

Office Depot Anti-Slavery and Human Trafficking Statement

Corporate Structure

This statement comprises the Anti-Slavery and Human Trafficking Statement of Office Depot UK Limited for the financial year ending 31st December 2018, in accordance with the requirements of the Modern Slavery Act 2015. This statement sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chain or elsewhere in our business.

The Company is part of the wider Office Depot European Group of companies owned by Aurelius Equity Opportunities SE & Co KGaA a German based investment company listed on the Frankfurt stock exchange. The Company provides office supplies, services and solutions to a wide-range of business customers across the UK.

The Company's head office in the UK is based in Leicester with Distribution Centres in both Leicester and Ashton (Manchester) employing almost 1000 staff in the UK. We are committed to reviewing and continuously improving our processes for identifying and assessing modern slavery and human trafficking for the purposes of labour exploitation risks within our supply chain.

Our Policies

The Company values of Integrity, accountability, innovation, teamwork and respect are set out in our Code of Conduct and are the foundation upon which we conduct all our business decisions and behaviours. Our Supplier Guiding Principles sets out the Company expectations of all our vendors and sets out our policy on labour standards and human rights, including human trafficking and slavery, health and safety, environment, and bribery and corruption. All Vendors are required to adhere to these principles. The Company's Supplier Guiding Principles, (which can be found on our website at www.online.officedepot.co.uk under the heading "Business Solutions").

Our Supply Chain

The Company purchases products from vendors and suppliers across the globe. We source approximately a third of our own brand products directly from Asia through a third party global sourcing operation. We require all vendors to comply with our Supplier Guiding Principles.

In managing our vendors' and suppliers' adherence to our values, we undertake factory and warehouse inspections and audits via an appointed 3rd party service provider. Any instances of non-compliance are addressed on a case-by-case basis with actionable remediation plans put in place. It is our policy to cease trading with any third parties whom do not comply with our policies and whom are not actively participating in remediation plans.

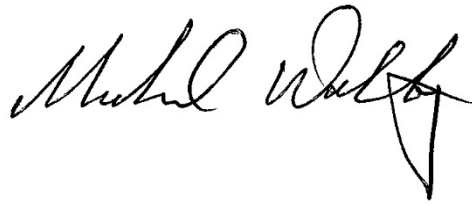
Our Training and Awareness Programme

The Company provides a compliance programme, which requires all employees to adhere to and be trained on our Code of Conduct (the "Code"). We also provide enhanced training for a variety of additional business risks within the wider European compliance training programme. Anti-human trafficking awareness training forms part of this training programme.

Whistleblowing Policy

We encourage our employees and interested stakeholders to report any concerns relating to potential breaches of our compliance policies and programmes via an independently run confidential hotline. All reports to the hotline are investigated.

Our Whistleblowing Policy is part of our compliance training programme for all staff and notices with the confidential Freephone number are prominently displayed on our sites and those of our partner manufacturing facilities.

A handwritten signature in black ink, appearing to read "Michael Walby". The signature is fluid and cursive, with a prominent loop at the end of the last name.

Signed Michael Walby

Managing Director Office Depot UK Limited