

# MODERN SLAVERY STATEMENT



GAP GROUP LTD is proud of the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains or in any part of our business.

In accordance with section 54, part 6 of the Modern Slavery Act 2015, and section 4 of the Human Trafficking and Exploitation (Scotland) Act 2015, this statement sets out the steps that GAP Group Ltd has taken to ensure that slavery, human trafficking, servitude and forced or compulsory labour, is not taking place in our supply chains or in any part of our business. This statement covers the activities of GAP Group's wholly owned subsidiaries including ACE Hire & Sales Ltd and 4Hire Ltd and is in respect of the GAP Group Ltd financial year ended 31 March 2025.

## OUR ORGANISATION

GAP Group Ltd is the UK's largest family-owned and run equipment hire company with 10 Divisions and almost 200 locations across the UK. We have over 2000 employees, all of whom are based in the UK. Our staff are largely directly employed and are not in any category which is generally seen to be vulnerable to modern slavery in this country, so our focus is to ensure there are policies and procedures in place for our contractors and suppliers.

## OUR SUPPLY CHAIN

We firmly believe human trafficking, forced, debt bonded, indentured, slave and child labour are unacceptable, and we are fully committed to preventing these practices occurring in our operations and supply chain. The products available for hire or for sale are sourced from a broad range of UK based reputable suppliers. Some of our products are manufactured or sourced overseas but we have no direct dealings with these sources of supply. We will always deal with the UK based subsidiaries of these organisation.

We have two categories of supplier – 'Preferred' and 'Authorised' and we expect our valued suppliers to undertake all reasonable and practical steps, including factory, warehouse and tied accommodation inspections and audits to ensure that our standards are being implemented throughout their businesses and that local legislation and regulations are complied with. We will assess any instances of non-compliance on a case-by-case basis and will then tailor remedial action appropriately. We will only trade with those suppliers who fully comply with this policy or those who are taking verifiable steps towards compliance.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that practices of modern slavery or human trafficking found in our supply chains, or in any part of our business, are eradicated as we are strongly opposed to these practices.

Our Anti-Slavery Policy 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.

All Group recruitment activity is handled by our dedicated in-house recruitment team in line with our Recruitment Policy ensuring that all associated legislation is controlled and managed effectively.

Trust, integrity and honesty underpin our national operations, and our people are committed to the 'GAP Code'. Our values of Communication, One Team, Dedication and Commitment are the pillars of our culture. They embody everything that we do at GAP and how we do business. They outline the expectation of our people's behavior with colleagues, customers and suppliers.

Our Whistleblowing Policy encourages staff to report concerns including any related to modern slavery/trafficking and child or forced labour.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk, GAP Group has a number of procedures to address modern slavery risk:

- A 'Modern Slavery Policy' for our people which sets out the key issues and how we should respond including a process for raising concerns internally
- A 'Whistleblowing Policy' which details how employees should report concerns internally and externally
- We are currently developing a 'Procurement Policy' for how we deal with suppliers and a 'Supplier Code of Conduct' for use by our suppliers making clear the standards we expect

## **SUPPLIER ADHERENCE TO OUR VALUES**

We are strongly opposed to modern slavery, child labour and human trafficking. We are committed to eradicating these should they be found in any element of our business or supply chain. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance program. This consists of:

- A review of the "Child Labour Index" published by the International Labour Organisation which helps pinpoint those countries where children are deemed to be "at risk" of exploitative labour.

- A review of the origins of products supplied to us via third-party importers.
- A review of case studies exploring the challenges faced by organisation and the good practice actions taken to resolve them.

We have a dedicated compliance team, which consists of involvement from the following departments:

Audit and Compliance

Human Resources

Procurement

Commercial

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide guidance and advice to those teams who have direct responsibility for recruitment, procurement and compliance both at induction and periodically thereafter.

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. It is worth noting that we are not involved in the direct importation of goods and services with this activity being undertaken by third parties; normally the UK-based subsidiaries of our key suppliers.

- For existing suppliers, we make them aware of our requirements
- For new suppliers, we check their processes and working conditions
- Our policies are available for review
- We expect our suppliers to improve working conditions and to remove children from being exploited
- We expect our suppliers to be aware of those countries where children are deemed to be “at risk”
- We expect our suppliers to increase awareness throughout their supply chain of slavery and human trafficking
- We expect our suppliers to undertake regular internal and /or external audits of their supply sources and to take the appropriate corrective measures where necessary

## **FURTHER STEPS**

Following a review of the effectiveness of the steps we have taken to ensure that modern slavery or human trafficking is eradicated from our supply chains, we intend to take the following further steps to combat modern slavery and human trafficking:

- We continue to monitor our suppliers to ensure compliance
- We will de-select and remove from our database those suppliers who fail to comply
- No products or services are currently sourced/to be sourced from the 10 worst offending nations
- We will continue to monitor those offending nations beyond the above worst offenders

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and section 4 of the Human Trafficking and Exploitation (Scotland) Act 2015, and constitutes our Group's slavery and human trafficking statement for the financial year ending March 2025.

## **APPROVAL**

This statement has been formally approved by the Board of Directors of GAP Group Ltd and signed on their behalf.



**Douglas Anderson**

Joint Managing Director



**Iain Anderson**

Joint Managing Director

May 2025