



# Global Procurement Group Limited Anti-Slavery and Human Trafficking Statement 2022

## Introduction

At Global Procurement Group Ltd (“GPG”) we are passionate about doing business the right way, and thousands of businesses trust us to help manage their utilities (including gas, electricity, and water) and find solutions to reduce their carbon emissions. We are therefore fully committed to ensuring that our organisation and our supply chain are free from slavery and human trafficking.

This Statement is presented on behalf of Global Procurement Group Limited, and the entirety of its UK subsidiaries collectively, including:

1. NGP Utilities Limited, our energy procurement business, which assists its customers to find the right utilities contracts for their businesses;
2. Northern Gas and Power Limited, which also provides energy procurement advice to businesses in the UK;
3. ClearVUE.business Limited, our consultancy business, which assists businesses reduce their energy consumption and carbon emission; and
4. Energies France SAS, our energy procurement business, which assists its customers to find the right utilities contracts for their businesses.

referred to as GPG herein. It also applies to its global supply chain.

Additionally, the subsidiaries of GPG mandated to produce their individual statements under the Modern Slavery Act 2015, have embraced and endorsed this declaration.

This Statement relates to actions and activities during the financial year of January to December 2022.

As an ethical company, GPG respects every individual’s human rights and:

1. has zero tolerance to slavery and human trafficking in all its business dealings,
2. is committed to the prevention of slavery and human trafficking in all its forms and
3. will not tolerate or condone it within any parts of its business.

GPG expects the same standards from its supply chain and business partners.

## Organisation and Structure

GPG is the parent company of leading independent utility cost management consultancies which provide energy procurement and energy management products and services to thousands of businesses throughout the UK and Europe.



GPG assists its partners in achieving better value from their utilities contracts, reducing their energy consumption and lowering their carbon footprint. GPG currently directly employs over 500 colleagues and operates from its headquarters in Gateshead (UK) and has offices in France, Malta, Texas, and India. We have a skilled workforce throughout, many of whom have specialist talents and abilities, valued in our commercial and technical environment.

We are passionate about our customer service and operational excellence, with ongoing investment and continual strategic enhancements to our business model.

We are equally passionate about contributing to the communities in which we live and work, through donations to local organisations such as children's charities, foodbanks, hospitals, and homeless charities, and through involvement in charity projects and community initiatives.

## **Our Business**

Our business is organised into a number of business units, including:

1. Energy procurement services;
2. Supply of energy monitoring hardware and software, to assist in the reduction of carbon emissions;
3. Energy Technology Services;
4. Price Comparison Sectors.

## **Our Supply Chains**

At the end of 2022, we contracted directly with a variety of third-party suppliers.

Our supply chains include a number of large energy suppliers that support the generation, purchasing, distribution, and supply of electricity, gas, and water and the production and distribution of energy efficiency measures, as well as our energy monitoring and efficiency software and hardware.

We have a current Purchase Order process, which we are looking to review and introduce a more effective and improved process, that falls in line with the Company's Expenses, Purchase Order and Travel Policy. This purchasing policy is designed to ensure that all purchases, that exceed £200, made on behalf of the Company, are pre-authorised and budgeted for, and are in the Company's best interests. The process entails purchase orders being submitted to the Purchase Ledger team for review and approval. Should the request exceed £200 or not be within budget, the Director with overall responsibility for the department will need to approve it. Where appropriate, we require the employee who is seeking to incur the expense to seek 3 quotes from different suppliers. The quotes are then submitted on a Purchase Request Form for approval by the budget holder, before being submitted to the Purchase Ledger team.

Suppliers are also required to ensure that any sub-contractors are obliged to meet these obligations. While suppliers will be required to manage their own sub-contractors, where used, we will ask for evidence of how these third parties are being



managed, either as part of ongoing monitoring and reporting or on an ad-hoc basis if specific concerns are identified.

To further its objectives in this regard, GPG has been working to set up a list of vetted and preferred suppliers who can demonstrate their compliance with the Modern Slavery legislation.

### **Our Policies on Slavery and Human Trafficking**

GPG has appropriate policies in place that underpin its commitment to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies and require all our colleagues to familiarise themselves with every key policy, and we provide training as part of the induction process, and on an ongoing basis during employment.

The following policies set out our approach to the identification of slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Our Anti-Slavery and Human Trafficking Policy sets out our commitment to ensuring that there is transparency in our own business and in our approach to tackling slavery throughout our supply chains. This policy also reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.
- Our Whistleblowing Policy encourages all colleagues to report any concerns related to direct activities or supply chains. All concerns are reviewed by our People Team who decide how matters should be managed. We do not tolerate any form of retaliation against those who raise concerns in good faith.
- Code of Conduct outlines the actions and behaviours expected of colleagues when representing GPG.
- Corporate Social Responsibility (CSR) Policy summarises how we work responsibly with suppliers and local communities.

Our policies require colleagues and suppliers to recognise the principles contained in our policies and adhere to them in all their activities on behalf of GPG. GPG also encourages all its colleagues who may have concerns about its ethical working practices to report those concerns, using the following routes:

- Directly to their manager or the People Team, in line with our Whistleblowing Policy; or
- Using our independent external “SafeCall” service where anonymous reports can be made.

The above provides an independent, confidential speaking-out process for GPG colleagues to report any other wrongful, criminal, or illegal conduct.



Given the nature of our business, the geographical areas in which we operate, and the measures we have in place, we believe that the risk of modern slavery in our supply chain is very low. However, identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. Therefore, we are committed to continuing to monitor and, where necessary, improving our policies and procedures to ensure that modern slavery and human trafficking does not take place anywhere in our supply chain.

We ensure to do so by:

- Encouraging stakeholders to raise any concerns where they feel they have experienced or witnessed acts that conflict with our policies.
- Reviewing policies by ensuring they are up to date and in line with current legislation.
- Educating all colleagues to ensure that they can identify any scenarios of incorrect conduct and are aware of the standard of behaviour expected from them.
- Offering awareness and refresher training on all policies.
- Carrying out audits to ensure that the business is adopting modern slavery best practices.

## **Our Colleagues**

Due to the diverse nature of our activities, we use a range of directly employed professionals and third-party suppliers to deliver specialist expertise.

We believe in supporting colleagues and working together. We operate a rigorous Talent Acquisition Policy which adheres to all relevant employment legislation and follows industry best practice, including:

- Legislation, regulation, and guidance from external organisations, including:
  - Equality Act 2010
  - General Data Protection Regulations (GDPR)
  - Bribery Act 2010
  - Health and Safety at Work Act 1974
  - Rehabilitation of Offenders Act 1974
- Related internal policies and procedures:
  - Disciplinary Policy and Procedure
  - Anti-Harassment and Bullying Policy
  - Equity, Diversity, and Inclusion
  - Grievance Policy
  - Data Protection (GDPR) Policy and Privacy Notice
  - Social Media Policy
  - Health and Safety Policy

We ensure that all job applicants are treated equally and without discrimination.

We aim to prevent illegal working via our recruitment process, which includes:





- obtaining documentary proof of the applicant's eligibility to work in the country in which they will be employed;
- issuing contracts in the colleague's native language;
- Avoiding detrimental changes to contractual terms or work conditions; and
- Ensuring resignations are voluntary.

We also ensure that our colleagues are rewarded fairly. This includes:

- carrying out a full review of colleagues' salaries to investigate and reduce any ethnicity and gender pay gaps. We also monitor and publish our gender pay gap figure: <https://ngpltd.co.uk/wp-content/uploads/2023/05/NGP-Gender-Pay-Gap-Report-2022.pdf>

Our 'Code of Conduct' policy provides a clear set of rules for all colleagues and sets out the standards of behaviour expected of them.

### **Further Steps and Due Diligence Processes for Slavery and Human Trafficking**

We continuously review and refresh all of our organisational policies, which includes, where appropriate; clarifying how existing policies and procedures already work to prevent modern slavery, and identifying those policies and procedures that need adapting to support our zero-tolerance stance. This comprehensive approach empowers us to evaluate the efficacy of historical measures taken and envision ways to enhance them in the future. In line with our goal of full compliance and in proactive anticipation of evolving government requirements, we are actively identifying emerging concerns and considering the implementation of a robust, enduring strategy.

Our induction and training programmes for colleagues include raising awareness of modern slavery, in order that anti-slavery practices become embedded as standard practice throughout GPG.

We are introducing additional procedures into our supply chain so that, when entering into a contract with a new supplier or renewing contracts with existing suppliers, their assurance is sought with regard to their own anti-slavery and human trafficking measures. We may terminate contracts with suppliers that fail to meet our expectations.

We reserve the right to carry out further due diligence should any of our suppliers give cause for concern in this respect.

### **Performance Indicators / Measuring Effectiveness**

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking are not taking place in any parts of our business or supply chain including:

- requiring colleagues to have completed training on modern slavery;
- using labour monitoring and payroll systems;



- Reviewing policies in line with current legislations;
- Continued vigilance to combat slavery and human trafficking;
- Ensuring employees are paid equal to or above the national minimum wage applicable in the country they are established.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and will be regularly reviewed and updated as necessary. The Board of Directors endorse this statement and are fully committed to its implementation.

**This statement has been approved & authorised by:**

Name: Mark Leeming

Position: Managing Director

Signature: 