

## **Gould International UK Ltd Modern Day Slavery Statement 2019**

GIUK recognises that as a corporate body carrying on a business in the UK of supply of goods with a turnover in excess of £36 million there is an obligation to comply with the Modern Slavery Act 2015 and produce a Modern Day Slavery statement with an annual review within six months of financial year end 31<sup>st</sup> December.

### GIUK Structure, Business and Supply Chains

GIUK operates as a supplier of paper and paper management services to the publishing, greeting card, magazine, catalogue, retail publishing and catalogue sectors based in the UK and France from offices in Leatherhead and Paris. GIUK is the parent company of Gould Paper Sales, Gould Publication Papers and Harlech Print and Paper Management for whom this document serves as their MDS statement.

### GIUK Slavery and Human Trafficking Policy

Within the supply chains used by GIUK there should be no forced, bonded or involuntary prison labour and workers should not be required to lodge deposits or identity papers with their employers and should be free to leave their employer after reasonable notice. Modern slavery is not tolerated in any form.

### GIUK Slavery and Human Trafficking Due Diligence

A full listing of all vendors used in 2018 was generated to allow an analysis of all purchasing activity. Vendors were categorised under 5 business activities: business support, logistics, paper, packaging and print. The nature of the five activity types was also assessed for the likelihood of a prevalence of high levels of manual labour in low cost economies.

Each vendor grouping was assessed for geographic location where a location outside of the European Union (EU) and North America required further investigation. For paper, packaging and print vendors not holding either FSC <http://info.fsc.org/certificate.php> and or PEFC <http://www.pefc.org/find-certified/certified-certificates> Certification, which involves a third party on site audit working to a global Standard touching on social issues, further consideration of the vendor was required.

Vendors not holding FSC/PEFC certification and based outside of the EU and North America were then further assessed on a national basis making use of the 2018 Transparency Index Corruption Perception Index <https://www.transparency.org/cpi2018> and taking a score of less than 50 to be a high risk of corruption where slavery may exist relatively unchallenged.

GIUK Slavery and Human Trafficking Risk Assessment

The Due Diligence process generated six initial findings potentially in the high risk category that with further investigation reduced to one - paper manufacturer in Turkey. A desktop internet search revealed no evidence of slavery or similar negative news stories on the companies identified. A site visit has been made in 2018 and 2019.

**Turkey.** The Global Slavery Index report for Turkey indicates 48/167 for prevalence, 51.58 vulnerability score and the government response rates a B grade. 509,000 are estimated to be enslaved. The Transparency International CPI for Turkey is 40.  
<https://www.globalslaveryindex.org/2018/data/country-data/turkey/>

FSC International published a completed Centralized National Risk Assessment for Turkey 08.05.18 parts of which consider legal employment (1.12) and labour rights (2.2) which are scored as being specified risk. With the Turkish company being FSC certified these issues are addressed within the certification process.

GIUK Slavery and Human Trafficking Annual Review

These ongoing annual reviews, statements and staff training will serve to raise awareness of Modern Day Slavery within the company. Whilst there should be no complacency, it is the view of the Directors that the company supply chain is a predominantly technologically led sector with little scope for use of high labour inputs. The location of vendor operations is almost entirely within the EU and North America.

GIUK Slavery and Human Trafficking Staff Training and Awareness

Staff overview briefings across the business have been scheduled for 2019. Training is being given to staff who carry out vendor visits, so as to be alert to any indications of Modern Day Slavery.

Approved by the Board of Directors

Signed: 

Dated: 20/6/2019.

**What is modern slavery?** (source [www.antislavery.org](http://www.antislavery.org))

Someone is in slavery if they are:

forced to work by mental or physical threat,  
owned or controlled by an employer, usually by mental or physical abuse or threat of abuse,  
dehumanised, treated as a commodity or bought and sold as property,  
physically constrained or has restrictions placed on freedom of movement.

**What is human trafficking?**

Human trafficking involves men, women and children being brought into a situation of exploitation through the use of violence, deception or coercion. People can be trafficked for many different forms of exploitation such as forced labour, forced prostitution, forced begging, forced criminality, domestic servitude, forced marriage, forced organ removal. Simply bringing children into exploitative conditions constitutes trafficking.

**What is the scale of modern slavery?** (source [www.globalslaveryindex.org](http://www.globalslaveryindex.org))

It is estimated that some 40.3 million men, women and children are in modern slavery, although figures are difficult to arrive at with assured accuracy. ILO and Walk Free Foundation work together with Global Slavery Index to produce these estimates.

**Where does modern slavery occur?**

Nowhere in the world is free of modern slavery, but some parts of the world have particularly high incidence of modern slavery often allied to governance, lack of basic needs, inequality, disenfranchised groups and conflict. The top countries regionally by prevalence are N Korea, Afghanistan, Pakistan; Belarus, Turkmenistan, Macedonia; Syria, Iraq, Yemen; Eritrea, Burundi, Central African Republic; Venezuela, Haiti, Dominican Republic;. The top 5 products at risk of slavery imported into G20 are computers/phones, garments, fish, cocoa and sugar cane.

136,000 people are estimated to be in slavery in the UK (0.002% of the population) whilst there are about 8 million in India (0.006% of the population).

**More Information.**

Further information and guidance is available from the Modern Slavery Helpline on 0800 0121 700, which is provided by the UK Government.

**How you can identify that someone is in slavery and what you should do.**

Slavery is often hidden and can be difficult to identify, but there are few signs which might mean that someone is in slavery. Someone in slavery might:

appear to be in the control of someone else and reluctant to interact with others,

not have personal identification on them,

have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work,

not be able to move around freely,

be reluctant to talk to strangers or the authorities,

appear frightened, withdrawn, or show signs of physical or psychological abuse,

be dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.

If you believe you have spotted someone who might be in slavery, you can call the Modern Slavery Helpline on 0800 0121 700 or call the police or Crimestoppers. Do not try to intervene on your own as it might make the situation of that person worse.