



Modern Slavery and Human Trafficking Statement

About us and our supply chains

TGBN Ltd is a small family run privately owned business based in Hebden Bridge, West Yorkshire.

Our main business is Environmental Consultancy, particularly offering Packaging Compliance services to companies obligated by the Producer Responsibility Obligations (Packaging Waste) Regulations. We operate 3 packaging compliance schemes: Pennine-Pack, Pennine-Pack (NI) and Ethical Compliance. We also offer general Environmental and IT consultancy.

The most significant area of spend for our business is on purchase of Packaging Recycling Certificates (PRNs). PRNs are certificates which are issued by recyclers to certify that they have recycled a tonne of packaging waste. We buy these certificates on behalf of our customers so that they can demonstrate that they have met their obligations under the Producer Responsibility Obligations (Packaging Waste) Regulations 2007.

We buy most of our PRNs through brokers in the UK. We also buy directly from UK recyclers and exporters of packaging waste. Exporters may be exporting waste to any country in the world to be recycled. When we buy PRNs from an exporter we have no way of knowing where the recycling took place, but we know that Europe, India and China have historically been popular destinations for UK waste.

About Our Policies

We are passionate about raising awareness within our organisation of the issues of modern slavery and human trafficking, and about reducing the risk of it in our supply chains. We were founder members of the 'Slave Free Alliance' and have used their Self Assessment tool to identify areas of improvement in our business.

Modern slavery and human trafficking is identified as a key goal in our Sustainability Strategy. We have put in place a Modern Slavery Policy and are in the process of updating our Ethics Policy and Purchasing Policy to include appropriate references to modern slavery and human trafficking.



The GBN is a brand name of TGBN Ltd.

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Risk Assessment

The risk of modern slavery and human trafficking within our business is exceptionally low as we are a small business. Currently all our employees are family members. When taking on new staff we are mindful to carry out due diligence checks. We occasionally subcontract work to specialist sub-contractors. These are usually individuals that we have known for many years.

In terms of the risk of modern slavery and human trafficking in our supply chain - we have carried out an analysis of our supply chain and have identified that purchase of recycling certificates (PRNs) is the most significant area in terms of amount spent. This is also an important area of focus as the waste industry is particularly high risk in terms of organized crime. The price of PRNs has increased dramatically in the last few years which might increase the attractiveness of this sector for criminals.

We know that it is harder to influence the supply chain outside the UK, and we already have policies and targets in place to increase the proportion of PRNs which we buy from UK recyclers. We are also in the process of engaging with our most significant suppliers to raise awareness of Modern Slavery issues.

As a small business our influence on suppliers may be small, but we are committed to do everything we reasonably can to help to eliminate modern slavery and human trafficking.

Training

All employees have received training on modern slavery and human trafficking, covering the signs to look out for and what to do if they suspect Modern Slavery.

Approval

This statement was approved by the directors of TGBN Ltd on 25 May 2021.

Jane Mooney (Director)

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