



Office Depot International (UK) Limited: Anti-Slavery and Human Trafficking Statement

This statement comprises the Anti-Slavery and Human Trafficking Statement of Office Depot International (UK) Limited (“**Viking**”) for the financial year ending 31st December 2020, in accordance with the requirements of the Modern Slavery Act 2015. This statement sets out the steps Viking, as part of the Office Depot Europe group of companies, has taken to ensure that slavery and human trafficking is not taking place in its supply chain or elsewhere in its business.

Corporate Structure

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

Viking’s head office in the UK is based in Leicester with distribution centres in Leicester and Ashton (Manchester). Together with its affiliated company, Office Depot UK Limited, the two companies employ approximately 800 staff in the UK. Viking and the wider Office Depot Europe group is committed to reviewing and continuously improving its processes for identifying and assessing modern slavery and human trafficking for the purposes of labour exploitation risks within our supply chain.

Values and Corporate Social Responsibility

Viking’s core values of *Integrity, Accountability, Innovation, Teamwork* and *Respect* are set out in its *Code of Conduct* and are the foundation upon which it conducts all its business decisions and behaviours. Further, Viking’s *Corporate Social Responsibility Policy* has three key themes which encapsulate its ethos of corporate social responsibility: *People, Sustainability* and *Environment*. As part of this, Viking is passionate in creating inclusive and fairly paid working environments that support the communities to which it belongs.

Supply Chain

Viking purchases products from suppliers across the globe. Viking expects all suppliers to comply with the *Supplier Guiding Principles*, Viking’s policy that sets out its expectations of suppliers. The *Supplier Guiding Principles* specifically sets out Viking’s policy on labour standards and human rights, including human trafficking and slavery, health and safety, environment, and bribery and corruption.

Viking also has a *Social Compliance Program* that allows it to assess if suppliers that provide own brand products comply with the *Supplier Guiding Principles* and Viking’s values. The *Social Compliance Program’s* methods of assessment are dependent on the risk level, and assessments involve independent audits and enhanced desktop reviews (including external reports reviewed / risk assessment questionnaires).

The *Social Compliance Program* creates transparency in the assessment of Viking’s own brand suppliers. A key aspect specifically looks at the working conditions of its suppliers and looks at: how hiring and termination of employees are dealt with; the remuneration of employees; the benefits available to employees; the working hours of employees; whether the employment terms meet the job expectations proposed at recruitment; whether workers are free from paying charges for recruitment and are otherwise free from debt due to recruitment or employment; whether workers maintain custody of their original identification documents; the freedom for employees to resign; whether employees have guaranteed freedom of movement during and after working hours; whether employees are able to decline overtime; and whether the supplier avoids any other abusive practices.



The *Social Compliance Program* enables Viking's procurement and merchandising teams to have greater confidence in ensuring its sourcing decisions only use suppliers that can ensure slavery and human trafficking does not exist within their businesses. Any instances of non-compliance of the *Social Compliance Program* are addressed on a case-by-case basis with actionable remediation plans put in place. It is Viking's policy to cease trading with any third parties that do not comply with its policies and whom are not actively participating in remediation plans.

Training and Awareness Programme

Viking requires all employees to adhere to and be trained on its *Code of Conduct*. Viking also provides 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

All employees and interested stakeholders are encouraged 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.

The *Whistleblowing Policy* is part of a compliance training programme for all staff and notices with the confidential freephone number are prominently displayed at Viking's sites.

A handwritten signature in black ink, consisting of a series of connected loops and a long horizontal stroke at the end.

Director

For and on behalf of Office Depot International (UK) Limited