



# 2020 UK Modern Slavery Act Statement

*This Statement is made voluntarily by General Electric Company (the "Company") and pursuant to Section 54(1) of the Modern Slavery Act 2015 (the "Act") on behalf of its affiliates conducting business in the UK and covered by the Act, as listed in Appendix A ("GE Reporting Entities"). The Statement discusses actions GE took in its prior fiscal year to address risks of modern slavery in its own operations and value chain, and which the Reporting Entities participated in as part of the GE human rights program. The business disruption caused by the COVID pandemic, and corresponding re-focus of resources to respond thereto, resulted in the need for additional time to verify certain supply chain audit data contained in this year's statement.*

## Introduction

GE delivers innovative solutions and services to provide essential infrastructure for the world. We work with the highest integrity, a compliance culture, and respect for human rights, while also striving to reduce the environmental footprint of our operations and technology. This is our fourth Modern Slavery Act Statement. It builds on our prior statements to demonstrate our continued commitment to address modern slavery and other human rights risks throughout our global operations and value chain. We are proud of our efforts on this issue but are mindful that our program must continually improve as we remain vigilant in our fight against this global human rights crisis.

As we detail below, GE and its businesses continued their extensive efforts to prevent forced labor in the Company's vast supply chain through on-site audits, employee training, and supplier pre-qualification and education. We view multi-stakeholder collaboration as critical to winning this battle, and in 2019 we continued to engage in joint efforts to drive change in challenging regions and sectors, particularly in the area of ethical recruiting.



GE AVIATION



GE HEALTHCARE



GE POWER



GE RENEWABLE ENERGY

## Business & Supply Chain

GE is a diversified global group with approximately 190,000 employees, over half of whom work outside the US. GE focuses on four key industries: aviation, healthcare, power, and renewable energy; the Reporting Entities are each a part of or support one of these business divisions. A more detailed description of GE's business operations and ambitions can be found in our annual report.

GE's supply chain is expansive and global, spanning 125 countries. We source more than \$53B annually in raw materials and components that are incorporated into the products and services that GE sells. The largest categories of direct material purchases are castings, forgings, electronics, plastics and machined parts. GE also buys products and services to support our business operations, which are used to develop or create, but are not incorporated into, GE's products or services. These indirect purchases amount to more than \$10B annually.

Updated September 2020



**Since 2005**, GE has conducted more than 33,000 supplier assessments spanning 100 countries.

*GE is committed to taking steps to prevent acts of modern slavery and human trafficking in its business operations and supply chains.*

[www.ge.com/sustainability/human-rights-supply-chain](http://www.ge.com/sustainability/human-rights-supply-chain)

[sustainability@ge.com](mailto:sustainability@ge.com)

## Policies & Programs

GE has embedded respect for human rights throughout our global organization. Our Global Counsel for Labor & Human Rights is responsible for setting human rights strategy for GE businesses, including our modern slavery program. He works closely with a cross-functional Environmental, Social and Governance (ESG) Steering Committee, comprised of senior personnel from across the company, to establish ESG priorities and coordinate GE's array of global initiatives. The Company's Board of Directors and its committees oversee the execution of GE's Environmental, Social and Governance (ESG) strategies and initiatives as an integrated part of their oversight of GE's overall strategy and risk management. In addition, the Governance Committee assists the Board in its oversight of corporate social responsibilities, significant public policy issues, protection of human rights, environmental, health and safety matters, political contributions and philanthropic efforts. The Reporting Entities, through their business divisions, are responsible for operationalizing the Company's governance strategy.

The Company's Integrity Guide for Suppliers, Contractors and Consultants (which is applied by all GE companies, including the Reporting Entities, when applicable) extends the reach of our code of conduct and its requirement of "unyielding integrity and high standards of business conduct" to our suppliers and their subcontractors, including labor providers. Beyond compliance with all applicable local laws and regulations, the Integrity Guide mandates third-party adherence to GE standards in areas including fair employment practices, environment, health and safety, and human rights. In the area of forced labor, the Integrity Guide expressly prohibits any form of compulsion, coercion or human trafficking; lists prohibited activities associated with trafficking, such as withholding passports, charging recruitment fees, and misleading recruitment; and imposes affirmative obligations on suppliers in certain circumstances such as reimbursement of return transportation costs and providing workers with written contracts in a language they understand. The Guide also encourages reports of violations of the policy through telephone, email and in-person channels by employees and third parties.



The Company's Human Rights Statement of Principles (applicable across GE, including the Reporting Entities) remains the cornerstone of our global program, emphasizing the importance of "respect for fundamental human rights." The Statement is embedded in expectations of all businesses and personnel through our code of conduct, The Spirit and The Letter ("S&L"), which applies to all GE directors, officers and employees, including subsidiaries and affiliates. The S&L and its accompanying policies, including a new policy dedicated exclusively to human rights, address the full spectrum of integrity and compliance issues across GE's global value chain. GE expressly prohibits the types of actions associated with the most common forms of modern slavery, including the charging of recruitment fees, the withholding of immigration documents, and the use of misleading recruitment tactics. Violations of this policy can result in disciplinary action, up to and including termination.

## Due Diligence

GE strives to ensure compliance with these policies through a rigorous due diligence program reaching throughout our value chain. The GE Ombuds program, comprised of hundreds of trained employees at the Corporate and business level, is a chief vehicle for us to hear from employees regarding any contraventions of our integrity standards. The program enables any employee to raise concerns, including those relating to respect for human rights, confidentially and without fear of retaliation. Consistent with our Human Rights Statement and in the spirit of "Eyes Always Open," employees are expected to report unfair employment practices and human rights concerns they observe when at GE sites or working with direct business partners.

One significant way GE advances respect for human rights, in particular in the area of forced labor, is through its well-established, multifaceted ethical supply chain program. Under this program, GE businesses (of which the Reporting Entities

**TOTAL SRG ON-SITE AUDITS IN 2019: 2,384**

- Onboarding/New Suppliers: **869**
- Recertifications/Existing Suppliers: **1,341**
- Suppliers from Acquisition: **174**

**RESULTS IN 2019**

- Total Audit Action Items/Recommendations: **15,126**
- Total Audit Action Items Closed : **94.5%**

are a part) conduct in-depth, on-site assessments of most suppliers in high-risk countries<sup>1</sup> both before they are approved for onboarding, and periodically thereafter<sup>2</sup>, to ensure supplier compliance with GE's principles on fundamental human rights, along with health & security. Among other things, these audits inquire specifically into how workers are recruited into their jobs and treated by their employers to detect any conditions of modern-day slavery.

When issues are found in supplier audits, our initial goal is to work with the suppliers to bring their practices into compliance. However, GE businesses reserve the right to suspend all purchase orders under the contract if findings aren't closed promptly and permanently. While our goal is to work with suppliers, serious labor-related findings can result in immediate cessation of business relationships.

In 2019, GE businesses, including those within which the Reported Entities sit, assessed approximately 2,384 new or existing suppliers, generating more than 15,000 findings. About 56% of our total assessments in 2019 were reassessments. Since 2005, GE businesses have conducted more than 33,000 supplier assessments spanning 100 countries. GE publishes an annual overview of its businesses' supply chain audit results on its website.

GE is attuned to the risk of forced labor in other operations and business relationships. As a result, it has implemented a pre-qualification program for its businesses to use in evaluating potential labor service providers. The program requires the vendors to provide upfront information on worker safety and human rights policies and programs as part of a mandatory pre-qualification assessment. The human rights portion of this new process focuses significantly on forced labor indicators, such as wage practices, recruitment efforts, and passport handling. This new process provides businesses with a way to both assess potential contractors on their human rights programs and educate them as to the nature of forced labor

and what is needed to prevent it. Businesses have also been posting at many sites around the globe a human trafficking education and hotline notice to alert employees and contract workers of GE's prohibition on forced labor and how to report any suspicion of such actions. The notice makes clear that complaints of such behavior can be reported to ombuds not only by employees but also by contract workers.



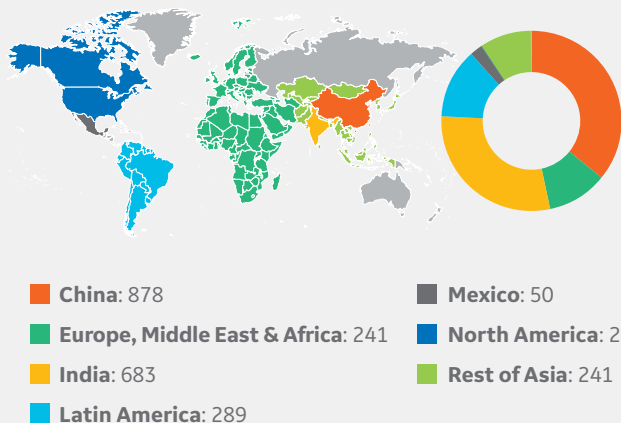
## Training & Awareness Raising

GE's human rights program depends on the practical understanding of our people and business partners. We provide our businesses with learning modules on human rights and forced labor which give employees an easy, efficient way to understand the core principles of human rights; the Company wide policies and programs; the causes and global footprint of forced labor; and, most importantly, how they can serve a role in identifying and reporting possible signs of modern slavery when they are at GE operations, supplier facilities, or customer sites.

We ensure that this awareness raising is ongoing. GE maintains an internal human rights "Yammer" page through which business employees can receive updates and participate in conversations concerning human rights and forced labor. We have also distributed an internal training video discussing a real wage-withholding scenario one of our businesses confronted with its vendors and using that example to once again educate the workforce on issues that can lead to forced labor.

GE businesses provide their direct material suppliers an online compliance video that includes a module explaining GE's position on human rights, with a more in-depth focus on forced labor—what it is, how extensive the problem is globally, and what suppliers must do or avoid doing to comply with GE's forced labor policy. Suppliers view this video as part of their commitment to abide by our Integrity Guide. The Company also has provided training on its forced labor prevention expectations to some potential Engineering, Procurement and Construction (EPC) partners on large GE Power and Renewables construction projects where low-skilled, migrant labor will likely be working.

SUPPLIER AUDITS BY REGION (2019)



<sup>1</sup> Among other factors, GE uses globally recognized modern slavery indices to identify high risk countries subject to this enhanced due diligence.

<sup>2</sup> Most GE suppliers in high risk countries are subject to an on-site reassessment on a one- to five-year schedule depending on their performance in prior assessments among other factors.

## GE'S PARTNERSHIP WITH THE GLOBAL BUSINESS INITIATIVE

As a founding member of Global Business Initiative on Human Rights (GBI), GE is committed, along with other member multinational corporations, to embed respect for human rights into our business operations. Peer learning and benchmarking enables GE to determine the right strategy and process to address human rights risk in our business area. By connecting with industry leaders and engaging with this business led group, GE gains insights into emerging trends and issues and examines challenges and potential solutions that other members have experienced.



migrant workers are recruited, with a focus on eliminating fees being charged to workers to secure employment. The aims of this initiative are to:

1. Create demand for responsible recruitment by raising awareness about the benefits of ethical practices and developing tools to help companies implement the Employer Pays Principle.
2. Increase the supply of ethically sourced labor by creating an enabling environment and supporting the development and implementation of systems to identify and use ethical recruitment agencies.
3. Advocate for improved protection for migrant workers by brokering dialogue to promote the effective regulation and enforcement of the recruitment industry.

## Engagement

Beyond our own workers and suppliers, GE and its businesses engage with external stakeholders to identify human rights risks throughout our value chain and to collaborate with peers, experts, and civil society groups to seek practical solutions. The GE Foundation, for instance, has funded the Institute for Human Rights and Business (IHRB) Responsible Recruitment Initiative, focused on addressing modern slavery. GE is also a founding member of the Global Business Initiative on Human Rights, a cross-industry peer learning platform; and a Participant in the UN Global Compact (including the Human Rights and Business Dilemmas Forum).

GE is actively engaged in the Leadership Group for Responsible Recruitment, a collaboration between leading companies and expert organizations to drive positive change in the way that

## Conclusion

The UK Modern Slavery Act continues to serve a significant role in driving transparency in global efforts to address the problem of modern slavery. As discussed above, GE and its businesses, including the Reporting Entities, continue to build on the Company's longstanding human rights program to better identify and prevent forced labor in their own operations and those of their suppliers and business partners. This global scourge can only be overcome by a joint effort of states, private enterprises, and civil society. We have been and remain committed to upholding our fundamental role in this critical effort.

This statement was approved voluntarily by the Board of General Electric Company and pursuant to Section 54(1) of the UK Modern Slavery Act by the Boards of the Reporting Entities as listed in Appendix A.

**H. Lawrence Culp, Jr.**

Chairman of the Board and Chief Executive Officer  
General Electric Company



## Appendix A

### Company Name

GE Aircraft Engine Services Limited  
GE Caledonian Limited  
GE Aviation Systems Limited  
General Electric Energy UK Limited  
GE Medical Systems Limited  
GE Healthcare Limited  
GE Energy Power Conversion UK Limited  
GE Healthcare UK Limited  
GE Capital Europe Limited  
GE Grid Solutions (UK) Limited  
FieldCore Service Solutions International LLC  
GE Capital Equipment Finance Ltd  
GE Capital EMEA Services Limited  
IGE Energy Services (UK) Limited  
General Electric Global Services GmbH  
General Electric International, Inc.  
GE Infrastructure Aviation  
GE Industrial Consolidation Limited  
IGE USA Holdings  
GE UK Holdings  
GE Aviation Systems Group Limited  
One GE Healthcare UK  
GE Healthcare (NMP) Limited  
GE Power Conversion Brazil Holdings Limited  
IGE USA Investments Limited  
GE Aviation UK  
GE UK Group  
GE Capital International Holdings Limited  
International General Electric (U.S.A.)  
GE Energy Power Conversion UK Holdings Limited  
General Electric UK Holdings Ltd.