

Modern Slavery Statement 2025

1. Our Purpose

Lincolnshire Co-operative has always been proud of its ethical and responsible approach to business, and serving local communities. We take a proactive approach to managing and mitigating the risks arising from modern slavery.

Our Modern Slavery Statement for 2025 is made pursuant to section 54 of the *Modern Slavery Act 2015* ("**MSA 2015**") and sets out the steps we have taken to ensure that modern slavery is not taking place within our business or supply chain. This Statement shows how we have continued to develop our approach in this area over the past year.

2. Our Business

We are an independent co-operative business based in Lincoln with around 300,000 members. The Society has over 220 trading outlets, with its principal trading activity being conducted through its food stores, funeral services, travel agencies, post offices, pharmacies and commercial lettings. We trade predominantly throughout Lincolnshire, with sites in Nottinghamshire, Yorkshire and Cambridgeshire.

3. Our Suppliers

At Lincolnshire Co-operative, approximately 90% of products sold within our food business are supplied by the Co-operative Group, under the terms of a buying service agreement, managed by Federal Retail & Trading Services Ltd ("**FRTS**") which purchases on behalf of our food business.

FRTS has its own *Modern Slavery Statement* and *Sound Sourcing Code of Conduct* which can be viewed at www.co-operative.coop/ethics. FRTS is a member of the Ethical Trading Initiative, whose vision is a world where all workers are free from discrimination and exploitation. As a result, we are confident that the Co-operative Group has taken, and continues to take, reasonable measures to minimise the risk of modern slavery within its operations and supply chain.

As a business, we seek to support our local suppliers by selling their products in our stores and, as we source their products directly, we work with them to ensure that their operations are free from any aspects of modern slavery. We carry out due-diligence checks in relation to modern slavery for each potential new supplier or contractor prior to engaging with them as a business to ensure compliance with the Society's standards around modern slavery.

All prospective local suppliers to our food business have an audit carried out by our Buying Team which covers modern slavery to ensure compliance with relevant standards. Once accepted, suppliers are asked to complete our bespoke i-Learn module on modern slavery to increase their knowledge and awareness in this area.

We maintain an approved contractor list for construction works and services and only companies held on this list are used. We ask these companies to also complete our bespoke i-Learn module on modern slavery to ensure our standards as a business are maintained and to raise awareness within the contractor's own operations. It is also a requirement of our *Standard Purchasing Contract* that they confirm compliance with the MSA 2015.

4. Our Policies and Procedures

At Lincolnshire Co-operative, we maintain policies and procedures to mitigate the risk of any person being exploited within our business. These include:

- A robust *Recruitment Policy*, including eligibility to work in the UK checks for all potential colleagues, to safeguard against Human Trafficking or persons being forced to work against their will.
- A *Whistleblowing Policy*, to allow concerns to be raised in complete anonymity by anyone without fear of reprisal.

- A *Modern Slavery Policy* and *Human Rights Policy*, to help underpin this Statement.
- A *Lettings Policy*, which sets out the checks and due diligence we undertake on prospective tenants to ensure there is no risk of modern slavery taking place within our commercial property portfolio.

As well as having in place internal and external whistleblowing reporting channels, our colleagues can also report any suspicions or concerns that they may have internally to our Health, Safety, and Security team via the Society's intranet, enabling further investigation where appropriate.

5. Training and Awareness

Our colleagues undertake modern slavery training at least every other year. Colleagues with specific responsibilities in relation to modern slavery prevention also undertake additional enhanced training sourced from external providers, as appropriate. Previously, we extended the provision of modern slavery training to all of the Society's commercial tenants and suppliers, which is accessed through the Society's on-line training portal. We are this year refreshing the awareness programme and providing free training for suppliers and tenants. Our suppliers will also receive more frequent updates on risks developing around modern slavery. A quarterly newsletter is provided for our suppliers and contractors to provide more consistent awareness on emerging trends around modern slavery.

We have maintained our relationship with Lincolnshire Police, regularly engaging with their Modern Slavery Officers to keep updated on instances of modern slavery in our area. This year, we again promoted awareness of the County Lines aspect of Modern Slavery. This was jointly supported by the Children's Society as part of their **#Lookcloser** campaign. County Lines operations criminally exploit children, forcing them through threats, intimidation, and usually debt bondage, to courier drugs or cash to areas such as market or coastal towns. The gangs organising this activity target children, for this purpose, as they are less likely to attract any suspicion from enforcement authorities.

We subsequently met with both the Police and the Children's Society and supported this campaign through a series of in-store radio announcements in our Food premises, with several messages broadcast each day in each premises for a week, helping to increase customer awareness of the subject.

We have updated our anti-money laundering training to provide awareness to colleagues surrounding suspicious cash transactions, whether they be banking deposits or purchases of gift cards which can be used as methods of 'placement' and 'layering'. This will assist us in preventing the flow of finances for traffickers.

We are aware of the updated guidance under section 54 of MSA 2015 which significantly increases expectations on the level of detail to be included in modern slavery statements from 2026 and places a heightened focus on action and impact in practice.

6. Monitoring and Effectiveness

We know the steps we are taking in relation to modern slavery are effective by monitoring:

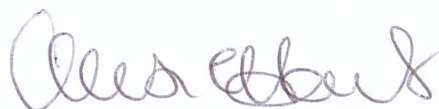
- The number of incidents or reports received from our colleagues, the public, or law enforcement agencies.
- The number of our colleagues, suppliers, and tenants who have completed our modern slavery i-learn module.
- The maintenance of regular contact with law enforcement agencies by those colleagues with specific responsibilities for the prevention of modern slavery.
- Cash transactions that could potentially be linked to money laundering or people trafficking finances, subsequently reporting these to the National Crime Agency where necessary.

7. Approval of this Statement

This Statement was approved by the Board of Directors on 17 November 2025:

A handwritten signature in black ink, appearing to read "David Cowell".

David Cowell
Chair of the Board of Directors

A handwritten signature in black ink, appearing to read "Alison Hands".

Alison Hands
Chief Executive Officer

