

## **2023 Modern Slavery Statement**

This statement is designed to satisfy the requirements of Section 54 of the Modern Slavery Act 2015 (the “Act”), by setting out the approach of Fairtrade Vending Ltd to modern slavery, human trafficking, forced labour and labour rights violations in its supply chains for the financial year ending 31<sup>st</sup> December 2023.

We continue to take our responsibility to prevent modern slavery and trafficking within our supply chain seriously. Fairtrade Vending recognises that 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 recognise that we all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

We are proud of the conditions of employment for all our employees throughout the business. The employment of colleagues and purchasing practices operated by us ensure that the company operates ethically, and we expect a high level of ethical conduct and transparency from those businesses with which we purchase or conduct other business with or within our supply chain. Fairtrade Vending has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no place for modern slavery or human trafficking in our supply chains or in any part of our business. We do not knowingly trade with or support any business involved in these practices.

### **Our status, operations, and supply chain**

Fairtrade Vending is registered limited company under registration number 08346285 (England and Wales) Fairtrade Vending has a turnover below £36million.

Fairtrade Vending has a diverse and small supply chain, with procurement carried from within our supply chain where some goods from our suppliers are sourced, purchased, and imported into the UK from around the globe.

### **Current Procurement policy and processes**

Fairtrade Vending follows UK public sector procurement legislation and ensures that all potential and incumbent suppliers are dealt with professionally, fairly, and ethically and that we always uphold the principles of sustainable procurement. Our procedures also comply with UK law and address environmental management, health and safety and equality legislation.

Suppliers are evaluated on criteria including their approach to risk; environmental sustainability; health and safety; modern slavery and safeguarding.

We require our suppliers to maintain their standards while supplying us. We have a variety of channels both internally and externally facing which facilitate the raising of concerns over supplier behaviour.

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## **Identifying and Managing Risk**

With over thirty suppliers, delivering a wide range of goods and services, we use a structured approach to ensure that the high-risk categories and countries are identified, and that relevant and proportionate due diligence is carried out to ensure that risk can be identified and appropriately managed.

Fairtrade Vending has used publicly available international data on modern slavery and analysed spend to identify our highest risk categories of spend as defined below in Sexual exploitation, forced labour, child slavery, forced criminality, domestic servitude, forced marriage, organ harvesting and human trafficking. It can affect men, women, and children, from abroad or from the UK in the following areas-

Catering Supplies & Services.

Furniture, Furnishings & textiles.

Janitorial & Domestic Supplies & Services.

Travel & Transport.

Estates & Buildings.

Temporary labour providers.

## **Due diligence and monitoring**

Our due diligence and monitoring processes and procedures aim to reduce the risk of slavery and human trafficking through:

Ensuring appropriate checks are done on organisations we work and do business with that is proportionate to their size and risk environment.

Regularly monitoring potential risks of slavery and human trafficking in our business and supply chains and appropriately responding to those risks.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have reviewed our procurement and due diligence policies and procedures, conducted a review of our major existing suppliers to understand their commitment to preventing slavery and human trafficking, and ensure all grant and service agreement terms and conditions include a commitment to complying with the Modern Slavery Act 2015.

Additionally, we will conduct appropriate and proportionate due diligence checks related to slavery and human trafficking on all new major suppliers and grantees and will ensure they agree to terms and conditions that require them to comply with the Modern Slavery Act 2015 and, where applicable, review their own Modern Slavery Statement.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with the terms and conditions of our agreements by any of our suppliers, we will require that supplier to remedy the non-compliance.

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## **Managing Risk and Adherence to The Act**

Our standard supplier contract agreements include modern slavery and human trafficking undertakings. We expect our supply chain to respect and comply with all applicable laws, including The Act, and under our standard contracts Fairtrade Vending reserves the right to terminate its arrangements with a supplier which is found to be in breach of The Act.

## **Social responsibility and human rights**

Fairtrade Vending is committed to respect for human rights and to acting in a socially responsible manner in our operations and programming. All our work seeks to support and respect the protection of internationally proclaimed human rights and to ensure that our staff, offices, and supply chains are not complicit in human rights abuses.

## **Training**

Our modern slavery training covers:

Our organisation's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.
- We recognise the importance of ensuring all our staff understand how modern slavery manifests itself and how to report when it does.

## **Policies**

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The company's staff have access to the following policies, which are reviewed on an annual cyclical programme.

Recruitment Policy

Code of Conduct

Whistleblowing Policy

Anti-corruption Policy

Financial Procedures (including procurement procedures)

Safeguarding Policy

Environmental Policy

Through these policies and the measures below we aim to prevent modern slavery occurring at the company or in our supply chains:

All staff have undertaken mandatory training in safeguarding which covers modern slavery.

Staff are aware of how to report incidents of concern and are encouraged to do so. They can do this through their managers or through our whistleblowing procedure.

Safeguarding incidents are reported to the companies safeguarding panel.

An appropriate procurement process is in place to satisfy ourselves all suppliers meet our policies and procedures.

Pre-employment checking to minimise the risk of modern slavery within our recruitment process.

## **Next steps and Key Performance Indicators (KPI's)**

In the next financial year and on an ongoing basis, we intend to take the following steps to tackle slavery and human trafficking by:

Ensuring staff are aware of the commitments to combatting slavery and human trafficking through our codes of conduct, whistleblowing, complaints, and procurement policies.

Conducting due diligence on new suppliers that include checks on their compliance with Modern Slavery Act 2015 that are proportionate to their size and risk environment.

Ensuring all new suppliers agree to our terms and conditions related to Modern Slavery Act 2015.

Annually reviewing our supply chain to monitor and assess our own risk environment as it relates to slavery and human trafficking.

## **Organisational Declaration**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. The statement has been approved by the Board of Directors 24 January 2024 and signed on its behalf by the Managing Director – Robert Steel.