

Modern Slavery Policy

TRADEHANDS

tradehands.co.uk

GIE Capital Ltd trading as TradeHands

Last updated: April 2026

1. Our commitment

GIE Capital Ltd (trading as TradeHands) is a construction labour supply business registered in England and Wales (Company No. 16746326). We supply skilled construction workers — including labourers, gatemen, traffic marshals, and general operatives — to contractors and site managers across London, the South East, and the South West of England.

We are committed to acting ethically and with integrity in all our business dealings. We take a zero-tolerance approach to modern slavery and human trafficking in any form — whether within our own operations or in our supply chain.

This policy applies to all persons working for us or on our behalf in any capacity, including employees, contractors, subcontractors, and workers supplied through third-party partners.

2. Our supply chain

Our supply chain consists primarily of:

- Workers: individual construction operatives who register with TradeHands to seek work
- Payroll/umbrella partners: third-party payroll companies used to process worker pay in compliance with UK PAYE and CIS requirements
- Clients: construction contractors and site managers to whom we supply workers

We take reasonable steps to verify that all workers we supply have the legal right to work in the United Kingdom. Before any worker's first assignment, we check and retain copies of valid right-to-work documentation in accordance with the Immigration, Asylum and Nationality Act 2006 and current Home Office guidance.

We require that any payroll or umbrella partner we work with is HMRC-compliant, transparent in their worker pay processes, and able to demonstrate compliance with the Modern Slavery Act 2015.

3. Due diligence

As part of our commitment to identifying and addressing modern slavery risks, we:

- Carry out right-to-work checks on every worker before their first assignment
- Verify CSCS card status independently via [cscs.uk.com](https://www.cscs.uk.com)
- Work only with payroll and umbrella partners who process worker pay in full compliance with PAYE and CIS requirements
- Remain alert to indicators of forced labour, debt bondage, or trafficking — including workers who appear controlled by a third party, are reluctant to speak freely, or whose pay arrangements appear irregular
- Take immediate action — including suspension from work and referral to the relevant authorities — where we have reason to believe a worker may be a victim of modern slavery

4. Reporting concerns

We encourage anyone — worker, client, or third party — to report concerns about modern slavery or human trafficking.

To report a concern, contact us:

- Email: hello@tradehands.co.uk
- Post: GIE Capital Ltd t/a TradeHands, Unit A, 82 James Carter Road, Bury St. Edmunds, Suffolk, IP28 7DE

You can also report directly to the Modern Slavery Helpline: 0800 0121 700 (free, 24/7), or online at modernslaveryhelpline.org.

5. Responsibility

Ultimate responsibility for compliance with this policy rests with the Directors of GIE Capital Ltd. All staff and consultants working for or with TradeHands are expected to read and comply with this policy.

6. Review

This policy is reviewed annually. Any significant changes to our operations or supply chain that affect modern slavery risk will prompt an earlier review.

7. Contact

For questions about this policy: hello@tradehands.co.uk