more information or choosing alternative, more transparent suppliers.

Policies and Related Documents: This statement is supported by related company policies that reflect our commitment to ethical business conduct, such as our Equal Opportunity & Diversity Policy (which underlines fair treatment of workers), our Anti-Bribery Policy (emphasising integrity), and any Whistleblowing Policy (to protect those who report wrongdoing). Together, these policies create a framework that guards against unethical practices and promotes a culture of speaking up for any concerns, including those related to human rights abuses.

Approval and Publication: This Modern Slavery Statement is approved by the Director of the company and will be reviewed and updated on an annual basis. It will be publicly available (for example, posted on our company website or provided to clients upon request) to communicate our stance and actions against modern slavery and human trafficking.

By making this statement, our company affirms our commitment to preventing modern slavery in our organisation and supply chain, and to playing our part in the global efforts to eradicate these abhorrent practices. We understand that combating modern slavery is not a one-time task but a continuous duty, and we pledge to remain vigilant and proactive in this endeavour.

Signed: 

Name: Mr Mansour Miralami

Position: Director / Principal Structural Engineer

Date: 15/01/2026