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**MODERN SLAVERY
STATEMENT**

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1. Introduction

- 1.1 YPO is committed to good corporate governance and recognises the importance of operating effectively with the highest possible standards of openness, probity and accountability. This is reflected in YPO's corporate values and YPO is committed to preventing acts of modern slavery and human trafficking from occurring within each business within the Group and their respective supply chains, and seeks to impose those same high standards on its suppliers. We take a zero-tolerance approach to non-ethical practices 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 systems to uphold ethical standards and to combat modern slavery and human trafficking.
- 1.2 This Statement is provided in accordance with the requirements of Part 6 of the Modern Slavery Act 2015, to inform our Members, Associate Members, Customers, Staff and Suppliers about YPO's policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in our supply chains and the steps taken to identify, prevent and mitigate the risks.
- 1.3 *YPO is committed to supporting the UK Government's [National Action Plan](#), updated in May 2016, to implement the UN Guiding Principles on Business and Human Rights.*

2. Our Structure

- 2.1 YPO is the largest, self funding, non profit making, public sector buying organisation in the UK.
- 2.2 YPO is governed by a joint committee of local authorities. A full list of member and associate member authorities can be found at <https://www.ypo.co.uk/about/governance/structure>; however, as a central purchasing body, as defined by the EU combined Procurement Directive, YPO frameworks are open for use by any public sector organisation within the UK.
- 2.3 YPO operates nationally supplying Schools, Colleges and Universities, major Local Government departments including Social Services, Catering, Transport, Highways, Building Services, Administration and Waste Management as well as Emergency Service Authorities.
- 2.4 As, a business, YPO's annual spend is in excess of £600m through both catalogue and contractual spend. This spend warrants a statement on the risks inherent in our supply chains and the steps we are taking to address them, in line with YPO's leading practices in sustainable and responsible procurement.

3. Our Policy

- 3.1 This Policy explicitly addresses YPO's position in relation to Modern Slavery and Human Trafficking and also links to other YPO policies and procedures:-
 - 3.1.1 Ethical Trading Policy
 - 3.1.2 Anti-Fraud and Bribery Policy
 - 3.1.3 New Product Introduction (Global Sourcing)

- 3.1.4 Risk Management Framework
- 3.1.5 Quality Policy
- 3.1.6 Corporate Social Responsibility Approach
- 3.1.7 YPO Contracts Manual

4 Spend Categories

- 4.1 YPO spend categories normally fall within the following areas, which may present risks of abuse of Human Rights:
- Global Sourcing
 - Energy Products and Services
 - Highways, Fleet and Building Materials
 - Professional Services
 - ICT Equipment and Services
 - Education Learning and Office Supplies
 - Facilities Management Goods and Services
 - Furniture Goods and Services
- 4.2 The principal spend categories that we believe carry higher risks to human rights are global sourcing, office supplies and ICT equipment.

5 Due Diligence Process

Global Sourcing

YPO has robust procurement processes in place and employs a Global Sourcing Manager who is also responsible for liaising with global suppliers and undertaking initial checks on capability and suitability of these suppliers to meet YPO's needs. All global suppliers are required to have an ethical audit, and where they do not already have appropriate certification, Supplier and Factory Inspections are undertaken at YPO's request by an experienced independent organisation. YPO reserves the right to undertake ad hoc checks including pre-shipment checks on the goods to be despatched to YPO in the UK.

Office supplies and Educational Products

YPO have several frameworks in place for the purchase of Office Supplies and Educational Products to enable YPO to include these products in their catalogues and for Customer to be able to carry out a call-off tendering exercise from the established Frameworks. A wide range of products are supplied, many of which are sourced by our distributors from producers in low-cost countries, including YPO's own brand products, where modern forms of slavery are prevalent. YPO has procurement arrangements in place to enable customers to order office supplier and educational products from its catalogues and/ or carry out a call-off tendering exercise from established Frameworks. A wide range of products is supplied, including Own Brand products. Many of these are sourced from producers in low-cost countries, where modern forms of slavery are prevalent. In addition to the measures in place where product is sourced directly (above, see paragraph 5.1), YPO is committed to working with its suppliers to reduce the risk of modern slavery and human trafficking.

Where a new supplier of catalogue products does not have an ethical policy or ethical audits in place they are asked to comply with the [Base Code](#) of the [Ethical Trading Initiative](#) (ETI), which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

- Employment is freely chosen;
- Freedom of association and the right to collective bargaining are respected;
- Working conditions are safe and hygienic;
- Child labour shall not be used;
- Living wages are paid;
- Working hours are not excessive;
- No discrimination is practised;
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

ICT Equipment

YPO leads and also collaborates in procurements for ICT equipment including desktop and notebook personal computers. These procurements can be used by other Contracting Authorities to enable them to purchase ICT Equipment. YPO in its own procurements and in any collaboration ensures that a robust procurement takes place and that suppliers are checked regularly to ensure that they meet their contractual obligations and any legislative obligations including any obligation in relation to Regulation 57 of the Public Contracts Regulations 2015.

- 5.1 To date we have found no instances of modern slavery in our operations or supply chain. However, the limitations in our approach do not yet enable us to say unequivocally that there are no such instances occurring.
- 5.2 YPO specifically sources Fairtrade-certified products. Whilst this does not remove the need for due diligence, it does provide some measure of assurance, and certification is checked for all products.

6. Training and Raising Awareness

- 6.1 YPO has a large number of staff who already hold or are working towards a Professional Qualification from the Chartered Institute of Procurement & Supply (CIPS). CIPS also has an on-line training module on ethical procurement and supply that is available to all members.
- 6.2 YPO has mandatory e-training courses and courses provided internally by YPO's Employee Development Team as well as access to other internal and external expertise and training.
- 6.3 YPO provides procurement training to all personnel and has an internal compliance team who are responsible for ensuring that all procurements are carried out in compliance with the Public Contracts Regulations and Internal Policies and that all YPO's procurement policies, procedures and templates are robust.

7. The Future

- 7.1 YPO affirms its commitment to transparency within their supply chain and ascertaining a better understanding of the responsibilities the supply chain have and to the people working for them.
- 7.2 We will continue to work with our suppliers and our Members, Associate Members, Staff, Suppliers and other stakeholders to share best practice and to encourage more of them to commit to managing the risks to human rights in their supply chains. We are working with all groups and prioritising the groups that we have identified as representing a higher risk of modern slavery, human trafficking, forced and bonded labour and labour rights violations.

This Statement has been approved by the Board and published by YPO and will continue to be reviewed on an annual basis.

Paul Smith
Executive Director
June 2017

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