



## **ANTI SLAVERY & HUMAN TRAFFICKING STATEMENT 2021-22**

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"):

- EVO Business Supplies Limited (parent company)
- 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
- Premier Vanguard 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 2020 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 the parent company EVO Business Supplies Limited is 1<sup>st</sup> Floor, 1 Europa Drive, Sheffield, S9 1XT. The EVO Group of Companies has a collective annual turnover in excess of £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, with a total of 1,669 employees across the group as at the date hereof.

### **OUR SUPPLY CHAINS**

Our supply chains are extensive and encompass many global suppliers, agents, contractors and resellers. We source office products and business supplies with approximately 44% of the products we source being manufactured in Europe. Generally, we consider that our business and our supply chains are of low risk of modern slavery. Some supplies from some areas within Asia are considered of higher risk and we pay particular attention to supplies from these countries in our due diligence.

### **STEPS WE TAKE TO ADDRESS RISKS OF MODERN SLAVERY:**

#### **1. 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. We are also committed to sourcing goods and services from businesses that



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achieve internationally recognised standards and practices in dealing with their workers and their working environment. As part of our commitment, 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. All employees, customers, suppliers, agents are subject to our Anti-Slavery Policy and our CSR Policy, which are incorporated into the relevant contracts.

As part of our 'onboarding process for new suppliers, all new suppliers are required to adhere to our Policies as part of our ongoing relationship.

### 2. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Our Terms and Conditions of Purchase require our suppliers to implement due diligence procedures for their own suppliers and subcontractors so as to ensure that there is no slavery or human trafficking in their own supply chains. Suppliers are also required to commit to not purchasing any raw materials, component parts or products which 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 all 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. Otherwise, we are pleased to report that none of our enquiries with our suppliers have led to the discovery of any instances of malpractice or anything that breaches our Policies.

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.

### 3. BUSINESS SPECIFIC CONTRACTS

To ensure continued adherence and commitment to tackling modern slavery and human trafficking we have updated our standard terms and conditions of sale, imposing an obligation on all customers of each group trading company to adhere to the Anti-Slavery Policy, or have in place a similar policy, which achieves, as a minimum, the standards set out in our 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 of purchase 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.

In relation to the Covid-19 pandemic, as a group we have had to adapt our working practices in line with UK Government restrictions, guidelines and evolved best practice. We have also exercised a reasonable degree of discretion with certain suppliers, so as to enable continuity of supply (albeit with slightly longer lead times) but whilst not cutting corners with our Policies and supplier due diligence.



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**4. 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, which will be repeated in the forthcoming year.

**5. 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:

- Further Modern Slavery Act training for relevant staff who are engaged in the procurement of products and services;
- To review, and update if and as necessary, our supplier Code of Conduct to ensure greater transparency from our suppliers;
- Introduce random spot checks whereby we select a supplier at random and carry out a Modern Slavery compliance check / audit to ensure compliance; and
- As part of our ongoing program to ensure not only compliance but a higher level of supply chain diligence, 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 the EVO Group of Companies' slavery and human trafficking statement for the financial year ending 31 December 2020.

Signature: .....

Name: Stephen Haworth

Office Held: Chief Executive Officer of EVO and a director for and on behalf of EVO Business Supplies Limited, VOW Europe Limited, Banner Group Limited, Banner Business Solutions Limited, Business Office Supplies Limited, Truline Logistics Limited, VOW Retail Limited and Premier Vanguard Limited.

Date originally signed: 25<sup>th</sup> June 2021

Re-signed: 25<sup>th</sup> November 2021