



ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT 2024-25

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. Whatever form it takes, the common theme is 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 (the group’s ultimate 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)
- VOW Retail Limited (trading as VOW Retail)
- Banner Business Solutions Limited (which, since 09 January 2023, following its acquisition of certain of the business and assets of CB Realisations Limited (in administration) (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**”)
- Premier Vanguard Limited (trading as premvan)



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

This statement includes the steps each of our trading companies have 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 its own separate statement.

The registered office address of the group's ultimate 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 direct channels, which supply goods and services directly to end users, and indirect channels, which supply goods and services to resellers and eCommerce / online operations.

We have a number of distribution centres, hubs and offices across the UK and Ireland, with a total of 2,036 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 46% of the products we source being manufactured in Europe.

Generally, we consider that our business and our supply chains are low risk in terms of modern slavery and human trafficking.



Some suppliers from some areas within Asia are considered of higher risk and we pay particular attention to suppliers 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.

As part of our commitment, we have in place an Anti-Slavery Policy and a Corporate Social Responsibility (CSR) Policy, each of which sit alongside various other policies (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 so as to ensure, as far as possible, that 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, and our Policies generally, 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 in respect of their own suppliers and subcontractors, so as to ensure (as far as we can), there is no slavery or human trafficking happening in their supply chains – which are, of course, an extension of our 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, or which are otherwise inconsistent with our Policies.

In order to continue to identify and mitigate risk, and building on our communications 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 doing this with all 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). 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 with) our updated supplier onboarding processes. All new suppliers are required to provide information about their supply chains and to confirm compliance with our Policies.

In quarter 3 of 2023 we created a new risk assessment process for modern slavery and human trafficking under which all products and suppliers will be risk assessed every six months. The risk is determined according to our targeted risk mapping process, the extent of which is determined by the nature of our relationship with the supplier, the country of manufacture of the product(s) they supply, and the type(s) of product(s) concerned.

We also updated our Anti-Slavery Policy to reflect the changes we made to our risk assessment process, and to highlight key performance indicators on which we report annually to the EVO board.

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 other appropriate (freely negotiated) terms, as required by and agreed with 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 and our Policies generally. 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 the world has largely fully returned 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 general increase in operating costs that has brought to practically all business, together with the added pressure caused by the continuing situations in the Ukraine, the Red Sea and the Middle East regions, we feel this is a notable achievement in the current economic and operational climate.

4. TRAINING

To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our business and in our supply chains, we have provided training to our staff, which will be repeated in the forthcoming year. Staff joining since our last statement will also have received (or will receive) appropriate training.

Since our last statement, in 2023 we provided specific training to all of our staff involved with the procurement of goods for resale on the updated Anti-Slavery Policy and associated issues and procedures.

In early 2024, we added further information on our groupwide intranet to raise awareness of Modern Slavery and Human Trafficking issues within the UK and Ireland.



We intend to add to and update this periodically, as our trading environment expands and adapts to the changes we are seeing in trading patterns.

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. These matters remain an ongoing workstream as we always strive to improve year on year.

- **General steps for all EVO group companies**

- Further Modern Slavery Act training for relevant staff who are engaged in the procurement of products and services.
- We plan to conclude our review and update of our supplier Code of Conduct to ensure greater transparency from our suppliers, and to ensure that established best practice is implemented across the whole group.
- 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 (CSR) Charter in 2022, featuring a theme relating to 'enhanced supplier compliance' to further support our Modern Slavery and Human Trafficking due diligence, we intend to look at additional ways to enhance our processes.

- **Our Specific Programme for Complete**

This has proven to be a bigger undertaking than we had first envisaged.



This is for no other reason than the number of suppliers Complete deals with in order to bring its diverse commercial offering to market, and the niche area of the industry in which it operates. As such, whilst we have made very good progress towards our goal of fully aligning the Complete business with that of the rest of the group, we still have a material amount of work to do.

Building on what we set out to do last year (as set out in our previous statement), we now outline what we have done and what we intend to do in respect of the Complete business – and we plan to conclude this activity well within the next twelve months.


- Our planned detailed audit of all Complete suppliers and their policies and procedures for preventing and combating modern slavery and human trafficking (in any form) in their supply chains has progressed well. However, we still have work to do. This is principally due to the number of suppliers (around 700) and the number of products sourced (around 600,000) and, whilst we have work to do in this area, we envisage having the audit finished within the next quarter, and that all measures will be in place by the end of the year.
- As we progress our audit to conclusion, we have been implementing group Policies and procedures within the Complete business as we go, so as to align Complete with the rest of the group. We envisage this work will be concluded within the next quarter.
- Since our last statement, each member of the Buying Team within Complete has undergone and successfully completed appropriate Modern Slavery and Human Trafficking training. Over the next twelve months, we will be rolling this training out to all Complete staff as well.
- It is worth noting that Complete only deals with UK based suppliers so, from a risk perspective, we are satisfied that Complete’s activity/ies in this area are relatively low risk – but low risk does not mean no risk, and will not let our guard down.
- It should also be noted that Complete purchases goods from other EVO companies, namely VOW Wholesale and premvan. In the course of these dealings, appropriate controls are in place to ensure that such intra-group trading is conducted properly – i.e. on an arm’s length basis and with suitable information barriers in place but, at the same time, maintaining appropriate and measured Anti-Slavery and Human Trafficking due diligence and practices.



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 2023.

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 2025).

Signature: 

Name: Andrew Gale

Office Held: Chief Executive Officer of the EVO group of companies
(For and on behalf of EVO Business Supplies Limited, Banner Group Limited, VOW Europe Limited, VOW Retail Limited, Banner Business Solutions Limited and Premier Vanguard Limited)

Date signed: 26 June 2024