

CSR-Ethical Business Policy Statement: 2023-2024

Introduction: General Panel Systems Ltd and GPS Links Ltd provide control and automation systems for process industries, employing a skilled engineering workforce across mechanical and electrical design, manufacturing, software, test and systems integration disciplines.

Operating under a single SHEQ management system comprising ISO 45001, 14001 and 9001, both companies comply with all relevant legislation, regulation, and industry standards; operate to high standards of business ethics concerning safety, quality and transparency; and live up to their social responsibilities in terms of respect for people and the environment.

Anti-Bribery - GPS complies with the Bribery Act 2010 and does not offer or accept any form of inducement including financial payments, gifts or hospitality.

Anti-Slavery and Child Labour - GPS is not required to produce a formal anti-slavery statement but is mindful of the Modern Slavery Act 2015 and child exploitation in relation to contract labour in the supply chain. GPS does not subcontract labour.

Data Protection and Privacy – GPS complies with the Data Protection Act 1998 and GDPR regulations 2018 concerning security and processing of personal data.

Disclosure – GPS encourages all employees to report any unsafe, unlawful, unethical or unreasonable behaviours, and follows whistleblowing guidelines to ensure that information is treated as confidential, and identities are protected, including complaints that may be lodged with external organisations and authorities.

Environmental reporting – GPS is not required to report its carbon footprint, but measures carbon output as far as is reasonably practicable and seeks to improve its environmental performance wherever possible.

Equality and Discrimination - GPS complies with all Equality and Discrimination regulations to provide employment terms and a workplace environment based on fairness and equality, which does not discriminate on any basis, and does not tolerate any form of harassment or abuse.

Ethical Sourcing – GPS requires that suppliers demonstrate responsible practices and suitable SHEQ certification to be approved as a supplier.

Right to work – GPS complies with the Immigration Asylum and Nationality Act 2006 and conducts pre-employment screening to ensure compliance.

Prevention of tax and accounting fraud – GPS maintains strict access and authorisation procedures and accounting checks to prevent tax or financial fraud.

Policy detail: bribery slavery and right to work

GPS is mindful of the scale and gravity of bribery, slavery, and right to work issues that exist in the construction / M&E supply chain in the UK, as well as child labour in the global market.

As an SME manufacturer with a turnover of less than £36 million GPS is not required to publish a modern slavery report, our priority is to manage internal risks, which are assessed against government guidelines and mitigated to a large extent by the compliance requirements of our customers and external audit bodies.

Our procedures are informed by the following guidelines:

- Ministry of Justice: The Bribery Act 2010
- Home Office: Slavery and human trafficking in supply chains. Guide for business
- Home Office: An employer's guide to right to work checks

GPS provides appropriate instruction for personnel in roles that may be exposed to any level of bribery or corruption, including procurement and sales, and monitors the incidence or observation of any such acts under its ISO 9001 internal audit procedure.

Policies and procedures are communicated to all employees via inductions, the staff handbook and notice boards, and externally via the company web-site.

Suppliers are required to provide evidence of SHEQ certification and ethical standards to become an approved supplier. GPS does not audit suppliers 'specified' by customers and therefore pre-approved, or a supply chain comprising multi-national component manufacturers which is self-evidently beyond the resources of the company.

GPS audits for cause, where there is a perceived risk or irregularity, the likelihood of which is low based on the guidance for a company that is...

- A purchaser of goods, not services, within the UK
- Does not employ sub-contract labour
- Is in full control of its employment procedures in relation to contracts of employment, identity, background and right to work checks
- Operates a supplier approval and monitoring process
- Is externally audited under its ISO 9001, ISO 45001 and Achilles UVDB certification



Nigel Harrison Managing Director of GPS and GPS Links: 4 May 2023