



Modern Slavery and Human Trafficking Statement and Policy for Financial Year 2019

The Spicers-OfficeTeam Group Limited and its subsidiaries (“the Company”) remain committed to ensuring that its business dealings are carried out in compliance with the relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that we have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chains.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We have a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

The Company

This statement covers the following trading companies:

- The Spicers-OfficeTeam Group Limited – holding company
- Spicers Limited – wholesale channel
- OfficeTeam Limited – direct channel
- ZenOffice Limited – direct channel

The Company operates throughout the United Kingdom and the Republic of Ireland.

The Company’s supply chain is complex and encompasses a number of global suppliers.

Policies on Slavery and Human Trafficking

The Company operate the following policies which describe our approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing policy:** the Company encourages all staff, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.



- **Employee code of conduct:** The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Supplier code of conduct:** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship. Any supplier found in breach of the code of conduct in relation to slavery and human trafficking will be requested to stop the procedure immediately. Failure to do so will result in immediate termination of supply of goods to SPOT.
- **SPOT Supplier Information & SPOT Supplier Assessment Audit:** The Company has put in place a supplier assessment programme to ensure that suppliers can demonstrate compliance with all relevant legislation and our Supplier Code of Conduct.
- **Corporate Social Responsibility:** The Company recognises that good CSR encompasses all aspects of sustainable development and the way we affect people through our business operations. The CSR strategy covers: ethical trading, human rights, corporate responsibility and environmental responsibility.
- **Ethical Strategy:** The Company approach to purchasing has a direct on the lives of people all over the world and we are therefore committed to doing business in a way which ensure that everyone in our supply chains benefits from trading with us.

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our Suppliers

The Company operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and on site audits (where relevant) which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.



3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Responsibilities

Responsibility for the Company's anti-slavery initiatives is as follows:

Policies: The Company Secretary is responsible for putting in place and reviewing policies.

Risk Assessment: The Group Purchasing Director together with the Company Secretary are responsible for analysis of the risks of human rights and modern slavery.

Investigation/Due Diligence: the Purchasing Team are responsible for investigating known or suspected incidences of slavery and human trafficking.

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Signed by the Company Secretary on behalf of The Spicers-OfficeTeam Group Limited



Anti-Slavery and Human Trafficking Policy Statement

Modern slavery is a crime and a gross 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 control 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, consistent with our obligations in the Modern Slavery Act 2015. We expect the same high standards from all our suppliers, contractors and other business partners. We include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and expect our suppliers will hold their suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including all employees, directors, officers, agency workers, contractors and consultants.

Responsibility

The Board have overall responsibility for ensuring the policy complies with our legal obligations and that it is complied with. The Company Secretary is responsible for implementing the policy and monitoring its use.

Compliance

Everyone issued with the policy must they have read and understood the policy.

It is everyone's responsibility to ensure the prevention, detection and reporting of modern slavery either in the business or supply chain. You are responsible for ensuring that you avoid any activity that may breach or lead to a breach of this policy.

If you have any concerns, please notify your manager, HR or the Company Secretary as soon as possible. In accordance with the Whistleblowing policy, we will ensure that everyone feels comfortable in raising concerns without a risk of any detrimental treatment. Please refer to the Whistleblowing policy for more information.

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Signed by the Company Secretary on behalf of The Spicers-OfficeTeam Group Limited