



Modern Slavery and Human Trafficking Statement 2018

Issue date

16/10/2018

This Statement applies to all Gapuma Holdings Limited Companies and their Directors, Officers, Employees, Consultants and Contractors in all countries in which Gapuma conducts business. Company refers to all Gapuma entities.

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

The statement sets down Gapuma's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Gapuma which are as follows:

- The back-to-back trading and distribution of commodity chemical as well as plastics and pharmaceuticals. The group also supplies a wide range of products through its procurement services to UK and other Governmental Agencies as well as undertaking local distribution in Ghana, Uganda and Ivory Coast

The Company currently operates in the following countries:

- United Kingdom (the main employment unit)
- Romania (account management for pharmaceutical manufacturers),
- Switzerland,
- The Netherlands
- Serbia (interactions within the agricultural market),
- China (procurement only)
- Ghana (direct sales and in country distribution),
- Nigeria, (direct sales)
- Ivory Coast (direct sales and in country distribution) and
- Uganda (direct sales and in country distribution).

As the group operates as a global sourcing business its direct concern with modern slavery is focused on the in-country distribution that occurs in West Africa. Through Gapuma UK's direct contact with the work force in these countries through frequent visits and the high professional standards that are set – through, in part, the ownership and maintenance of owned premises – the likely incidence of modern slavery is mitigated.

Threats to Human rights

It is acknowledged that the threats to human rights in supply chains in the UK will typically include:

- compulsory or forced labour;
- bonded labour;
- human trafficking;
- restrictions on freedom of association and the right to collective bargaining;
- poor, unhygienic or unsafe working conditions;
- illegal child labour;
- very low, or no, pay;
- excessive working hours;
- discrimination;
- harsh and inhumane treatment.

The countries in which we interact will have a different level of custom and financial benchmarking when it comes to accepted, appropriate employment practices and whilst we need to be cognizant of this we should not be blind to abuse and inhumane treatment.

Supply chain awareness

Our **upstream** supply chain stretches across more than 30 countries from China and South Korea in the East through to South America in the West.

Whilst these suppliers may only be short term relationships (and may not be the manufacturers themselves) we nonetheless include on all our purchase orders a statement that

'We expect our Suppliers to demonstrate a zero tolerance approach to exploitation and by accepting this order you are confirming to us that you follow applicable international standards such as OECD Guidelines, the UN Guiding Principles on Business and Human Rights, the Ten principles of the UN Global Compact and the UK Modern Slavery Act (2015).'

Our **downstream** supply chain stretches across more than 70 countries, over 30 of which are in Africa. As we supply to distributors and end users we are not in control of the final relationship for a manufacturing environment where exploitation is more likely to exist. Nonetheless we include as part of our terms of trade that are part of all our proforma sales invoices a statement that

'We expect our Clients to demonstrate a zero tolerance approach to exploitation and you acknowledge that by returning this proforma you are confirming to us that you follow applicable international standards such as OECD Guidelines, the UN Guiding Principles on Business and Human Rights, the Ten principles of the UN Global Compact and the UK Modern Slavery Act (2015).'

Gapuma does not knowingly support or deal with any business involved in slavery or human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to be aware of the emphasis that we place on the abhorrence of Modern Slavery and are requested to have reviewed the material contained on the Home Office web site (<https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page>) in particular the 17 types of Modern Slavery Offences in the UK set out in 'A Typology of Modern Slavery Offences in the UK'.

Corporate Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

Gapuma has had a long established set of policies that are reviewed regularly and codified in accordance with guidelines. The following current policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing policy** – the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Ethical Policy** – the Ethical Policy together with **Hospitality and Gifts Policy** sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 **Anti-money Laundering policy** and **Anti-Bribery Policy** – inform the behaviors expected when interacting with customers especially as the company interacts with high risk territories
- 2.4 **Corporate Social Responsibility (CSR) Statement** and **Environmental Policy** - summarises how Gapuma manages our environmental impacts and how we work responsibly with suppliers and local communities.

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Review and assessment

Gapuma's preference is to have long term relationships with suppliers and clients and by building these long-standing relationships and making clear our expectations of business partners in their transparent and open dealings with us.

The Company operates in accordance with ISO 9001 - 2015 and one of the areas that is considered as part of the compliance with the standard considers the relationship and information that we hold on our commercial partners and whether this highlights any matters that raise concern under this Statement.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Gapuma Holdings Limited, its subsidiaries and Sister companies endorses this policy statement and is fully committed to its implementation.

This Statement has been approved and authorised by:

Name: Jack Bardakjian
Position: Managing Director
Date: 16/10/2018
Signature: 