



Lincolnshire Co-operative Ltd Statement under the Modern Slavery Act 2015

We have reported on our ethical approach to procurement for a number of years. Last year for the first time we were required by law to publish a statement outlining the steps taken during the financial year to ensure that slavery and human trafficking are not taking place in our business or supply chain. During the year we've reviewed our processes generally and are pleased to include this updated statement.

This statement is made in accordance with section 54 of the Modern Slavery Act 2015.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Lincolnshire Co-operative Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in our 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

Our diverse trading activities entail trading or other relationships with approximately 5,200 organisations.

Our high-risk areas

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

It is important to note that 83% of the Society's food turnover is from goods sourced and approved through a central buying agreement with the Co-operative Group Plc. A copy of their Modern Slavery Statement can be found at www.cooperative.coop/ethics/modern-slavery

Our policies and procedures

We operate internal policies to ensure that we are conducting business in an ethical and transparent manner. An Anti-Slavery policy is being developed and will set out our stance on modern slavery.

We operate robust recruitment procedures which include conducting eligibility to work in the UK checks for all employees. We have a whistleblowing policy so that all employees know they can raise concerns about how colleagues are treated, or practices within our business or supply chain, without fear of reprisals.

We are also committed to reviewing and updating our policies and procedures during the forthcoming financial year to further identify and mitigate risk, to expand upon our training and to develop appropriate performance and monitoring procedures.

Our suppliers

We have begun reviewing and reinforcing our approved supplier list and are identifying ways we can ensure there is no modern slavery in our supply chain.

In addition, as part of our contract with suppliers, we will be requiring 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. They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We are in the process of developing a training programme for our procurement/buying teams so they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

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.

Approval for this statement

This statement was approved by the Board of Directors on 23rd October 2017.

A handwritten signature in black ink, appearing to read "Julia Romney".

Julia Romney, President