

# Online Simplicity Ltd Slavery and Human Trafficking statement for the financial year 2022

## POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. Modern Slavery can take many forms, including the trafficking of people, forced labour, servitude and slavery. All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Online Simplicity Ltd. takes a zero tolerance approach to modern slavery and we are committed to acting professionally, fairly and with integrity in all our business dealings and supply chain relationships, wherever we operate implementing and enforcing effective standards and processes to uphold ethical standards and to combat modern slavery, human trafficking and drug smuggling.

## Introduction from the Board

We are committed to improving our practices to combat slavery and human trafficking. We will ensure that the organisations we do business with are aware of our Modern Slavery Policy and are provided with this statement.

## Organisation's Structure

The Statement covers the business activities of Online Simplicity Ltd , which are as follows: The transport of goods via road; rail, sea and air; warehousing and logistics. We are a same day distribution network. The company has employees nationwide and operates in a number of areas including international and overnight deliveries, as well as logistics, healthcare and medical.

## Our Supply Chains

Our supply chains include: recruitment in all areas; supply of IT services; provision of vehicle fleets, uniforms and HR systems.

## Our Policies on Slavery and Human Trafficking

We have a longstanding policy that we do not use or accept forced, bonded or involuntary prison labour or child labour. We only work with people who choose to work freely. We respect the right to equal opportunity and freedom of association. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We forbid any involvement in the form of drug trafficking. This can be understood as the exploitation of a person to commit a crime, such as drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Online Simplicity Ltd. maintains a number of key processes and activities to ensure compliance to the Modern Slavery Act:

The company is committed to ensuring that there is no contravening of modern slavery or human trafficking within the business and/or the services delivered. As part of our commitment to combating modern slavery, we have the following policies within our organisation:

**Employee Company Handbook:** The company handbook outlines the practices and procedures we expect employees to follow.

**Employee Code of Conduct:** The company expects the highest ethical standards from employees and other personnel in carrying out its business. The document provides employees with guidance on the standards expected when conducting business on behalf of the company.

**AntiBribery Policy:** This policy outlines the company's commitment and expectation to prevent all risks related to bribery and corruption.

## COMMUNICATION AND TRAINING

Where appropriate, we will educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chain. Through, inductions and training workshops and ad hoc monitoring of suppliers, employees are encouraged to identify and report any potential breaches of this antislavery and human trafficking policy (or any other policy).

## Due Diligence Processes for Slavery and Human Trafficking

To avoid the risk of slavery and human trafficking occurring within our supply chain we make sure that our employees, suppliers and partners are aware of our key policies and encourage them to adhere to the same high standards. These policies have been developed and adopted by the company in order to ensure that we conduct our services in an honest and ethical manner, at all times. Our suppliers are vetted and their ethical practises are reviewed to ensure they meet our high standards of ethical business practise.

## Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we ensure that all those involved in our supply chain are made aware of our requirements for compliance with slavery and human trafficking legislation.

We have a compliance team, which consists of involvement from the following departments:

- Audit, finance and compliance
- Human Resources
- Sales

## Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, the prevention, detection and reporting of modern slavery

in any part of our business or supply chain is the responsibility of all those working for Online Simplicity or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chain or any supplier tier at the earliest possible stage.

If it is believed or suspected that a breach of this policy has occurred, or that it may occur, employees are encouraged to notify their Line Manager and/or Compliance Manager, or report it in accordance with our Whistleblowing Policy as soon as possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring that no employee experiences any detrimental treatment if reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's slavery and human trafficking statement for the financial year ending 29<sup>th</sup> February 2022.

The Board of Directors endorses this policy and is fully committed to its implementation.