

Gould International UK Ltd Modern Day Slavery Statement 2015-16

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.

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 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 2015 was generated to allow an analysis of all purchasing activity. Vendors were categorised under 4 business activities: business support, logistics, paper and print. The nature of the four 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 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 2015 Transparency Index Corruption Perception Index <https://www.transparency.org/cpi2015#results-table> 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 two findings potentially in the high risk category - a printer in Turkey and a paper manufacturer in India. A desktop internet search revealed no evidence of slavery or similar negative news stories on either of the two companies.

Using the Global Slavery Index search by country facility <http://www.globalslaveryindex.org/country/india/> indicates India to be ranked 5/165 in prevalence, but paper is not a sector of prevalence; a 56.7 vulnerability score; the government response rates a CCC grade. 14,285,700 are estimated to be enslaved.

<http://www.globalslaveryindex.org/country/turkey/> indicates Turkey to be ranked 105/165 in prevalence; a 50.9 vulnerability score; the government response rates a CCC grade. 185,500 are estimated to be enslaved.

GIUK Slavery and Human Trafficking Annual Review

This first statement and the proposed 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 2016. More in depth 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: 18/2/2016

Directors:
David H. Berkowitz - Chief Executive Officer (USA)
Edward L Silver - Chief Financial Officer (USA)
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What is modern slavery? (source 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.globalsslaveryindex.org)

It is estimated that some 35.8 million men, women and children are in modern slavery, although figures are difficult to arrive at with assured accuracy. ILO suggests 21 million, Walk Free Foundation suggests 29.8 million.

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. Five countries account for 61% - India, China, Pakistan, Uzbekistan and Russia.

8,300 people are estimated to be in slavery in the UK (0.0013% of the population) whilst there are about 14 million in India (1.14% 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.