



GBG Modern Slavery Statement

September 2019



INTRODUCTION

Modern slavery and human trafficking are acknowledged to be global problems. The Global Slavery Index estimated in 2016 that globally, over 40 million people live in some form of modern slavery.

Slavery and human trafficking can take many forms, but in very general terms "slavery" is where ownership is exercised over a person, where individuals are coerced into providing their services or do so under threat of a penalty. "Human trafficking" covers arranging or facilitating the travel of individuals with a view to exploiting them.

We recognise that all businesses have a key role to play in preventing all types of modern slavery in their own business and supply chains through the promotion of ethical business practices and policies.

At GBG, we are committed to improving our practices to ensure that slavery and human trafficking are not taking place in any part of our business or supply chain. We expect the same commitment from our suppliers, contractors and business partners.

GBG'S ORGANISATIONAL STRUCTURE

GB Group PLC ('GBG') and its subsidiaries (together 'the Group') is a global provider of identity data intelligence services with operations across Europe, North America and Asia Pacific. GBG helps organisations recognise and verify all elements of an individual's identity at key interactions in their business processes. Through the application of our proprietary technology, our vision is to inform business decisions between people and organisations globally.

OUR BUSINESS

GBG provides a number of business solutions aimed at informing decisions about customers or employees in key areas:

Employing people – thorough background checks through the online verification of individuals and key documents such as a driver's licence, enabling organisations to safeguard, recruit and engage with confidence.

Registering identities – facilitating the registration of identity data, such as name and address, contact information and social network IDs, quickly and with minimum impact on the customer experience.

Verifying identities – providing more innovative ways of confirming identity than simply relying on credit data. Our solutions check the identities of more than 4 billion people worldwide and also verify citizens of the world's largest economies to the rigorous standards set by the world's financial regulators.

Building relationships – working collaboratively with clients to make sure they use the data their customers share with them to create personalised customer journeys for each individual, responding to every interaction in real time.

Fighting fraud – fraud prevention solutions not only check new customer details in real time as they register but monitor and detect application and transaction fraud on an ongoing basis.

Locating people – GBG's technology confirms and locates the people our clients need to connect with.

OUR SUPPLY CHAINS

Our key supply chains comprise of:

Data Suppliers – including Data Products and Services from third parties, delivered via API or flat file.

Technology Service Providers – including Managed Hosting Services, Cloud Solutions, Software Licenses and Hardware Supply.

People Services - including Recruitment Agencies, People Management Systems, Professional Service Advisors and Benefits Providers.

Facilities Management – including Building Maintenance, Refreshment providers and Office Consumable Suppliers.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

As part of our commitment to combating modern slavery, GBG has in place a number of internal policies on matters such as Anti-Bribery & Corruption and Whistleblowing which are readily available to all staff via GBG's internal intranet.

As part of GBG's whistleblowing processes, we encourage team members to raise any concerns and provide clear reporting lines. We have an external whistleblowing hotline which allows team members to report in confidence wherever in the world they are located and monthly reports are provided to Company Secretary, who directly reports to the Chair of the Audit Committee on such matters. No concerns have been raised.

To ensure that team members are aware of the ethical behaviors expected of them, GBG has implemented a Code of Conduct that combines a number of our Group policies. We encourage all members of GBG to live up to the spirit of the Code of Conduct and make decisions only in accordance with our values.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our due diligence processes into slavery and human trafficking our supplier approval process incorporates a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. The company will not support or deal with any business knowingly involved in slavery or human trafficking and the company will continue to protect whistleblowers.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we regularly circulate and share our Modern Slavery statement with staff which includes our commitment to the legislation. In addition all new starters will be required to review and confirm their understanding of our Modern Slavery statement as part of their online induction process.

SUPPLY CHAINS

To ensure that there is no slavery or human trafficking in our supply chains we have taken the following steps:

- Ensure suppliers support GBG's principals as set out in its Modern Slavery statement and that they comply with applicable legislation and regulatory requirements;
- As part of the onboarding process of new suppliers, our standard Terms and Condition for Suppliers include a Modern Slavery clause; and
- Instances of non-compliance are assessed on a case-by-case basis and any remedial actions are tailored appropriately.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2019. The statement has been approved by the Board of GB Group Plc on 24th September 2019 and signed by Chris Clark, CEO of GBG Group Plc.



GB Group plc
Date: 24th September 2019