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Global Procurement Group Limited
Anti-Slavery and Human Trafficking Statement
2023

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 emission. We are therefore fully committed to ensuring that our organisation and our supply chain is free from slavery and human trafficking.

Recognising the importance of modern-day challenges such as slavery and human trafficking, we hold ourselves to the highest standards of accountability. As such, we are steadfastly committed to ensuring that not only our own organisation but also every facet of our supply chain remains untainted. Our dedication to prevent slavery and human trafficking goes beyond just meeting regulations; it is a fundamental aspect of our corporate responsibility and a testament to our belief in the worth and rights of all individuals.

This Statement is presented on behalf of Global Procurement Group Limited, and the entirety of its subsidiaries collectively, both in the UK and overseas, referred to as GPG herein. Additionally, the subsidiaries of GPG mandated to produce their individual statements under the Modern Slavery Act 2015, including NGP Utilities Limited, have embraced and endorsed this declaration.

This Statement relates to actions and activities during the financial year of January to December 2023.

As an ethical company, GPG respects every individual's human right and:

1. has a 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.

The GPG Statement applies to all UK subsidiaries of GPG 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 Limited, our energy procurement business, which assists its customers find the right utilities contracts for their businesses in France.

It also applies to their global supply chain.

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 operate from its headquarters in Gateshead (UK) and have offices in France, Malta and India and employees who operate from Belgium and Greece. 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 on-going 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, cancer research charity and homeless charities, and through involvement in charity projects and community initiatives.

Our Business

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

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

Our Supply Chains

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

When requiring any specific goods or services we do not pay in cash. Where appropriate, we require the budget holder to seek 3 quotes from different suppliers. The quotes are then submitted on a Purchase Request Form for approval by the budget holder. Once approval is given by the budget holder, the Treasury, Purchase Ledger and Procurement Manager will proceed with their thorough checks to ensure we comply with the security requirements. Once the expense has been approved and supplier selected, a purchase order number will be generated and given to the requestor of the good or service and the supplier.

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GPG also has a strict Sustainable and Ethical Procurement Policy which was updated to include a Supplier Code of Conduct. In line with the new Supplier Code of Conduct, GPG is committed to carrying out procurement activities in an environmentally, socially, ethically, and economically responsible manner and to enter into agreements and contracts with suppliers that share and adhere to its vision.

The standards within the Supplier Code of Conduct are derived from established global conventions and standards, including the United Nation's Sustainable Development Goals and International Labour Organisation Conventions. To ensure we are carrying out our activities in a responsible manner as a business we do the following:

- Ensure that suppliers and contractors are made aware of the Group's Sustainable and Ethical Procurement Policy and that they themselves have compatible policies for managing their environmental, social and economic impacts.
- Ensure that environmental, social and economic criteria are incorporated in the award of contracts.
- Evaluate the environmental, social and economic performance of suppliers and contractors.
- Work with suppliers and contractors to encourage improvements in their environmental, social, economic and ethical performance.

In line with the above we are also ensuring we are raising awareness amongst our employees by encouraging internal purchasers to review their consumption of goods with a view to procuring less and less often.

While our major suppliers are large UK or multinational firms who also have in place their own ethical business standards and anti-slavery and human trafficking policies and prevention measures, we require them to comply with our Supplier Code of Conduct and with relevant legislation as well as their ethical obligations, including in respect of anti-slavery, in the recruitment, management and compensation of their employees.

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 ensure that there is no slavery or human trafficking in our supply chains or in any part of our

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business. We continuously review and update all our policies and require all our colleagues to familiarise themselves with every key policy and provide training as part of the induction process and on an ongoing basis during employment.

In alignment with our ISO accreditation standards, the majority of our policies underwent comprehensive reviews in 2023. This meticulous process ensures that our practices are not only compliant but also reflective of our dedication to ethical and responsible conduct. As part of this ongoing commitment, we will review our anti-slavery and human trafficking policy again in 2024, demonstrating our proactive approach to addressing these critical issues.

The following policies set down 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 there is transparency in our own business and in our approach to tackling slavery and human trafficking 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 is not taking place anywhere in our supply chains. We are continuously looking at ways to improve our approach to combatting slavery and human trafficking, which includes but is not limited to reviewing this policy and its efficacy on an annual basis. Furthermore, we have been collaborating with Inclusive Employers to enhance our efforts in this crucial area. Through our subscription to Inclusive Employers, we have ongoing access to training, best practice recommendations and guidance on developing our inclusivity strategy.
- Our Whistleblowing Policy encourages all our colleagues to report any concerns related to our activities or the activities of our supply chains. All concerns raised 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.
- Our supplier Code of Conduct encourages all its customers and suppliers to report any concerns related to its activities and supply chain.
- Code of Conduct sets down 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.
- Sustainable and Ethical Procurement Policy, which is aligned with the commitments set out in GPG Corporate Social Responsibility Policy and integrates environmental and social responsibilities in all areas of the Group's activities.

Our policies require colleagues and suppliers to recognise the principles contained in our policies and adhere to them in all of 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.
- Using our independent external "SafeCall" service where anonymous reports can be made. The Safecall line provides an independent, confidential speaking out process for GPG colleagues to report any 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 and has continued to remain low in 2023. 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.
- In line with our onboarding process, we highlight and share the location of our policies with our new starters so they are informed of the Company's stance and have sound knowledge of where they can locate the information.
- Reviewing policies by ensuring they are up to date in line with current legislation.
- Educating all colleagues to ensure they can identify any scenarios of the 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 the business are using modern slavery best practises.

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. As proud members of Inclusive Employers, we are deeply committed to fostering a workplace culture that celebrates diversity and promotes inclusion at every level. Through our partnership with Inclusive Employers, we actively engage in initiatives and programs aimed at nurturing a diverse workforce and creating an environment where every individual feels valued, respected, and empowered to contribute their unique perspectives. As a global industry, we took part in Inclusion and Diversity week which was an opportunity to encourage open discussions and demonstrate to our stakeholders how we are evolving as a business.

Our commitment to diversity and inclusion is not just rhetoric; it is embedded within our policies, processes, and everyday practices. From recruitment and hiring to training and development, we prioritise inclusivity at every step of the employee lifecycle. We are discussing implementing even more robust diversity and inclusion training programs to raise awareness, challenge biases, and foster a culture of mutual

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respect and understanding. Additionally, our policies ensure equal opportunities for career advancement, fair treatment, and accommodations for employees of all backgrounds.

Furthermore, we continuously evaluate and refine our policies and practices to ensure they are aligned with best practices and reflect the evolving needs of our diverse workforce. Through regular reviews, feedback mechanisms, and employee engagement initiatives, we strive to create a workplace where everyone has the opportunity to thrive and reach their full potential, regardless of their background, identity, or abilities. At our core, we believe that diversity is not just a moral imperative but a strategic advantage that drives innovation, creativity, and sustainable growth. With that in mind, in 2023 we introduced employee driven forums, including a Women's Network, Pride Network, Multi-faith Network and in September 2023 ran various initiatives during National Inclusion Week and launched the Neurodiversity Network, to help increase awareness surrounding the natural variation in neurological traits and conditions among our employees but also all individuals who use GPG services.

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 resignation are voluntary.

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

- Carrying out a full review of colleagues' salary to investigate and reduce any ethnicity and gender pay gaps. We also monitor and publish our gender pay gap report.
- Promoting engagement within the colleague focused forums, including women, multi-faith and pride forum, to assist in improving equity and equality.
- Paying colleagues at least the minimum wage applicable to the country in which they work. In April 2023, GPG was awarded the accreditation of Real Living Wage Employer, for paying all of its employees the Real Living Wage. GPG remains committed to pay all colleagues at least the Real Living Wage in the UK and applied for renewal of its accreditation for 2024.

Further Steps and Due Diligence Processes for Slavery and Human Trafficking

We continuously review and refresh all 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 regarding 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 is not taking place in any parts of our business or supply chain including:

- requiring staff 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.

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- ensuring employees are paid equal 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 is fully committed to its implementation.

This statement has been approved & authorised by:

Name: Scott High

Position: Global People Director

Signature: