

Northern Gas & Power Ltd
Anti-Slavery and Human Trafficking Statement
October 2019

Introduction

At Northern Gas & Power Ltd we are passionate about doing business the right way, and thousands of businesses trust us to help manage their utilities. We are therefore fully committed to ensuring that our organisation and our supply chain is free from slavery and human trafficking.

Organisational structure and background

Northern Gas & Power Ltd is a leading independent utility cost management consultancy which provides energy procurement and energy management products and services to over 15,000 businesses throughout the UK, Europe, India, USA & Asia. We assist our partners in achieving better value from their energy contracts, reducing their energy consumption and lowering their carbon footprint. We currently employ over 500 colleagues, and operate from our headquarters in Gateshead and two other offices in the UK, France, USA, Malta, and India.

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, hospitals and homeless charities, and through involvement in school projects and community initiatives.

Our colleagues

We believe in One Northern Gas & Power Ltd supporting colleagues and working together. We operate a rigorous recruitment policy which adheres to all relevant employment legislation and follows industry best practice, and 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 individual's eligibility to work in the country in which they will be employed. We always pay colleagues at least the minimum wage applicable to the country in which they work. Our 'Code of Conduct' policy provides a clear set of rules for all colleagues, and sets out the standards of behaviour expected of them.

We have a strict purchase order procedure and we do not pay in cash for goods and services. Our major suppliers are large UK or multinational firms who have in place their own ethical business standards.

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. 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 are currently reviewing and refreshing 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.

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 with regard to their own anti-slavery and human trafficking measures.

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

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

This policy has been approved & authorised by:

Name: Scott High

Position: Global People Director

Signature:

