



**Global Procurement Group Limited**  
**Anti-Slavery and Human Trafficking Statement**  
**v2 January 2022**

**Version Control**

<b>Effective Date</b>	<b>Version</b>	<b>Changes</b>	<b>Author(s)</b>
January 2022	-	Introduction of version control page	Kelly Convery
January 2022	2	Updated Introduction. Updated Company Name. Added Clause 3. Added Clause 4. Added Clause 5. Updated Clause 6. Updated Clause 7. Added Clause 8. Added Clause 9. Updated wording from 'you' to the Employee'. Added full clauses and sub clauses for referencing purposes.	Kelly Convery and Nuala Schweppe.



## 1. Introduction

Global Procurement Group Limited and any of its subsidiaries from time to time (“the Company”) are passionate about doing business the right way, and thousands of businesses trust the Company to help manage their utilities. The Company is therefore fully committed to ensuring that its organisation and its supply chain is free from slavery and human trafficking.

For the purposes of this policy, “Employees” refers to all employees, officers, consultants, contractors, casual workers and agency workers of the Company and any subsidiary from time to time.

For those Employees who are based outside of the UK, should there be any conflict between this policy and a local law, or any location-specific Anti-Slavery and Human Trafficking Policy put in place by the Company (or any subsidiary) from time to time, the local law or location specific policy shall take precedence over this Policy.

## 2. Organisational Structure and Background

Global Procurement Group Limited is the parent company of leading independent utility cost management consultancies which provide energy procurement and energy management products and services to over 15,000 businesses throughout the UK, Europe, USA & Asia. The Company assists its partners in achieving better value from their energy contracts, reducing their energy consumption, and lowering their carbon footprint. The Company currently employ over 700 colleagues, and operate from headquarters in Gateshead and other offices in the UK, France, USA, Malta, and India.

The Company is passionate about its customer service and operational excellence, with on-going investment and continual strategic enhancements to our business model.

The Company is equally passionate about contributing to the communities in which it lives and works, through donations to local organisations such as children’s charities, hospitals, and homeless charities, and through involvement in school projects and community initiatives.

## 3. The Company

The Company is organised in a number of business units, including:

- (a) Energy Procurement Services; and
- (b) Supply of energy monitoring hardware and software.

## 4. Supply Chains

The Company’s supply chains includes the production, purchasing and distribution of our energy monitoring hardware.

The Company has a strict purchase order procedure and does not pay in cash for goods and services. The Company’s major suppliers are large UK or multinational firms who have in place their own ethical business standards.

## 5. The Company’s Policies on Slavery and Human Trafficking



The Company have appropriate policies in place that underpin its commitment to ensure that there is no modern slavery or human trafficking in its supply chains or in any part of the business. The Company continuously reviews and updates all its policies.

The Company's Anti-Slavery Policy reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

Given the nature of the Company's business, the geographical areas in which it operates, and the measures it has in place, the Company believes that the risk of modern slavery in its 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, the Company are committed to continuing to monitor and, where necessary, improving its policies and procedures to ensure that modern slavery and human trafficking does not take place anywhere in its supply chain.

## **6. The Company's Colleagues**

The Company believes in supporting colleagues and working together. The Company operates a rigorous Talent Acquisition Policy which adheres to all relevant employment legislation and follows industry best practice, and it ensures that all job applicants are treated equally and without discrimination. The Company aims to prevent illegal working via its talent acquisition process, which includes obtaining documentary proof of the individual's eligibility to work in the country in which they will be employed. The Company always pay colleagues at least the minimum wage applicable to the country in which they work. The Company's Code of Conduct Policy provides a clear set of rules for all colleagues and sets out the standards of behaviour expected of them.

## **7. Further Steps**

The Company continuously review and refresh all 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 the Company's zero tolerance stance.

The Company are introducing additional procedures into its 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.

The Company reserve the right to carry out further due diligence should any of its suppliers give cause for concern in this respect. The Company is also updating its induction and training programmes for colleagues to raise awareness of modern slavery, in order that anti-slavery practices become embedded as standard practice throughout the Company.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

## **8. Review of Policy**

The Company reserves the right to review and amend this policy from time to time.

## **9. Breach of this Policy**



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Any Employee who breaches this Policy may face disciplinary action in accordance with the Company's Disciplinary Policy and Procedure. The Company takes breaches of this Policy very serious and may deem a breach as gross misconduct.

**This policy and procedure has been approved and authorised by:**

**Name:** Scott High

**Position:** People Director

**Signature:** 