



ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT 2022-23

Modern slavery (just like any form of 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. It can be obvious but it can also be very subtle and hard to detect and, if detected, stopped and prevented from recurring.

At **EVO** we have a zero-tolerance approach to modern slavery. 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 that, as far as we can 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 and, from 25 May 2022, also trading as Staples.co.uk)
- Banner Advantage Limited (trading as Banner and Staples.co.uk until 25 May 2022)
- 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 2021 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 1st 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 and eCommerce / online operations. We have a number of warehouses and offices across the UK and Ireland, with a total of 1,705 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 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 (as far as possible) slavery and human trafficking is not taking place anywhere in our supply chains and/or within our business. All employees, customers, suppliers, agents and consultants 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.



In order to continue to identify and mitigate risk, and building on our contact with all of our live suppliers sent in 2020-21 (as stated in our prior statement, we wrote 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 shall be doing this with all of our new suppliers. We have also asked them (or will be asking them in the case of new suppliers) 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 or subsequent contact is being followed up proactively and our aim is to ensure that a satisfactory response is received from all of our suppliers, current and new ones alike. Otherwise, we are pleased to report that again, as we reported in our prior statement, none of our enquiries with any of our suppliers have led to the discovery of any instances of malpractice or anything that breaches our Policies.

We have maintained (and will continue to do so) our updated 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 (which purchases most products on behalf of Banner Group Limited, Banner Advantage 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, Banner Advantage 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 and our and society's emergence from the associated restrictions that were, in nearly all settings, lifted on 01 April 2022, as a group, during the pandemic restrictions period, it was necessary for us to adapt our working practices in line with UK Government restrictions, guidelines and evolved best practice. During this time, we 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.

However, going forwards, as we return to pre-Pandemic levels of business activity, we are reverting our pre-Pandemic levels of Modern Slavery Act due diligence, wherever and whenever we can, in all settings, bearing in mind the added constraints upon all businesses caused by rises in inflation and the situation in the Ukraine.



4. TRAINING

To ensure an appropriately 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 since our prior statement, 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 – due to unforeseen business challenges since our prior statement, this remains an ongoing piece of work that we aim to complete prior to our next statement;
- Continue doing the random spot checks introduced last year (whereby we select a supplier at random and carry out a Modern Slavery compliance check / audit to ensure compliance); and
- Continue 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.
- A group Corporate Social Responsibility Charter will be launched in 2022 featuring a theme relating to ‘enhanced supplier compliance’ to further support our Modern Slavery due diligence.

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 2021 and the period thereafter until our next group statement is due (by the end of June 2023).

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 Advantage Limited, Banner Business Solutions Limited, Business Office Supplies Limited, Truline Logistics Limited, VOW Retail Limited and Premier Vanguard Limited.

Date signed: 07 June 2022