



MODERN SLAVERY STATEMENT

GREATER MANCHESTER TRAVELCARDS LIMITED

1. INTRODUCTION

GREATER MANCHESTER TRAVELCARDS LIMITED (GMTL) is committed to ensuring that its business and supply chains are free from slavery and human trafficking. We have a responsibility to take a robust approach to slavery and human trafficking and are committed to acting ethically and with integrity in all our business dealings and relationships. Furthermore, we will enforce effective systems and controls to combat modern slavery and human trafficking.

Section 54 of the Modern Slavery Act 2015 ("MSA") places a legal requirement on large businesses such as GMTL to publish an annual statement of the steps that the organisation has taken during the previous financial year to ensure that modern slavery (including human trafficking) is not taking place in its business or supply chain. This statement is made pursuant to the MSA for the financial year ending 31 December 2020.

2. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

2.1 Our organisation

GMTL is a Company that administers and manages the provision of multi-operator travel tickets for use within the Greater Manchester Metropolitan County in the United Kingdom.

We are an individual Company providing a service wholly within Greater Manchester and have no employees. The administrative and management functions are executed by two consultants.

We have an annual United Kingdom pre COVID-19 turnover of £46m.

2.2 Our supply chains

We procure services from eight suppliers based in the United Kingdom having direct contractual relationships with all on the principle of first tier suppliers. Only four of these first-tier suppliers meet the threshold that requires the publication of a Modern Slavery Policy. There are a few lower tier suppliers, with whom our first-tier suppliers' contract.

We have one agent in the Greater Manchester area providing ticket purchasing facilities at retail outlets that are located throughout the region.

3. **OUR POLICIES**

As part of GMTL's commitment to ensuring that our business and supply chain are slavery-free, we have implemented a Modern Slavery Policy. The two Consultants employed by GMTL are obliged to sign and comply with the Policy. GMTL is in the process of seeking to ensure that the first-tier suppliers accept contractual obligations to comply with our Modern Slavery Policy and to oblige suppliers who supply them with services to do so.

The Consultant who is assigned the role of General Manager maintains overall responsibility for the organisation's Modern Slavery Policy.

4. **TRAINING**

The two principal Consultants working for GMTL are required to ensure their awareness of the Modern Slavery Policy with an annual review being undertaken supported by an appropriate training session. As part of the implementation of the Policy, we will require our first-tier suppliers to appraise their workers and suppliers of the Policy.

5. **RISK MONITORING AND COMPLIANCE**

As part of our initiative to identify and address risks of slavery in our supply chain we: -

- request our first-tier suppliers to provide a copy of their Modern Slavery Statement. We view none of these suppliers as falling into high-risk categories but monitor them for any changes in their Company profiles which could change this view. If changes that create concern are identified, we will follow appropriate guidance in discharging those concerns.
- encourage openness and support anyone who raises genuine concern in good faith under our Modern Slavery Policy. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

6. **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We recognise our responsibility to identify and address potential or actual human rights impacts linked to the services we purchase. Our initial appraisal of our current network of suppliers does not indicate that there is a higher risk, but we recognise this is an ongoing review process.

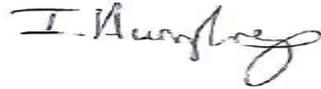
7. **NEXT STEPS**

Following a review of the effectiveness of the steps we have taken to date to ensure that there is no slavery or human trafficking in our business or supply chains, we intend to remain

focussed on maintaining the highest standards of ethical and business integrity across GMTL and its service providers. In the forthcoming financial year GMTL will remain committed to ensuring that its Policy is fit for purpose to address any perceived risk of modern slavery occurring in GMTL or its suppliers.

8. APPROVAL OF THIS STATEMENT

This statement was approved by the Board of Directors on 24 May 2021.



SIGNATURE OF DIRECTOR

Name: Ian Humphreys

Date: 25 May 2021