



Lincolnshire Co-operative Ltd

Statement under the Modern Slavery Act 2015

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Society has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Society has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Lincolnshire Co-operative is based in Lincoln and has over 280,000 members and 215 outlets offering a wide range of diverse activities including food stores, travel, pharmacies, funeral homes, post offices and a florist. Our trading area is predominantly Lincolnshire but we also have sites in Yorkshire, Norfolk and Nottinghamshire.

Our high-risk areas

We continue to review the processes of our core suppliers and have not identified any activities which are at high risk of slavery or human trafficking.

98.5% of our food turnover is supplied, sourced and approved via the Co-operative Group.

A copy of their Modern Slavery statement can be found at <https://www.co-operative.coop/ethics/modern-slavery>

Our policies and procedures

We have a number of internal policies in place to ensure that we are conducting business in an ethical and transparent manner.

1. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Our whistleblowing policy is designed to ensure that all employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal.
3. We have created a section on our Society intranet to raise the awareness and profile of Modern Slavery with our employees, and provide our colleagues with a means of 'soft' reporting through the Society of any concerns they may have around suspected instances of Modern Slavery.

We are committed to continually reviewing and updating our policies, procedures and processes to identify and mitigate any risk to our business.

Since our last statement

We have built on the processes we already had in place, and have progressed these by:

- Engaging with Lincolnshire Police's Modern Slavery Team, establishing a robust line of communication with them. The training package we produced for our suppliers has been demonstrated to Lincolnshire Police, who have endorsed its content, giving it their accreditation.
- Connecting with the Lincolnshire Modern Slavery Partnership, which takes a multi agency approach to tackling Modern Slavery within our trading area.
- Developing and instigating our Modern Slavery Training plans, both internally and externally.



Our suppliers

We are conducting local supplier audits and maintaining a preferred supplier list. We conduct due diligence on contractors before allowing them to become a preferred supplier. This due diligence includes a site visit and audit.

In addition, and as part of our ongoing review of our supplier contracts, we will be asking that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

Our colleagues are working through our internal Modern Slavery training pack, with 61% of our non-food colleagues now having completed this training. The Food areas of our business are scheduled to also participate and complete this training by December 2018.

The Suppliers' Modern Slavery training pack has been trialled with two of our local suppliers, both of whom have now completed the course and rated it as 'Excellent' or 'Very Good'.

It is also intended that this training is completed by our direct suppliers, contractors and service providers who fall outside of those sourced and approved by the Co-operative Group.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

We will also be able to measure progress by:

- The number of our colleagues who have completed our internal Modern Slavery training pack; and
- Supplier awareness raised through the completion of their Modern Slavery training, allowing us to produce statistical data on numbers completed, measures taken to mitigate risk and increased knowledge of Modern Slavery.

Approval for this statement

This statement was approved by the Board of Directors on 22nd October 2018.

A handwritten signature in black ink, appearing to read "S. Hughes".

Stephen Hughes, President