





# MODERN SLAVERY POLICY STATEMENT

## 1.0 OUR BUSINESS

GAP Group UK North East's (Incorporating PA Moody Recycling Limited, GAP Waste Management & Transport, GAP Materials Processing Limited, GAP Ice, SIRG GAP Polymers, GAP Organics, and NEST Road Developments Limited), hereinafter referred to as "GAPGPAUK", operates a Waste Electrical Electronic Equipment (WEEE) Transfer and Treatment Facility, Food Waste Anaerobic Digestion Facility, General Haulage Services, Storage and Distribution services, Waste Recycling and Treatment within the Public and Private sector all over the UK.

The products, solutions, plant, and equipment GAPGPAUK utilises in our works are purchased through global suppliers who are in the main ISO 9001 and CE mark accredited or equivalent. These suppliers have established relationships with GAPGPAUK.

This statement relates to actions and activities during the financial year 2019

## 2.0 CODE OF CONDUCT

GAPGPAUK expects all staff to act with professionalism and integrity, and to act ethically at all levels. In turn, we expect our Partners, Suppliers, and Subcontractors to behave in the same manner ensuring no slavery, servitude, forced and compulsory labour, or human trafficking takes place within their business or their own supply chain, including both adults and children being forced to work against their free will.

## 3.0 OUR COMMITMENT

This statement sets out GAPGPAUK's actions to understand all potential modern slavery risks related to our business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. GAPGPAUK recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

GAPGPAUK is committed to ensuring that there is no modern slavery or human trafficking or in any part of our business. Our Anti-Modern Slavery Policy 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 is not taking place anywhere in our supply chains.

All our Suppliers and Subcontractors are required to indicate their policy and approach to the Modern Slavery Act provisions, and to detail what they do to ensure they, and in turn, their supply chain, are able to do to demonstrate compliance with the 2015 Act.

Training awareness of the Modern Slavery Act provisions are provided to Senior Management of the business through Management Review and internal communication updates.



#### **4.0 RESPONSIBILITY**

Responsibility for GAPGPAK's anti-slavery initiatives are as follows:

##### **4.1 Policies**

To be put in place by the quality team with oversight from the Special Projects Director and reviewed by the Managing Director and at Management Review meetings.

##### **4.2 Investigations / Due Diligence**

The Special Projects Director is responsible for undertaking any investigations and due diligence in relation to known or suspected instances of slavery and human trafficking within the business.

##### **4.3 Whistle Blowing**

If any of our staff have concerns they are expected to report them to their Line Manager, and Senior Management are expected to act upon them as detailed in QMS-QP-011 Whistleblowing at Work Policy and Procedure.

#### **5.0 SUPPLIER ADHERENCE TO GAPGPAK VALUES**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and Contractors to comply with our values.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our group's Slavery and Human Trafficking Statement for the current financial year.

Peter Moody  
**Managing Director**

Date: 16/07/2023