



GÉANT Association Anti-slavery and human trafficking policy

1. Introduction

- 1.1 Conducting our business in an ethical and honest way is fundamental to how GÉANT operates. In line with this commitment, GÉANT strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain.
- 1.2 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.
- 1.3 At GÉANT, we are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

2. Policy Statement

- 2.1 We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:
 - 2.1.1 We have a zero-tolerance approach to modern slavery in our organisation or our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
 - 2.1.2 We are committed to having a clear and transparent organisational statement, which is reviewed regularly and is communicated to our employees, which sets out the steps taken to prevent modern slavery and trafficking and the effectiveness of those measures.
 - 2.1.3 We are committed to training relevant employees in modern slavery, how to identify it in practice and how to respond.
 - 2.1.4 We are committed to engaging within the network community, our National Research and Education Networks (NRENs), other stakeholders and our suppliers to address the risk of modern slavery in our operations and supply chain.
 - 2.1.5 As part of our contracting processes, our intention is that our suppliers will prohibit the use of modern slavery and trafficked labour and will comply in all material respects with our Code of Conduct setting out the minimum standards required to combat modern slavery and trafficking.
 - 2.1.6 Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with our Code of Conduct. Suppliers engaging workers through a third party are also required to obtain third parties' agreement to adhere to the Code.
 - 2.1.7 We audit suppliers, based on risk, for their compliance with our Code of Conduct. We aim to work with suppliers to remediate incidents of non-



compliance and may terminate the relationship in response to gross, persistent or deliberate failures.

3. **Policy Application**

- 3.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.
- 3.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 3.3 Workers must ensure that they read, understand and comply with this policy.

4. **Responsibility for the policy**

- 4.1 The Board of Directors has approved this policy, is committed to making available sufficient resources for its implementation and has overall responsibility for ensuring compliance.
- 4.2 The Chief Financial Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 4.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Chief Financial Officer.

5. **Reporting Modern Slavery**

- 5.1 If any employee, or anyone working for GÉANT under any other type of contract has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must bring this to our attention in one of the ways set out below. All concerns must be raised in good faith, and every concern will be treated seriously and will be fully investigated. Employees should report to their line manager or the Head of HR.
- 5.2 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Financial Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the relevant procedure in your country of employment (for example the Whistleblowing Policy).

6. **Breaches of this policy**

- 6.1 Any employee who breaches this policy will face disciplinary action, which could even result in the termination of employment.



6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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1. CONTACTS

CEO, GÉANT	Erik Huizer Tel: + 31 65 376 5110 Email: erik.huizer@geant.org
Chairman of the Board of GÉANT	Christian Grimm Tel: + 49 30 884299-0 Email: grimm@dfn.de
External 24 Hour Whistleblowing Hotline	Safecall Tel: 0800 915 1571 (UK) Tel: 00800 7233 2255 (NL) E-mail: geant@safecall.co.uk Website: www.safecall.co.uk/reports
Public Concern at Work (Independent whistleblowing charity)	Helpline: +44 (0) 20 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk
Huis voor Klokkeluiders (Independent whistleblowing organisation)	Helpline: +31 (0) 88 371 3031 Email: advies@huisvoorklokkeluiders.nl Website: www.huisvoorklokkeluiders.nl/