

# **MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT** **FOR THE FINANCIAL YEAR 2024/25**

## **Introduction**

This statement sets out the actions and activities that Central Coop ('the Society') has taken during the financial year ended 31 January 2025 and is continuing to take, 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**

This statement covers the activities of Central Coop and its subsidiaries, a business operating solely within the UK.

## **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.

During the period ended 31 January 2025, 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 Central Coop 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.

## **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 an online (via our Let's Learn portal) module around Modern Slavery to key colleagues including our Executive and Senior Leadership teams.

## **Our Performance Indicators**

During the year ended 31 January 2025, no issues were highlighted through the confidential hotline in line with the Society's Whistle-blowing Policy, nor were any reports received from our colleagues, the general public or law enforcement agencies, to indicate that modern slavery practices have been identified.

## **Business Assurance and Risk Management**

During January 2025, an Internal Audit of the design and effectiveness of modern slavery controls was undertaken. This was the first such Internal Audit which will be carried out on an annual basis ahead of publishing the modern slavery statement.

The Society will continue to monitor key risks and controls in respect Modern Slavery during 2025/26 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.

## **Approved by the Board of Directors**

April 2025