



---

## ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT 2025-26

(for the financial year ended 31 December 2024 being the period from 01 January 2024 to 31 December 2024)

Modern slavery (just like any form of slavery) is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking. Whatever form it takes, the common theme is the deprivation of a person's liberty by another, in order to exploit them for personal or commercial gain. It can be obvious but it can also be very subtle and hard to detect and, if detected, stopped and prevented from reoccurring, or from re-starting in a different form.

At **eVO** we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that, as far as we can ensure, modern slavery is not taking place anywhere in our own business, or in any of our supply chains. We are also committed to ensuring there is transparency in our own business, and in our approach to tackling modern slavery throughout our supply chains.

### OUR ORGANISATION

This statement is made by each of the following holding and trading entities (collectively referred to as the “**eVO** Group of Companies” or “**eVO** Group”).

#### Holding Companies

- **eVO** Global Holdings Limited (the group’s ultimate holding company, which is also known within the group as “Top Co.”) – company number 16294075
- **eVO** International Holdings Limited (the group’s intermediate holding company, which is also known within the group as “Mid Co.”) – company number 16305962
- **eVO** Business Supplies Limited (first intermediary holding company) – company number 09060494
- **eVO** Group Services Limited (second intermediary holding company) – company number 06257099

#### Trading Companies



- 
- Banner Group Limited (trading / operating as Banner, Truline and incorporating WA Office, Ventura, Subec and Spectrum and, from 25 May 2022, also trading online as Staples.co.uk) – company number 05510758
  - VOW Europe Limited (trading / operating as VOW Wholesale and Truline) – company number 01204488
  - VOW Retail Limited (trading as VOW Retail) – company number 05383376
  - Banner Business Solutions Limited (which, since 09 January 2023, following its acquisition of certain of the business and assets of CB Realisations Limited (in administration) (formerly Complete Business Solutions Group Limited) (in administration), and certain of the business and assets of its group trading companies (in administration), has traded as Complete) (“**Complete**”) – company number 02405637
  - Premier Vanguard Limited (trading as premvan) – company number 01583045

All EVO Group companies are incorporated and registered in England and Wales. EVO Group is a multi-channel distributor of business supplies and operates throughout the United Kingdom and the Republic of Ireland.

This statement includes the steps each of our trading companies have taken during the twelve month period prior to this statement in order to minimise the risk of modern slavery or human trafficking.

This statement is made collectively by and on behalf of all companies within the EVO Group and, also, individually by each entity listed above as if each entity is making its own separate statement.

The registered office address of the group’s ultimate parent company, EVO Global Holdings Limited, is 1 Europa Drive, Sheffield, England, S9 1XT.

EVO Group has a collective annual turnover in excess of £36 million.

## OUR BUSINESS

Our business is made up of several different channels including direct channels, which supply goods and services directly to end users, and indirect channels, which supply goods and services to resellers and, also, eCommerce / online operations, and our logistics services division (Truline).



We have a number of distribution centres, hubs and offices across the UK and Ireland, with a total of 1,997 employees across the group as at the date of this statement.

## **OUR SUPPLY CHAINS**

Our supply chains are extensive and encompass many global suppliers, agents, contractors and resellers.

We source office products and business supplies with approximately 49% of the products we source being manufactured in Europe.

Based on our due diligence and risk assessments, we consider that our business and our supply chains are low risk in terms of modern slavery and human trafficking.

Some suppliers from some areas within Asia are considered of higher risk, and we pay particular attention to suppliers from these countries in our due diligence and risk assessment processes.

## **STEPS WE TAKE TO ADDRESS AND DEAL WITH RISKS OF MODERN SLAVERY**

### **1. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring our supply chains and/or any part of our business are, as far as we can ensure, free of any form of modern slavery or human trafficking. As part of our commitment, we have in place an Anti-Slavery Policy, a Corporate Social Responsibility (CSR) Policy and a Sanctions Policy, each of which sit alongside various other policies (the “Policies”).

The Policies reflect our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls so as to ensure that, as far as possible, slavery and human trafficking is not taking place anywhere in our supply chains and/or within our business.

All employees, customers, suppliers, agents and consultants are subject to our Anti-Slavery Policy and our CSR Policy, and our Policies generally, which are incorporated into the relevant contracts. In situations where our suppliers or customers require us to adhere to their Anti-Slavery policies and/or their CSR policies, we ensure these are at least as stringent as our own policy/ies and procedure(s).



As part of our 'onboarding' process for new suppliers, all new suppliers are required to adhere to our Policies as part of commencing trading with us and throughout our ongoing relationship. Where any prospective new supplier does not accept our Policies (because they insist on usage of their own), we take steps to ensure that their policies and procedures are at least as stringent as our own, or we do not deal with them as a supplier.

## **2. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

Our Terms and Conditions of Purchase require our suppliers to implement due diligence procedures in respect of their own suppliers and subcontractors, so as to ensure (as far as we can), there is no slavery or human trafficking happening in their supply chains – which are, of course, an extension of our own supply chains.

Suppliers are also required to commit to not purchasing any raw materials, component parts or products which from any country/ies that are subject to any form(s) of sanctions, or which have been sourced from producers or manufacturers using forced labour in their operations, or which are otherwise inconsistent with our Policies.

In order to continue to identify and mitigate risk, and building on our communications with all of our live suppliers sent previously – as stated in our prior statement, we wrote to all of our live suppliers asking them to confirm, amongst other things, the steps they have taken to ensure human trafficking or modern slavery is not taking place in their supply chain – we shall be doing this with all new suppliers going forwards. We will also revisit existing live suppliers at least every two years.

We have developed new processes around UK and European suppliers, and we have re-assessed the risk(s) in the extended supply chain (beyond the UK and Europe). Once again we are pleased to report, as we reported in our prior statement, that our enquiries have not uncovered any instance of modern slavery or human trafficking. However, we have worked with several suppliers on malpractice such as Health and Safety issues and excessive, paid working hours.

We have maintained (and will continue with) our updated supplier onboarding processes. All new suppliers are required to provide information about their supply chains and to confirm acceptance of and compliance with our Policies.



---

The new risk assessment process for modern slavery and human trafficking (under which all products and suppliers will be risk assessed every six months) that we created in quarter 3 of 2023 continues to be operated. The risk is determined according to our targeted risk mapping process, the extent of which is determined by the nature of our relationship with the supplier, the country of manufacture of the product(s) they supply, and the type(s) of product(s) concerned.

Our updated our Anti-Slavery Policy continues to be applied. This reflects the changes we made to our risk assessment process, and to highlight key performance indicators on which we report annually to the EVO Group board.

### **3. BUSINESS SPECIFIC CONTRACTS**

To ensure continued adherence and commitment to tackling modern slavery and human trafficking, we continue to use our standard terms and conditions of sale, or other appropriate (freely negotiated) terms, as required by and agreed with our customers.

Such terms impose an obligation on all customers of each group trading company to adhere to the Anti-Slavery Policy, or have in place a similar policy, which achieves, as a minimum, the standards set out in our Anti-Slavery Policy and our Policies generally.

Our terms and conditions also oblige our customers to not engage in any activities that constitute modern slavery or human trafficking. We continue to use our updated standard terms and conditions of purchase with suppliers, or appropriate other terms (where required), thereby placing a legal obligation on our suppliers to comply with the provisions of the Modern Slavery Act 2015.

We are satisfied this approach places the required legal obligation(s) on our suppliers and that, in conjunction the application of our Policies and procedures, this ensures we have taken sufficient steps to minimise the risk of modern slavery or human trafficking in our and our suppliers' supply chains.

Bearing in mind the added constraints upon all businesses, caused by rises in inflation and the general increase in operating costs that has brought to practically all businesses, together with the added pressure caused by the continuing situations in the Ukraine, the Red Sea and the Middle East regions, we feel this is a notable achievement in the current economic and operational climate.



---

As the world continues to be volatile, uncertain, complicated and ambiguous – especially with the introduction of various international trade tariffs – we consider that our current approach works well, and that it will continue to do so. Nevertheless, we are not complacent and we remain vigilant; prepared to do whatever is necessary in this area to ensure compliance.

#### 4. TRAINING

To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our business, and in our supply chains, we have provided training to our staff. This training will be repeated in the forthcoming year. Staff joining since our last statement will also have received (or will receive within a month of joining us) appropriate training.

Since our last statement, we have continued to provide specific training to all of our staff involved with the procurement of goods and/or services on the updated Anti-Slavery Policy and associated issues and procedures; plus all of our other policies.

In early 2024, we added further information on our groupwide intranet to raise awareness of Modern Slavery and Human Trafficking issues within the UK and Ireland. We intend to add to and update this periodically, as our trading environment expands and adapts to the changes we are seeing in trading patterns.

#### 5. STEPS TAKEN SINCE OUR LAST STATEMENT

##### **Steps prioritised in our prior statement**

We are pleased to report that all of the steps in section 5 (Further Steps) of our prior statement (for both all EVO Group companies and Complete) have been successfully and fully completed and implemented.

We will continue to build upon this success by reviewing matters across the group in the forthcoming financial year (01 January 2025 to 31 December 2025).

##### **Eco Vadis Accreditation**

In addition, certain EVO Group trading companies have obtained Eco Vadis accreditation as below.



- Banner Group Limited – Gold Sustainability Rating
- Complete – Silver Sustainability Rating
- VOW - Silver Sustainability Rating

## 6. STEPS WE PLAN TO TAKE IN THE NEXT TWELVE MONTHS

We intend to continue with our current approach, which we will adapt and which will continue to evolve as our business continues to grow and our Modern Slavery and Human Trafficking due diligence and processes need to develop.

In particular we will –

- Provide further and refresher Modern Slavery Act training for all relevant staff engaged in the procurement of goods and/or services.
- Continue our programme of random spot checks on suppliers (where we select a supplier at random and carry out a Modern Slavery compliance check / audit to ensure compliance).
- Continue our ongoing programme of encouraging not only compliance but a higher level of supply chain due diligence and compliance over and above current achieved and audited standards.
- Upload our Modern Slavery statements to the Government’s voluntary Modern Slavery Statement Registry at <https://modern-slavery-statement-registry.service.gov.uk/>.
- Explore the possibility and viability of implementing some form of confidential, third party Modern Slavery and Human Trafficking reporting tool, such as that maintained by Unseen UK (<https://www.unseenuk.org/>), namely the UK Modern Slavery & Exploitation Helpline on 08000 121 700 or the online reporting tool they host (see <https://www.modernslaveryhelpline.org/report>).



- Look to implement an additional layer of continuous improvement, taking into account the Government’s recently issued new Modern Slavery guidance (“the Guidance”). Specifically, where appropriate to business need (and without contravening any confidentiality obligation(s) owed to any third party/ies), we will consider where and how we can make additional level 1 disclosures in our future statements and, if possible, where we can start to make level 2 disclosures (in each case, as such terms are categorised in the Guidance) – with the first stage in this development being to commence a more detailed supply chain mapping exercise.
- Conduct our business operations with an expectation of finding some risks and/or instances of modern slavery. We recognise that audits, whilst a powerful tool, will not uncover all instances of modern slavery where it is not immediately apparent. As such, we do not believe that audits should be singularly relied upon, and that worker-centred practices (such as worker voice procedures and engagement with worker associations and representatives) should be sought out, where viable.
- Where we discover any modern slavery malpractice, we will consider how it can be remedied, and our part in that process – wherever possible, ensuring that those who have been directly impacted receive the support, justice and opportunity necessary to recover and rebuild their lives. Where appropriate, we will disengage with any party engaged in practices that are unlawful, or which we find incompatible with our zero tolerance approach to combatting and stamping out modern slavery. We will always try to facilitate the mitigation or ending of any adverse findings. In this regard, we recognise the need to exit relationships responsibly, or at all, as exit may have a greater adverse impact on those affected than if mitigation or ending of malpractice measures are implemented. All cases will be assessed and dealt with on a case by case basis, with the pervading theme being to seek and eradicate modern slavery within our supply chains.

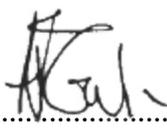
## DECLARATION

This statement is made by EVO Group pursuant to section 54(1) of the Modern Slavery Act 2015 (as amended), and it is made for and on behalf of all companies in the EVO Group.

This statement is for the financial year ended 31 December 2024, i.e. covers the period from 01 January 2024 to 31 December 2024.



Furthermore, this statement covers additional matters, namely the steps we intend to take in the next twelve months until our next statement is due (by the end of June 2026).

Signature:  .....

Name: Andrew Gale

Office Held: Chief Executive Officer  
evo  
(For and on behalf of all companies in the EVO Group)

Date signed: 18 June 2025