2019 GE UK Modern Slavery Act Statement

This Statement is made by General Electric Company (“GE” or 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.

Introduction

GE’s enduring success is built on innovation, quality, and integrity. Sustainability and compliance are integral to our business strategy. This is our third 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 understand the enormity of this scourge and remain vigilant in contributing to the global efforts to eradicate it. As we detail below, in 2018 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.

Since 2005, GE has conducted more than 31,000 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.

Business & Supply Chain

GE is a diversified global company with approximately 283,000 employees, over half of whom work outside the US. In the last few years, the Company has sharpened its focus to four key industries: aviation, healthcare, power, and renewable energy. 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 more than 190 countries. We source more than $63B 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 $18B annually.

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Policies & Programs

GE has embedded respect for human rights throughout our global organization. Our Global Counsel for Labor & Human Rights is responsible for GE's human rights strategy, including our modern slavery program. He works closely with a cross-functional Environmental, Social and Governance (ESG) Steering Committee, comprising senior personnel from across the company, to establish ESG priorities and coordinate GE’s array of global initiatives.

GE’s Human Rights Statement of Principles is the cornerstone of our global program, emphasizing the importance of “respect for fundamental human rights”. The Statement is embedded in GE’s expectations of all 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 address the full spectrum of integrity and compliance issues across GE’s global value chain.

GE commits in the S&L to “respect human rights everywhere we work and do business with others” and again explicitly prohibits forced and child labor. The Fair Employment Practices policy in the S&L details 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.

GE’s Integrity Guide for Suppliers, Contractors and Consultants extends the reach of our code of conduct with “unyielding integrity and high standards of business conduct” expected of 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.

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, 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. In 2018, Ombuds received over 4,400 policy concerns (more than 58% outside the US) leading to over 6,600 corrective actions. The S&L expressly provides that GE employees have an obligation to promptly raise concerns when they “see a situation in which our integrity principles or policies are not being followed.” 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.

We also have a multifaceted ethical supply chain program. Under this program, suppliers are prioritized for detailed pre-engagement, and periodic follow-up, onsite assessments according to country risks (including human trafficking risk), supplier past performance and other factors, such as media reports or supplier employee complaints. The program includes procedures for risk-based on-site audits, during which trained GE personnel visit a supplier’s facilities and review its compliance with GE’s policies on health, safety, labor, security, and human rights.

We track and monitor results with a proprietary reporting tool, which is supplemented with information from regional databases. GE personnel trained on our integrity expectations conduct periodic spot-checks and audits on these records. Suppliers must generally address audit findings within 60 days. If not, GE reserves the right to suspend all purchase orders under the contract. While our goal is to work with suppliers to bring them into compliance, serious labor-related findings can result in immediate cessation of business relationships. GE suppliers are subject to an on-site reassessment on a one- to five-year schedule depending on their performance in prior assessments. In 2018, GE assessed ~2,500 new or existing suppliers, generating more than 18,000 findings. About 55% of our total assessments in 2018 were reassessments. Since 2005, GE has conducted more than 31,000 supplier assessments spanning 100 countries. GE publishes an annual overview of its supply chain audit results on its website.

In 2018, we continued improving our forced labor program. In particular, we rolled out our new prequalification program for all GE labor service providers—requiring them 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. The new process will provide GE with a way to both assess potential suppliers on their human rights programs and educate them as to the nature of forced labor and what is needed to prevent it.

Training & Awareness Raising

GE’s human rights program depends on the practical understanding of our people and business partners. We provide access to “fast training” learning modules on human rights and forced labor for all GE global employees, providing employees an easy, brief way to understand the core principles of human rights; 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.

We ensure that this awareness raising is ongoing. GE maintains an internal human rights “Yammer” page through which 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 the Company confronted with its vendors and using that example to once again educate its workforce on issues that can lead to forced labor. This video, and an accompanying training package, was part of a “Human Rights Month” that was overseen by the Company’s Compliance training team and highlighted various ways that employees could learn more about human rights and the risk of forced labor.

In 2018, we also completed and began posting at our 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 any such actions.
The notice makes clear that complaints of such behavior can be reported to GE by contract workers as well as GE employees.

For our suppliers, GE has rolled out a new supplier compliance video that included 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.

Engagement

Beyond our own workers and suppliers, GE engages 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 also recently joined 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

GE applauds the impact that the UK Modern Slavery Act and similar legal and voluntary initiatives have had on raising global awareness of, and initiating dialogue around, the epidemic of modern slavery. The UN Guiding Principles on Business and Human Rights provide a constructive roadmap for the roles of states and business in working to protect and respect human rights, and modern slavery is among the most salient issues for the all companies and states to address. GE is proud of the steps we have taken to date in this area, but we know that we must remain vigilant to play our part in helping bring an end to this scourge.