

**GATEWAY GLOBAL COMMUNICATIONS LIMITED**  
(the "Company")  
Company No. 04229171

2018 Annual Statement in Compliance with S54 of the UK Modern Slavery Act 2015

**Implementation Update**

Following on from our previous Annual Statement, the Company has taken the following measures during 2018:

**Dividing our Vendors by Industry**

Having investigated the circumstances in which modern slavery appears in the supply chains of UK companies, we took the position that vendors employing highly skilled personnel (such as engineers or other professionals) were low risk for instances of modern slavery, and that higher risk industry sectors for our business were:

- Providers of catering and cleaning services; and
- Product manufacturers.

Having divided our vendors into vendors in high risk, medium and low risk industries in accordance with the above, we identified 40 vendors used by the Company during 2017-2018, as being higher risk for modern slavery and human trafficking, and being organisations which should be required to confirm compliance with our policy.

We also identified a requirement to update our site access policies, so that supplier personnel providing cleaning or catering services at Company facilities are required to carry their passports or other proof of their right to work in the UK (where such right would not be automatic).


**New Vendors**

The Company's Vendor Management Group sends new vendors our supplier policy for confirming that it has taken all reasonable steps to eliminate modern slavery and human trafficking in its supply chain.

**Ongoing Staff Training**

We have further identified that at each annual appraisal, all employees of the Company should be shown a copy of certain Company policies, including the Modern Slavery Policy, and that employees should be required to sign to confirm that they have read each of them.

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Document Approval and Authorisation	
<b>Approved by: Board Action</b>	<b>Date: 18/March/2019</b>
 C Marc Halbfinger Director	<b>Date: 18/March/2019</b>