

# Gaffer Group

## Modern Slavery Policy Statement: financial year ended 31 December 2021

### Introduction

1. As an organisation, we take a zero tolerance approach to offences under the Modern Slavery Act 2015 or indeed to any violation of human rights. We require the same from our suppliers, contractors and anyone else that we do business with.
2. We are committed to upholding the principles and objectives of the Modern Slavery Act 2015. Ensuring that we have a reputable and dependable supply chain helps safeguard the reputation and integrity of our business and enables us to continue to operate a high standard of service to our customers.

### Organisation structure

3. Gaffer Group comprises a number of trading companies which include:

Gaffer (NI) Limited	Dessian Products Limited
Gaffer Trading Limited	Windowmate (NI) Limited
NI Trucks Limited	Inish Properties Limited
Emerald Truck and Van Limited	Gaffer Investments (Ireland) Limited
Star Rentals Limited	ASM Financial Planning Limited
TVC Parts Limited	Douglass Windows (PVCU) Ltd

4. Gaffer Group has approximately 340 staff working across 8 locations in the UK and Ireland who ensure the continued success of the individual businesses.

### Our business

5. The group's key activities involve:
  - sale, service and parts supply of commercial vehicles
  - rental of commercial vehicles
  - manufacture of uPVC windows, doors and conservatories
  - sale of uPVC windows and doors
  - sale and fitting of windows and doors
  - investment in commercial property
  - financial advisory services

### Our policy on slavery and human trafficking

6. Gaffer Group is committed to ensuring that there is no modern slavery or human trafficking in any part of our business and we require our suppliers to have similar principles and practices designed to ensure that this does not happen. The group's procurement process includes supplier risk assessments which are undertaken periodically to ensure effective compliance.

### Awareness and training

7. We place responsibility on every colleague within our business to uphold our legal and ethical obligations. A copy of this policy statement is accessible to all employees on company notice boards, or on the company Intranet.
8. All managers are responsible for ensuring that we comply with the legislative and regulatory requirements. This includes giving consideration to modern slavery factors when making procurement decisions and to developing an awareness of modern slavery issues through training of staff.
9. This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Gaffer Group's anti-slavery and human trafficking statement.



Stephen Sproule  
Chairman  
7 January 2021