

POLICIES



SLAVERY STATEMENT 2017/18

This statement sets out how we at Commercial believe in the abolition of modern slavery as set in the Modern Slavery Act 2015.

INTRODUCTION

Modern slavery is a crime that violates human rights. The Modern Slavery Act 2015 gives us a clear and defined understanding of what this term means and to whom it applies. It encompasses the practices of human trafficking, forced servitude, exploitative, coercive and abusive behaviour, as well as sets out for us how squalid and degrading working environments coupled with appalling living conditions, can constitute a breach of peoples basic liberties. All of this is underpinned by an employer or criminal gang knowingly and wantonly exploiting the individuals to better themselves financially or commercially. No sector nationally or internationally can consider itself immune from these insidious business practices, and we at Commercial have a zero tolerance policy, as well as an active and collaborative approach with our suppliers and partners to cleanse any aspect of our business from the potential threat and the tragic negative human impact of such activity. Modern slavery is considered by some a geographical issue existing beyond our borders, this is not true. The United Kingdom sits a very startling 3rd on the list of countries with serious human rights abuses. Gang masters and human trafficking are well documented within our shores, making it all too possible that modern slavery could exist somewhere within or behind a supply chain tier. We at Commercial are committed to acting ethically and with integrity at all times, and in writing this statement set out our commitment to ensuring it does not exist within our business directly or indirectly.

OUR BUSINESS

Commercial is one of the UK's largest independent business services group, and as such have the capacity to re-sell tens of thousands of different product lines, including some of our own branded products. Our business consists of 5 Divisions: Interiors, Office Supplies, Print, IT Services, and the recently added Wiles Greenworld in London. This gives our organisation access to an endless array of product lines that are both complex from a supply chain point of view, but also from the nature of the supplier network, and the manufacturing base beyond on a national and an international level.

POLICIES



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We have spent 27 years building our business and our reputation and as such are not just concerned with how we do business, or how we can help our customers, but critically we

want to make sure our suppliers are also doing the right thing. After much discussion with the Ethical Trade Initiative in 2011 we understood the importance for investigation and education in the areas employment, supply chain transparency, living wage adherence and crucially it gave us visibility to the growing epidemic of Modern Slavery. The ETI represents a membership organisation of likeminded businesses who believe that behaving ethically, morally and with integrity is at the core of who they are, we encapsulate our vision of this with our mantra, Commercial by nature. Our trading and training initiatives and all our ethical, environmental, and supplier compliance is overseen by our CSR team as well as our board of directors.

We document all of our initiatives, the ETI Base Code with which we are compliant, as well as all of our policies and procedures in our employee handbook, which is available for anyone to see. The most important part of being members was that it was the beginning of an educational journey which is ongoing.

DUE DILIGENCE AND IMPLEMENTATION OF THE MODERN SLAVERY POLICY

Our Modern Slavery Statement applies to all our work colleagues as well as our business and supply chain partners. To manage and oversee this we have a supplier assessment process integrated with our Ethical Procurement system. All suppliers are assessed based on a number of factors within a point's matrix, we examine modern slavery compliance, workplace policies, site hygiene standards, transparency of operations and ISO compliance. We have also developed an in depth questionnaire which has 92 questions. This allows us to rigorously analyse all aspects of our supply chain partners, including risk assessments covering employment initiatives, modern slavery, supplier compliance of the ETI Base Code, as well as many other facets of each supplier business. It is a comprehensive tool which will allow us to formulate a depth of information, and ultimately give us the visibility we need to choose our suppliers carefully.

Thus far all 54% of Gold tier suppliers and 26% of Silver tier suppliers have responded and we are compiling the results; by 2018 we hope to have all Gold, Silver and Bronze suppliers' information deepening our understanding of our complex supply chain. Critically, this will

POLICIES



SLAVERY STATEMENT 2017/18

give us a Key Value Indicator which we can use as a KPI moving forward. Our first results will act as a baseline on which to build and report, giving us better of all aspects of our supply chain, including the potential of modern slavery within it?

We are also working with the ETI on developing better relationships with other ETI members, to deepen our understanding of the threat of modern slavery within other sectors and how these businesses are going about dealing with it.

We are members of Sedex and have been audited according to their published methodology, this gives us the confidence that our governance as an organisation is directed and controlled with rigour, and thus, can strive for a better understanding of the required responsibility and accountability that comes with it.

RISKS WITHIN OUR SUPPLY CHAIN

Given the nature of our organisation, and the hugely diverse product lines we sell which are global in their supply chain reach, we felt it important to analyse risk countries against % of product lines sourced. Publications from Human Rights Watch, SEDEX, Transparency International and others inform our risk assessments which address modern slavery and other significant human rights and ethical trade issues.

Presently one third of products Commercial supplies have been identified as originating from countries considered to be of medium to high risk of practices of modern slavery or where there are other potential risks of human rights abuses. Commercial is therefore working with suppliers to address these risks and

We are continually striving for better visibility and transparency from our suppliers and their products.

TRAINING AND EDUCATION

We have spent the last 6 years working with our suppliers and the ETI on our organisational education based around the ETI Base code. We are now undergoing the same level of training and education with their help on the Modern Slavery Act. We will publish our progress in the next slavery statement 2018/2019, along with our set KPI's and questionnaire statistics.