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## ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT 2023-24

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 reoccurring, or from re-starting in a different form.

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)
- Banner Group Limited (trading / operating as Banner, Truline and incorporating WA Office, Ventura, Subec and Spectrum and, from 25 May 2022, also trading online as Staples.co.uk)
- VOW Europe Limited (trading / operating as VOW Wholesale and Truline)
- Banner Advantage Limited (trading as Banner and Staples.co.uk from 03 October 2022 until 25 May 2022 when its trading activity was hived up to Banner Group Limited as part of our ongoing corporate simplification programme)
- Banner Business Solutions Limited (which, since 09 January 2023, following its acquisition of certain of the business and assets of CB Realisations Limited (formerly Complete Business Solutions Group Limited) (in administration) and certain of the business and assets of its group trading companies (in administration), has traded as Complete) (“**Complete**”)
- VOW Retail Limited
- Premier Vanguard Limited (trading as premvan)
- Business Office Supplies Limited



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The **EVO** Group of Companies is a multi-channel distributor of business supplies and operates throughout the United Kingdom and the Republic of Ireland.

Other than in respect of Complete – which is an area of the business that we are still integrating into the group and which will require a specific programme of activity to align its processes with those of the rest of the group – this statement includes the steps each of the above listed entities has taken during the twelve month period prior to this statement 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 (save that, since 25 May 2022, Banner Advantage Limited has not been an active trading company in the group).

The registered office of the group’s 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 and eCommerce / online operations. We have a number of warehouses and offices across the UK and Ireland, with a total of 2,146 employees across the group as at the date of this statement.

## **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 47% 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.



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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. In situations where our suppliers or customers require us to adhere to their Anti-Slavery policies and/or their CSR policies, we ensure these are at least as stringent as our own policy/ies and procedure(s).

As part of our 'onboarding' process for new suppliers, all new suppliers are required to adhere to our Policies as part of commencing trading with us and throughout our ongoing relationship. Where any prospective new supplier does not accept our policies (because they insist on usage of their own), we take steps to ensure that their policies and procedures are at least as stringent as our own, or we do not deal with them as a supplier.

## **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 previously, (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 continuing to do this with all of our new suppliers.

We are also developing new processes around UK and European suppliers and re-assessing the risk(s) in the extended supply chain (beyond the UK and Europe and, once again, we are pleased to report that, 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.



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### 3. BUSINESS SPECIFIC CONTRACTS

To ensure continued adherence and commitment to tackling modern slavery and human trafficking we continue to use our standard terms and conditions of sale or appropriate other terms as required by our customers. Such terms impose 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.

We continue to use our updated standard terms and conditions of purchase with suppliers or appropriate other terms (where required) thereby placing a legal obligation on our suppliers to comply with the provisions of the Modern Slavery Act 2015.

We are satisfied this approach places the required legal obligation(s) on our suppliers and that, in conjunction the application of our policies and procedures, this ensures we have taken sufficient steps to minimise the risk of modern slavery or human trafficking in our and our suppliers' supply chains.

Going forwards, as we return to pre-Pandemic levels of business activity, we have reverted to our pre-Pandemic levels of Modern Slavery Act due diligence in all settings, bearing in mind the added constraints upon all businesses caused by rises in inflation and the continuing 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 continue with our approach and to take the following steps as part of our efforts to continue to combat slavery and human trafficking:

- General steps for all EVO group companies apart from Complete
  - Further Modern Slavery Act training for relevant staff who are engaged in the procurement of products and services.



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- 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).
  - Continue our ongoing programme 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.
  - Following the successful launch of the group’s Corporate Social Responsibility Charter in 2022, featuring a theme relating to ‘enhanced supplier compliance’ to further support our Modern Slavery due diligence, we intend to look at additional ways to enhance our processes.
  - Specific programme for Complete
    - Following the initial spell of activity to stabilise and establish Complete as a functioning business since the date of acquisition (09 January 2023), the group has decided to carry out a detailed audit of all suppliers and their policies and procedures for preventing and combating modern slavery and human trafficking (in any form) in their supply chains.
    - This will involve additional steps as we align all of Complete’s processes with those of our group.
    - The first stage will be to carry out an audit of Complete’s present trading with its suppliers, some of which are also suppliers to other group companies.
    - The second stage will be to implement such policy and process changes as are required to align Complete’s process with those of our group.
    - The third stage, which we anticipate carrying out in parallel with the first and second stages we have identified, will be to provide all Complete staff with appropriate Modern Slavery Act training.
    - At this stage, we feel it is an impossible task (beyond the scope and purpose of this statement) to set out the full details of this forthcoming specific programme for Complete in this statement and, accordingly, we shall provide an update in our next statement.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015.



This statement constitutes the EVO Group of companies' anti slavery and human trafficking statement for the financial year ended 31 December 2022.

Furthermore, this statement covers additional matters, namely steps we intend to take in the next twelve months until our next statement is due (by the end of June 2024).



Signature: .....

Name: Andrew Gale

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

Date signed: 19 June 2023