



# 2021 UK Modern Slavery Act Statement

## Introduction

This Statement is made voluntarily pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) by General Electric Company on behalf of its affiliates conducting business in the UK and covered by the Act (as listed in Appendix A herein referred to as “GE Reporting Entities”), (together the “Company” or “GE”). 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 GE’s human rights program.

GE delivers innovative solutions and services to provide essential infrastructure for the world. We work with the highest integrity, a compliance-oriented culture, and respect for human rights, while also setting ambitious goals to reduce emissions through operational efficiencies and technology. This statement builds on statements we’ve submitted under the *California Transparency in Supply Chains Act of 2010* and the *Australian Commonwealth Modern Slavery Act 2018* to demonstrate GE’s 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 continued our extensive efforts to prevent forced labor in the Company’s 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 2020 we continued to engage in joint efforts to drive change in challenging regions and sectors, particularly in the area of ethical recruiting.



GE POWER



GE RENEWABLE  
ENERGY



GE AVIATION



GE HEALTHCARE

## Our Structure, Operations & Supply Chain

### Structure and Operations

GE is a high-tech industrial company that operates worldwide through its four industrial segments, Power, Renewable Energy, Aviation and Healthcare, and its financial services segment, Capital.

At year-end 2020, GE and consolidated affiliates employed approximately 174,000 people, of whom approximately 8,843 were employed in the UK. A more detailed description of GE’s business operations and ambitions can be found in our [2020 Annual Report](#).

We serve customers in over 170 countries. Manufacturing and service operations are carried out at 82 manufacturing plants located in 28 States in the United States and Puerto Rico and at 149 manufacturing plants located in 34 other countries. Approximately 12 are located in the UK.

GE owns and controls the GE Reporting Entities listed in Appendix A. GE Company is incorporated in New York, with its principal executive office in Boston, Massachusetts, USA.


Updated June 2021



**Since 2005**, GE businesses have conducted more than 34,000 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)

## Supply Chain

GE's supply chain is expansive and global, spanning 125 countries. We source a wide variety of 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.

## Our Commitments & Programs

Our commitment to human rights is grounded in the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the Ten Principles of the United Nations Global Compact. Driven by those standards, we strive to respect the fundamental dignity of everyone we might affect directly through our operations, products, and services and indirectly through our business relationships across the globe. Our ideals flow from the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the Sustainable Development Goals.

Using those as our foundation, we address modern slavery risks through specific policies, training and awareness, due diligence and remediation.

### Policies & Standards

The Company's **Human Rights Statement of Principles** (applicable across GE, including the Reporting Entities) is the cornerstone of our global program, emphasizing the importance of "respect for fundamental human rights." The Statement specifically prohibits reliance on any form of forced, prison or indentured labor and is embedded in expectations of all businesses and personnel through our Code of Conduct, The Spirit & The Letter.

**The Spirit & The Letter** ("S&L") sets the Company's expectations regarding ethics & compliance and applies to all GE directors, officers and employees, including those working for our subsidiaries and affiliates. All new hires are required to review and agree to abide by the S&L during the onboarding process, and employees are further expected to annually acknowledge their commitment to comply. 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.

The **Human Rights Enterprise Standard** (applicable across GE, including the Reporting Entities), released in 2020 and intended specifically for GE business compliance professionals, supplements the S&L Human Rights Policy by setting forth the core human rights expectations of the businesses. More specifically, the document outlines auditable controls and requires that the businesses have appropriate mechanisms in place to monitor those controls. The Enterprise Standard further sets out minimum requirements



regarding risk assessment and mitigation, due diligence of third parties, and escalation and remediation of any concerns related to human rights. Other related policies and procedures, such as the S&L Environmental, Health, and Safety Policy and the S&L Respectful Workplace Policy, are also embedded through GE's business enterprise through similar enterprise standard and policy documents.

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.

## TOTAL SRG ON-SITE AUDITS IN 2020: 1,286

- Onboarding/New Suppliers: **608**
- Recertifications/Existing Suppliers: **616**
- Suppliers from Acquisition: **62**

## Governance

GE has embedded respect for human rights throughout our global organization. Our Global Human Rights Counsel is responsible for setting human rights strategy for GE businesses, including our modern slavery program. She 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 global initiatives. The Company’s Board of Directors and its committees oversee the execution of GE’s ESG strategies and initiatives – including regarding human rights – as an integrated part of their oversight of GE’s overall strategy and risk management. The Reporting Entities, through their business divisions, are responsible for operationalizing the Company’s governance strategy.

## Training & Awareness

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 communications 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 GE’s Integrity Guide. The Company also provides training on

its forced labor prevention expectations to potential Engineering, Procurement and Construction (“EPC”) partners on large GE Power and Renewables construction projects, where low-skilled, migrant labor will likely be working.



In 2020, we enhanced training modules for our employees and business partners by creating “fast training” learning modules on human rights and forced labor for a brief, practical way to understand indicators of key risks; the Company’s 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.

## Processes & Risks:

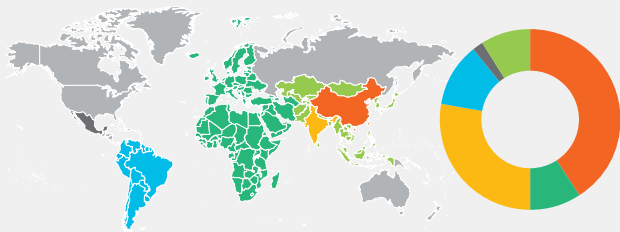
### Due Diligence & On Site Supplier Assessments

GE strives to ensure compliance with these policies through a rigorous due diligence program reaching throughout our value chain.

One significant way GE advances respect for human rights, in particular in the area of forced labor, is through our well-established, multifaceted ethical supply chain program. Under this program, GE businesses (of which the Reporting Entities are a part) conduct due diligence on their suppliers, known as the Know Your Supplier (“KYS”) process, where, based upon the location and type of service engagement, GE will research and review the third party for human rights risks. Additionally, suppliers in high-risk countries will undergo an in-depth, on-site assessment of their manufacturing site, both before they are approved for onboarding and periodically thereafter, to ensure supplier compliance with GE’s principles on fundamental human rights. Among other things, these assessments inquire specifically into how workers are recruited into their jobs and treated by their employers to detect any conditions of modern slavery.

In 2020, despite the restrictions and impacts caused by Covid-19, GE businesses, including those within which the Reporting Entities sit, assessed approximately 1,286 new or existing suppliers, generating more than 7,300 findings. About 48% of our total assessments in 2020 were reassessments. Since 2005, GE businesses have conducted more than 34,000 supplier assessments spanning 100 countries. GE publishes an annual overview of its businesses’ supply chain assessment results on its website. The human rights portion of the assessment focuses significantly on forced labor indicators, such as wage practices, recruitment efforts, and passport handling. The questionnaire and indicators provide GE with a way to assess potential suppliers on their human rights programs, educate them as to the nature of forced labor and explain what is needed to prevent it.

## SUPPLIER AUDITS BY REGION (2020)



■ China: 527      ■ Latin America: 147  
■ Europe, Middle East & Africa: 117      ■ Mexico: 22  
■ India: 360      ■ Rest of Asia: 113



We track and monitor results with a proprietary reporting tool, which is supplemented with information from regional databases. When issues are found in supplier assessments, our initial goal is to work with the suppliers to bring their practices into compliance. Suppliers are expected to address findings promptly and permanently within 60 days. GE can suspend—and has suspended—purchase orders with suppliers who do not meet our integrity expectations under the contract.

#### **Pre-Qualification**

GE is attuned to the risk of forced labor in other operations and business relationships. Accordingly, businesses supplement the KYS due diligence process with an additional contractor pre-qualification program used for specific labor service providers. The program requires labor contractors to provide upfront information on worker safety and human rights policies and programs as part of the assessment. The human rights portion of this process emphasizes forced labor indicators, such as wage practices, recruitment efforts, and passport handling. This process provides GE businesses with a way to both assess potential contractors on their human rights programs and educate contractors 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 anonymously reported to the internal ombudsperson network, not only by employees but also by contract workers, without fear of retaliation.

In 2020 we continued to conduct due diligence on high-risk supply chain partners, train our auditors and other employees in how vulnerable populations end up in forced labor, and engage in joint efforts to drive change in challenging regions and sectors, particularly recruiting.

#### **Modern Slavery Risks**

Based on our due diligence and risk assessments, we have identified the following general types of modern slavery risks that may be present in our operations and supply chains:

1. **Operations** – In our operations, modern slavery risks may exist within the population of contingent workers that support GE office sites. These workers provide janitorial, food/beverage, security and other facilities-type services. These contingent workers are primarily provided through an enterprise-wide vendor arrangement but may also be further sub-contracted. GE maintains a strong partnership with the vendors who provide us with our contingent workers and conducts periodic reviews to ensure they are complying with their obligations and respecting human rights.
2. **Supply Chain** – Due to the nature of GE's products and services, potential sources of modern slavery risks include manufacturing sites in high risk countries; mineral sourcing deep in our supply chain; and use of low-skilled and/or migrant workers from subcontractors. Our modern slavery risks are most acute in those parts of our supply chain where we have limited or no visibility, such as subcontractors using seasonal,

low-skilled, and/or migrant labor and pre-smelter mineral sourcing. GE is also committed to work to eliminate from our products all minerals that support armed groups in the Democratic Republic of the Congo or from conflict-affected and high-risk areas ("CAHRAs"), while at the same time minimizing unintended consequences for legitimate miners and their dependents. More information on our responsible mineral sourcing program can be found in our [Responsible Mineral Sourcing Statement of Principles](#).

## **Ensuring Continuous Improvement**

GE assesses the effectiveness of actions through the Human Rights Working Group, review & analysis of its supply chain audit results, and learnings from the Open Reporting & Ombudsperson program.

#### **Human Rights Working Group**

In 2020, the Global Human Rights Counsel launched a cross-functional Working Group of human rights champions across all GE business units. The Working Group meets regularly to review key findings, share important legal and regulatory alerts, learn best practices and discuss trends identified through our various due diligence and investigative processes. The Working Group is comprised of different functions – including Human Resources, Sourcing, Legal/Compliance – to address feedback and opportunities. As deemed necessary, the Working Group may partner with local business teams to engage suppliers on their compliance and human rights programs to understand how modern slavery risks are mitigated. The Working Group also focuses on the implementation of the Human Rights Enterprise Standard.

#### **Ongoing Assessment & Effectiveness Review**

As GE strives for continuous improvement in all aspects of its operations, an ongoing assessment of the human rights program was conducted in 2020. GE's internal audit team conducted an audit of the human rights program at various businesses and project worksite locations. As a result of the audit and review, GE issued the "Human Rights Guidelines for Project Worksites," a guidance for individuals working at ongoing project sites. The guidance provides workers with an overview of fundamental human rights, an appreciation of how violations of these rights come up in the workplace, and an understanding of how to detect, respond to and remediate identified issues.

#### **GE Open Reporting & Ombudsperson Program**

The GE Open Reporting & Ombudsperson Program, comprised of hundreds of trained employees at the Corporate and business level, is a chief vehicle for the Company to hear from employees regarding any violations of our integrity standards. The program enables employees to raise concerns, including those relating to respect for human rights, confidentially and without fear of retaliation. Consistent with our Human Rights Statement of Principles, and in the spirit of "Eyes Always Open," employees are expected to report unfair employment practices and human rights concerns they observe at GE sites or working with direct business partners.

## 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.



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 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.

## Conclusion

The UK Modern Slavery Act serves 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.

## Our Partnerships

1. 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 Responsible Recruitment Initiative**, focused on addressing modern slavery. GE is also a Participant in the **UN Global Compact** (including the Human Rights and Business Dilemmas Forum).
2. As a founding member of **Global Business Initiative on Human Rights**, 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 businesses. 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.

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

ACAM Overseas Holdings	GE Capital Limited	GE Intelligent Platforms UK Limited
Altair Filter Technology Group Limited	GE Capital Sigma Holding Ltd	GE Medical Systems Limited
Altair Filter Technology Ltd	GE CIF Property Nominee Company No 1 Limited	GE Medical Systems Oxford Limited
Altair Holdings UK Limited	GE CIF Property Nominee Company No 2 Limited	GE Money Consumer Lending Limited
Blade Dynamics Limited	GE Digital Software Solutions Limited	GE Money Home Finance Limited
Blade Dynamics Tidal Energy Limited	GE Digital UK Limited	GE Money Home Lending Limited
Datex-Ohmeda Limited	GE Energy (UK) Limited	GE Money Mortgages Limited
Drives & Controls Services Ltd.	GE Energy Power Conversion Technology Limited	GE Money Secured Loans Limited
EFS Los Guindos UK Limited	GE Energy Power Conversion UK Holdings Limited	GE Money Servicing Limited
EFS UK Holdings Limited	GE Energy Power Conversion UK Limited	GE Oil & Gas Marine & Industrial UK Ltd.
G.E. C.I.F. Trustees Ltd.	GE Energy Services (UK) Limited	GE Pension Trustees Limited
G.E. S.P.S. Pension Trustees Ltd.	GE Financial Investments	GE Power Conversion Brazil Holdings Limited
GE (Holdings)	GE Financial Markets Funding I	GE Power UK
GE Additive UK and Ireland Limited	GE Grid Solutions (UK) Limited	GE Protimeter Limited
GE Aircraft Engine Services Limited	GE Healthcare (AB)	GE Renewable UK (Holdings) Ltd
GE Asset Management Limited	GE HEALTHCARE (NMP) LIMITED	GE Smallworld
GE Aviation Systems Group Limited	GE Healthcare Clinical Systems (UK) Limited	GE Steam Power Ltd
GE Aviation Systems Limited	GE Healthcare Finnamore Limited	GE UK Group
GE Aviation UK	GE Healthcare IITS UK Limited	GE UK Holdings
GE Bio-Sciences Investments Limited	GE Healthcare Limited	GEAPS PENSION TRUST LIMITED
GE Boving Himachal Pradesh Limited	GE Healthcare Pension Trustee Limited	GECAS Asset Management Services UK
GE Caledonian Limited	GE Healthcare Structured Projects (UK) Limited	GECAS UK Limited
GE Capital Corporation (Holdings)	GE Healthcare UK Limited	GEFM Edinburgh I Limited
GE Capital EMEA Services Limited	GE Industrial Consolidation Limited	GEH Holdings
GE CAPITAL EQUIPMENT FINANCE LTD	GE Industrial Finance UK Limited	GEHC (ATL) Limited
GE Capital Europe Limited	GE Industrial Sterling Treasury Services	GENERAL ELECTRIC ENERGY UK LIMITED
GE Capital European Treasury Services Limited	GE Industrial Treasury Holdings	General Electric UK Holdings Ltd.
GE Capital Finance	GE Infrastructure Aviation	Grid Solutions HVDC India Limited
GE CAPITAL FUNDING SERVICES LIMITED	GE Infrastructure UK Limited	I.G.E. (USA) Pension Trustees Limited
GE Capital Group Services Limited	GE Inspection and Repair Services Limited	IGE Dollar Treasury Services
GE Capital International 1 Limited	GE Inspection Technologies Limited	IGE Energy Services (UK) Limited
GE Capital International 4 Limited	GE Intelligent Platforms (Bracknell) Limited	IGE Euro Treasury Services
GE Capital International Holdings Limited		IGE Sterling Treasury Services Limited
GE Capital International Investments Limited		IGE USA Group
GE Capital Investments		IGE USA Holdings

IGE USA Investments Limited  
igroup8 limited  
International General Electric (U.S.A.)  
Key Leasing Limited  
MAES Finance Limited  
Milestone Aviation UK Ltd  
Milestone Aviation UK No. 2 Limited

Monica Healthcare Limited  
Oliver Crispin Robotics Limited  
One GE Healthcare UK  
Pignone Engineering  
Rapidscan Pharma Solutions EU Limited  
Red Artificial Lift UK Limited  
Smallworldwide Limited

UK Grid Solutions Limited  
Vetco Group  
Vetco International Limited  
Water Lane Trustees Limited  
Whatman International Limited  
Whatman Limited