



MODERN DAY SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

GBA Group of Companies are clear that we have a duty to take a robust and definitive approach when addressing this challenging issue. It is of paramount importance to us that we meet and apply best practice throughout our organisation in accordance with the Modern Slavery Act 2015.

We are absolutely committed to defining and implementing appropriate policies and procedures, to prevent all forms of slavery throughout our business, corporate activities and supply chains, including, but not confined to, forced and compulsory labour, child labour and human trafficking.

Organisational structure and supply chains

Organisational Structure and Supply Chains

GBA Group of Companies currently operates throughout the United Kingdom and overseas; locations include: Sheerness, Queenborough, Doncaster, Immingham, Grimsby, Newcastle upon Tyne, Doncaster, Southampton, Bristol, Swindon and Derby

This statement covers, but is not confined to, all the stated locations and any potential additional locations, alongside all the activities of the GBA group of Companies. Responsibility of the organisation's anti-slavery initiatives can be defined as the below:

- **Policies:** Ultimate responsibility for defining and implementing policies and procedures lies with the GBA Group of Companies Board of Directors. The Board will ensure that everything implemented acts in accordance with current legislation, across all sites and in relation to all colleagues.
- **Risk Assessments:** Senior Management is also responsible for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** The Human Resources Department holds responsibility for appointing an investigating manager in relation to known or suspected instances of slavery and human trafficking

This statement covers the activities of the GBA Group of Companies operating within the United Kingdom and overseas:

- GBA Group Ltd
- GBA (Holdings) Ltd
- GB Agencies Ltd
- GB Shipping & Forwarding Ltd
- GB Terminals Ltd
- GB Terminals (Northern) Ltd
- GB Terminals (Western) Ltd
- GB Terminals (Southern) Ltd
- GBA Transport Ltd
- GBA Technical Services Ltd
- GBA Technologies Ltd
- Euro Terminal Ltd



The Organisation currently operates in the following countries:

- United Kingdom
- India
- Ireland
- Turkey

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy**
 - The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact our Human resources department to raise any concerns in a confidential manner.
- **Employee code of conduct**
 - The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct**
 - The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy**
 - The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.



Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include but are not limited to the following:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through our audit team and requiring them to implement action plans where necessary

Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- Developing a system for supply chain verification expected to be in place by 31st December 2017 whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains expected to be completed by 31st December 2017 whereby the organisation evaluates all existing suppliers.

Training

The organisation requires supply chain managers HR professionals within the organisation to complete training on modern slavery.

The organisation's modern slavery training covers the following:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and



- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Managing Director Approval

This statement was approved on April 1st 2017 by the organisation's Managing Director who reviews and updates it annually.

Signature:

Sam Judah

01/04/17

Captain Sam Judah MBE - Managing Director