 T: 0191 414 2882 F: 0191 414 1855 www.upnorthgroup.com	Document Name:	Modern Slavery Statement
	Document Ref:	D-1006
	Issue:	1
	Authoriser:	Managing Director
Friday, 5 January 2018		

Modern Slavery Statement

This statement applies to GastroNorth Limited (referred to in this statement as 'the company'). The information included in the statement refers to the financial year 2017-2018

GastroNorth Limited operates from one centralised office location. All employees are under the direct employment of Upnorth and are employed on a permanent contract.

The company structure can be identified within the corporate organogram & management plan

Head Office Location

Merlin House
Princes Park
Princes Way
Team Valley
Gateshead
NE11 0NF

As an electrical and mechanical services company Upnorth provides both planned and reactive maintenance as well as project delivery to all aspects of building services, these services include but are not limited to:

HVAC
Refrigeration
Catering Equipment
Electrical Distribution

The works undertaken by office based staff and mobile engineers are consistent throughout the year with no seasonal requirement or influence.

The labour supplied to the GastroNorth Limited in pursuance of its operation is carried out in all regional locations across the United Kingdom

C) DEFINITIONS



The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

GastroNorth Limited acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

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No labour provided to the company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom

E) SUPPLY CHAINS

We understand that in order to fulfil its activities, GastroNorth Limited first tier suppliers, include those related to the supply of materials equipment and associated services as identified in our opening statement above, be it manufacture or wholesale supply, are intermediary traders and therefore have further contractual relationships with lower-tier suppliers

F) POTENTIAL EXPOSURE

In general, the company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) STEPS

The company carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the company has taken the following steps to ensure that modern slavery is not taking place:

- A review of the companies supply chain has identified we are not tied in to any agreement which could not be terminated in the event that the supplier is, or is suspected, to be involved in modern slavery;
- The company has identified and assess the potential risks in its supply chains, a second tier supplier is available and in place in the event a supplier is, or is suspected, to be involved in modern slavery;
- The company has impact assessed its services upon potential instances of slavery and foresee no potential for reduction in service;
- During the induction process and ongoing training all policies are reviewed and reiterated to employees
- The company has a zero tolerance policy towards modern slavery;

H) KEY PERFORMANCE INDICATORS



The company has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in GastroNorth Limited or its supply chains.

- Supplier Pre-Qualification Questionnaires are completed by all existing and new suppliers.
- Annual review of all employees will be undertaken and training provided were necessary.

I) POLICIES

The Company has the following policies which further define its stance on modern slavery

Corporate Social Responsibility Policy
Recruitment Policy
Supplier Vetting and Assessment

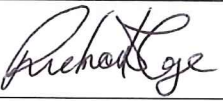
 Upnorth[^] Group <small>Environmentally Powerful</small>	 GastroNorth[^] <small>Foodservice Systems</small>	Document Name:	Modern Slavery Statement
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		Issue:	1
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T: 0191 414 2882 F: 0191 414 1855 www.upnorthgroup.com		Friday, 5 January 2018	

J) SLAVERY COMPLIANCE OFFICER


The Company has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to GastroNorth Limited obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

VALIDATE & AUTHORISE DOCUMENT

Signed		Print	Richard Teye
Position	Director	Date	05/01/2018

WITNESS REGISTRATION

Signed		Print	Darren Hall
Position	Operations Manager	Date	05/01/2018

