

12/02/2021

Bates Office has comprehensive processes in place to manage all risks in our supply chain and service solutions to ensure business continuity. These are several known risks in which we can proactively manage, including the manufacturing industry, sourcing of products and the global supply chain. Bates Office mitigate these risks through frequent slavery and human trafficking reporting as part of our Corporate Social Responsibility (CSR) scheme. As a responsible supplier, we ensure that our extended supply chain is free from conflict, modern slavery and human trafficking through extensive reporting and annual audits.

Modern slavery is prevalent across the globe with an estimated 21 million people in forced labour¹. In line with the Modern Slavery Act, we take provisions to ensure that our supply chain is transparent and are committed to tackling slavery. Through proactive communication within our own organisation and our supply chain, our colleagues, stakeholders, and suppliers can confidently identify the signs of modern slavery and have the autonomy to flag potential incidents.

As a company, Bates Office avoid making demands of our suppliers and subcontractors that may lead to human rights violations, including unrealistic lead times, late payment and high-pressure bulk ordering. We operate a zero tolerance for modern slavery and human rights violations. We ensure that references to modern slavery are built into contracts with our suppliers and subcontractors. Bates has adopted risk assessment policies and procedures, researching, and identifying the relevant risks to the industries we operate in.

Bates Office effectively monitors our supply chain as an important deliverable action on mitigating the risk of modern slavery. Effective monitoring includes unannounced site visits, worker interviews and detailed supplier / manufacturer auditing and reporting. We understand that organisations can be implicated in modern slavery directly and indirectly, through operations, global supply chains, and use of agency and/or temporary workers. Businesses can increase the risk of modern slavery through tight timeframes and an exponential increase in demand. For contracts where there are large quantities required in a relatively small timeframe, we complete risk assessments on all manufacturers we are proposing to use. This includes financial factors and the rise of forced labour. Should any of our manufacturers have failed this assessment, we would use their product and/or services.

Bates Office has preparations in place for the possibility of modern slavery being identified. We will follow recommendations to consult guidance from the GLAA rather than attempting to address this issue internally. We understand that it is necessary to respond quickly and appropriately, and with direction and strong leadership. The process of rectifying modern slavery is to firstly report the allegation, target non-compliant companies, and committing to help the individuals who have been exploited. BOS will adhere to best practice and, therefore, will help initiative and oversee reform after discovering exploitation. This can include follow-up visits, site meetings, and auditing. We will work transparently with organisations who help victims such as Hope for Justice.

We will help our supply chain to set out corrective-action plans to root out the problem and help raise standard with suppliers. In the interim we will not use product associated with the organisation, however, should the rectification process be successful, and the company has proven to have made successful changes we will reintroduce the product. Should attempts to encourage change be ignored, we will terminate the sourcing relationship. At present, we have not had any allegations of slavery or human trafficking in our supply chain or that of our manufacturers.

Please find Bates Office's Modern Slavery Policy below

¹ International Labour Organization, *'Transparency in Supply Chains etc. A Practical Guide'*, assets.publishing.service.gov.uk, accessed 10/12/2020

Modern Slavery Policy

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. Bates Office Services has a zero-tolerance approach to any form of modern slavery within our supply chain. We are committed to acting ethically, with integrity and transparency in all aspects of our business. As a company, with the Board of Directors leadership and approval, we are complying to the UK and European legislation and regulatory requirements.

Bates Office's guidance on Modern Slavery is to:

- Comply with UK and European legislation and regulatory requirements
- Make Modern Slavery factors a consideration when making procurement decisions
- Ensure appropriate awareness throughout the organisation of modern-day slavery issues
- Ensure that suppliers and service providers are aware Bates Office actively promote the requirements of legislation

Bates Office aim to;

- Include Modern Slavery conditions/criteria in specification or tender documents wherever applicable
- Evaluate specifications and tenders with appropriate weight given to Modern Slavery points
- Encourage all suppliers and contractors to take their own action and understand their obligations to these requirements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the year, from the date of this document.

Structure

Bates Office Services LTD (03352929) provides public and private sector organisations with office productivity supplies. Including, but not limited to; Office Stationery, Office Furniture, PPE & Workwear, Document Management, Confidential Waste, Managed Print Solutions, Design & Print, Digital Solutions and Total Building Solutions.

Bates Office is a private limited company with three shareholders and a Board of Directors. Bates Office operates out of three distribution hubs and a sales office across the UK. The sourcing of goods is overseen by Bates Office's Commercial Director who guarantees that our internal procedures are updated to ensure adequate procurement pricing, prompt payment and good planning.

Due to the nature of Bates Office's services, supplier relationships and contracts are long-term and fixed. Bates Office works collaboratively with our suppliers to comprehend the structure of our supply chain beyond Tier 1. Bates Office has adopted a policy that requires our suppliers and their supply chain to be transparent in reporting and hold the same ethos.

Dependent on business category, Bates Office sources direct from manufacturers, wholesalers and dealers.

Policies

Bates Office has a clear code of conduct for employees and suppliers. Bates Office's code of conduct includes comprehensive details on the following: Recruitment, Procurement, Whistle Blowing, Migrant and Child Labour. Further, Bates Office has developed policies on Gender and Compensation for Labour Rights Abuses.

Upon employment, staff are trained on Bates Office's code of conduct and Modern Slavery policies. All employees are required to sign and acknowledge comprehension, training, and awareness of Bates

Office's code of conduct. Staff training is updated regularly, and awareness is constantly embedded within Bates Office's work culture.

Bates Office proactively enforces and encourages good practice within the office environment, including dedicated and trained staffed members responsible for monitoring policies and their effectiveness. Bates Office operates on transparency and openness and as such, encourage employees to report supply chain issues and/or queries.

Bates Office provides comprehensive training on Modern Slavery and awareness around the subject. Employees are provided with specific training by a third-party company that is updated annually and should there be developments. Employees are trained on how to raise complaints within the company. Bates Office's relevant decision-makers, including all shareholders and directors, are trained on risks, policies and standards related to Modern Slavery, human trafficking and forced labour.

Due diligence

Bates Office appropriately assesses the risk linked to Modern Slavery in the supply chain. Bates Office assess risk in terms of lack of regulation in source countries, lack of transparency in the various tiers of the supply chain, high-risk sectors and employment arrangements and absence of workers rights.

Processes include ensuring anti-slavery clauses in contracts with suppliers, manufacturers and wholesalers and other transparency provisions. Further, Bates Office ensures that suppliers have annual statements that demonstrate progress, monitoring, actions planned and taken.

Effective action

Bates Office will publicly disclose any identified instances of Modern Slavery alongside corrective solutions and targets. Bates Office communicates transparently with supply chains and will disclose all identified instances of Modern Slavery.

Bates Office has processes in place to remedy and compensate for abuses of the Modern Slavery Act and regulations. Key Performance Indicators have been established and are frequently updated to ensure efficiency and compliance.

KPI's include, but are not limited to; ensuring that 100% of employees are exposed to Modern Slavery awareness through internal, director-led campaigns. Ensure that 100% of directors and purchasing staff receive ongoing updates regarding business, human rights, and Modern Slavery. Report upon the number of reported instances of Modern Slavery within the business and supply chain. Ensure new 100% of new suppliers are transparently reporting upon their own supply chain.



Michael Edmonds

Managing Director

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