

Title: **ANTI SLAVERY & HUMAN TRAFFICKING STATEMENT**

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Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. *We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.*

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

## **OUR ORGANISATION**

This statement is made by each of the following trading entities (collectively referred to as the "EVO Group of Companies"):

- VOW Europe Limited;
- Banner Group Limited (trading as Banner, WA Office, Ventura, Subec and Spectrum);
- Truline Logistics Limited;
- Banner Business Solutions Limited;
- VOW Retail Limited; and
- Business Office Supplies Limited.

The EVO Group of Companies is a multi channel distributor of business supplies and operates throughout the United Kingdom and the Republic of Ireland. Unless otherwise stated, this statement includes the steps each of the above listed entities has taken during 2018 in order to minimise the risk of modern slavery or human trafficking. This statement is made collectively by the EVO Group of Companies and also individually by each entity listed above as if each entity is making a separate statement. The registered office of all the above entities is K House, Sheffield Business Park, Europa Link, Sheffield, S9 1XU. The EVO Group of Companies has a collective annual turnover of more than £36 million.

**OUR BUSINESS** Our business is made up of several different channels including a direct channel, which supplies goods and services directly to end users, and the indirect channel, which supplies goods and services to resellers. We have a number of warehouses and offices across the UK and Ireland.

**OUR SUPPLY CHAINS** Our supply chains are extensive and encompass many global suppliers, agents, contractors and resellers.

**OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING** We are committed to ensuring our supply chains and/or any part of our business is free, as far as possible, of any form of modern slavery or human trafficking. As part of our commitment to achieving this, we have in place an Anti-slavery Policy and a Corporate Social Responsibility Policy (CSR) (the "Policies"). *The Policies reflect 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 and /or in our business.* As part of our CSR policy we are committed to source goods and services from persons and firms that achieve internationally recognised standards and practices in dealing with their workers and their working environment. New suppliers are asked to sign up to the CSR Policy as part of our ongoing relationship. All employees, customers, suppliers, agents are subject to our Anti-Slavery Policy, which is incorporated into the relevant contracts.

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

Our Terms and Conditions of Purchase require our vendors to implement due diligence procedures for their own suppliers

and subcontractors, to ensure that there is no slavery or human trafficking in its supply chains. Vendors must also undertake not to purchase any raw materials or products that have been sourced from producers or manufacturers using forced labour in their operations.

To continue our initiative to identify and mitigate risk, we have now written to over 90% of our live suppliers asking them to confirm, amongst other things, the steps they have taken to ensure human trafficking or modern slavery is not taking place in their supply chain. We have also asked them to provide details of the parts of their business which are of potential risk and explain the steps they have taken to minimise or monitor such risks. Each letter is being followed up proactively and our aim is to ensure that a satisfactory response is received from all of our suppliers.

We have updated our supplier onboarding processes and all new suppliers are required to provide information about their supply chains and to confirm compliance with the Policies.

## **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 have provided training to our staff.

## **CONTRACTS**

To ensure continued adherence and commitment to tackling modern slavery and human trafficking we have updated our standard terms and conditions, imposing an obligation on the customers of VOW Europe Limited to adhere to the Anti-slavery Policy, or have in place a similar policy, that is no less onerous than the Anti-slavery Policy. Our terms and conditions also oblige our customers to not engage in any activities that constitute modern slavery or human trafficking.

VOW Europe Limited (whom also purchases most products on behalf of Banner Group Limited, VOW Retail Limited, Truline Logistics Limited, Business Office Supplies Limited and Banner Business Solutions Limited) has updated its standard terms and conditions with suppliers thereby placing a legal obligation on suppliers to comply with the provisions of the Modern Slavery Act 2015. Banner Group Limited, VOW Retail Limited, Truline Logistics Limited, Business Office Supplies Limited and Banner Business Solutions Limited are satisfied that VOW Europe Limited has taken sufficient steps to minimise the risk of modern slavery or human trafficking in their supply chain.

## **FURTHER STEPS**

Following a review of the effectiveness of the steps we have taken; we intend to take the following further steps as part of our efforts to continuing to combat slavery and human trafficking:

- Contact the remainder of our existing suppliers and new suppliers as part of our continued due diligence process;
- To collate and review the due diligence responses received from our suppliers and investigate any unsatisfactory responses;
- Review, and update if necessary, our supplier tender documents to ensure greater transparency from our suppliers of their supply chain;
- Continue to provide staff training; and
- Investigate any reports we may receive in respect of modern slavery taking place in our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes EVO Group of Companies' slavery and human trafficking statement for the financial year ending 2018.

Signature:

A handwritten signature in black ink, appearing to be 'SHE', written over a horizontal line.

A director for and on behalf of VOW Europe Limited, Banner Group Limited, Banner Business Solutions Limited, Business Office Supplies Limited, Truline Logistics Limited and VOW Retail Limited.

Date: 20<sup>th</sup> September 2019