

## **MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT** **FOR THE FINANCIAL YEAR ENDING 24 JANUARY 2026**

### **Introduction**

This statement sets out the actions and activities that Central England Cooperative and Midcounties Cooperative have taken during the financial year ended 24 January 2026 and continue to take as the combined OurCoop ('the Society'), to ensure that modern slavery or human trafficking is not taking place within the Society or its supply chain.

Modern slavery is a crime resulting in the abuse of the human rights of vulnerable workers. It can take the form of slavery, servitude, forced or compulsory labour or human trafficking. The Society has a zero-tolerance approach to modern slavery. We are committed to acting ethically, with integrity, and with transparency in all our business activities and relationships to safeguard against any form of modern slavery taking place within the Society. We expect the same high standards from our suppliers and contractors.

### **Our Business**

Where forwards looking, this statement covers the activities of OurCoop and its subsidiaries, a business operating solely within the UK. Where this statement makes reference to events or activities prior to 24 January 2026, those statements will be reflective of both the former Midcounties Cooperative and Central England Cooperative societies unless an explicit statement is made to the contrary.

### **Our Focus Areas**

We assess whether a particular activity is at risk of modern slavery or human trafficking by undertaking periodic assessments of new and existing suppliers. In addition, we perform a number of checks as part of the recruitment process designed to identify persons at risk of modern slavery as well as periodic checks over existing employees.

During the period ended 24 January 2026, our assessments have not identified any activities to be at high risk of slavery or human trafficking within the Society's GNFR (goods not for resale) supply chain.

Approximately 95% of the products sold in OurCoop food stores are supplied by the Co-operative Group Limited under the terms of a buying services agreement managed by Federal Retail and Trading Services Limited (FRTS) where assurances around Modern Slavery compliance are provided separately. A similar percentage of the products sold in Midcounties and Central England Cooperative food stores were likewise supplied by the Co-operative Group Limited and managed by FRTS.

Checks performed over existing and prospective colleagues' have likewise not identified any persons at risk of modern slavery.

## **Our Policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Modern Slavery and Human Trafficking Policy** – this Policy sets out the Society's stance on modern slavery and explains how our colleagues can identify and report instances of modern slavery and human trafficking within our business activities or supply chain.
- **Whistle-blowing Policy** – this policy is designed to make it easy for our colleagues to make disclosures without fear of reprisal. Colleagues can use the Society's confidential telephone line to make such disclosures. Any disclosures in relation to modern slavery or human trafficking will be reported to the Police to investigate.
- **Colleague Code of Conduct** – we make it clear to our colleagues of the actions and behaviours that are expected of them when representing the Society.
- **Recruitment and Selection Policy** – we operate a robust recruitment policy, which includes the checking of eligibility to work in the UK (Right to Work) to help safeguard against human trafficking or forced labour. We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from that agency.

- **Procurement Policy** - The Society commits to undertaking due diligence in its supply chain to ensure that suppliers have a zero tolerance to trafficked, bonded, child or compulsory labour or servitude.

## **Our Supply Chain**

We strive to maintain the highest standards of colleague conduct and ethical behaviour when managing our supply chain.

Our suppliers are expected to comply with the Society's standards in relation to modern slavery. This includes their commitment to comply with all legislation in relation to the Modern Slavery Act, to commit to not taking part in any action that might cause or lead the Society to be in violation of the Act, to assist the Society in the performance of activity by any regulatory body for the purposes of the Act.

Our Procurement Policy underscores the Society's commitment to ensuring due diligence is undertaken during the procurement of new suppliers to ensure that prospective suppliers have a zero tolerance to trafficked, bonded, child or compulsory labour or servitude.

The Society also operates various supply chain due diligence controls to ensure compliance with the Modern Slavery Act 2015, including:

- Invitation to Tender - A statement added to the Procurement Invitation to Tender document (for new suppliers) ensuring suppliers who complete and respond, comply to the Society's Modern Slavery and Anti Bribery Policies.
- When Suppliers are on-boarded, they are required to sign up to a Supplier Code of Conduct. Our external website includes a guide for potential suppliers which references the Code of Conduct.
- Our standard contract terms and conditions include reference to supplier obligations to comply with the Modern Slavery Act 2015.

## **Training**

The Society provides awareness training via online (via our iLearn and Let's Learn portals) modules around Modern Slavery to key colleagues including our Executive and Senior Leadership teams.

### **Our Performance Indicators**

During the year ended 24 January 2026, no issues were highlighted through the confidential hotlines in line with either Society's Whistle-blowing Policies, nor were any reports received from Midcounties of Central England Cooperative colleagues, the general public or law enforcement agencies, to indicate that modern slavery practices have been identified. Any whistle blowing reports in this area would have been reported to the respective Societies Audit and Risk Committees as part of the quarterly compliance updates providing oversight of the process. Since the year end, the OurCoop Audit and Risk Committee has continued to receive similar reporting.

### **Business Assurance and Risk Management**

During January 2025, an Internal Audit of the design and effectiveness of modern slavery controls in Central England Cooperative was undertaken. This was the first such Internal Audit of the modern slavery statement – all actions from this review were implemented during the year. As part of the 2026 OurCoop internal audit plan, a review of modern slavery controls is scheduled for completion in Q2 and going forward, the Society will assess the need for further reviews as part of the audit planning process.

The Society will continue to monitor key risks and controls in respect Modern Slavery during 2026/27 as part of its periodic risk register updates and take appropriate action if we suspect or are advised of any instances of modern slavery or human trafficking within the Society or our supply chain.

### **Supporting the survivors of Modern Slavery**

In 2020 the Midcounties Co-operative Society co-founded the Bright Future (Co-operative) Limited (“Bright Future”). The core purpose of Bright Future is supporting survivors of Modern Slavery and human trafficking through providing a pathway to recovery and resilience through stable employment. Bright Future’s key areas of focus are:

- Financial independence
- Dignity and purpose
- Reducing the risk of re-exploitation

Bright Future accepts referrals from frontline support organisations such as housing and victim support charities and helps victims by matching them with suitable employers, paid work placements and with the transition into permanent employment. Once in employment Bright Future provides regular check-ins and wellbeing support to reduce the risk of victims dropping out of employment and becoming vulnerable to re-exploitation. To date more than 100 survivors have been helped into stable employment through the involvement of Bright Future and OurCoop continues to support their activities.

**Approved by the Board of Directors**

April 2026