



## Office Depot UK Limited: Anti-Slavery and Human Trafficking Statement

This statement comprises the Anti-Slavery and Human Trafficking Statement of Office Depot UK Limited (“Office Depot”) for the financial year ending 31<sup>st</sup> December 2019, in accordance with the requirements of the Modern Slavery Act 2015. This statement sets out the steps Office Depot has taken to ensure that slavery and human trafficking is not taking place in its supply chain or elsewhere in its business.

### Corporate Structure

Office Depot 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. Office Depot provides office supplies, services and solutions to a wide-range of business customers across the UK.

Office Depot’s head office in the UK is based in Leicester with distribution centres in Leicester and Ashton (Manchester) employing almost 1,000 staff in the UK. Office Depot 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

Office Depot’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, Office Depot’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, Office Depot is passionate in creating inclusive and fairly paid working environments that support the communities to which it belongs.

### Supply Chain

Office Depot purchases products from suppliers across the globe. It sources approximately a third of its own brand products directly from Asia through a third party global sourcing operation. As part of this, it requires all suppliers to comply with the *Supplier Guiding Principles*, Office Depot’s policy that sets out its expectations of suppliers. The *Supplier Guiding Principles* specifically sets out Office Depot’s policy on labour standards and human rights, including human trafficking and slavery, health and safety, environment, and bribery and corruption.

Office Depot also has a *Social Compliance Program* that allows it to assess if suppliers comply with the *Supplier Guiding Principles* and Office Depot’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 Office Depot’s 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 Office Depot'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 Office Depot'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**

Office Depot requires all employees to adhere to and be trained on its *Code of Conduct*. Office Depot 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 Office Depot's sites.

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

Director

For and on behalf of Office Depot UK Limited