

A photograph showing a group of people in a meeting room. They are seated around a long wooden table, and some are writing in notebooks. The scene is dimly lit, with a focus on the hands and notebooks in the foreground. The background is blurred, showing other people and what appears to be a window or wall with some posters.

Modern Slavery Policy Statement

Introduction

This statement sets out Blue Square's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the retail marketing sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

The information in this statement details policies, processes and actions we have taken to ensure that slavery and human trafficking are not taking place in our supply chains or any part of our own business. It covers the activities of all businesses within the Blue Square Marketing Group and is our Modern Slavery statement for the financial year ended 31 December 2019 required under the provisions of the Modern Slavery Act 2015 (the "Act").

Responsibility for the policy

Blue Square has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

This statement was approved on behalf of Blue Square Marketing Limited by:

A handwritten signature in black ink, appearing to read 'A Leaver', enclosed within a circular scribble.

Andrew Leaver
Group Managing Director

Organisational structure and supply chains

This statement covers the activities of Blue Square Marketing Limited.

Blue Square Marketing is a retail marketing agency. We specialise in a wide range of marketing and related activities, including:

- Field marketing activity, recruiting and training product and brand ambassadors on behalf of our clients; within retail stores and via online platforms
- Retail data and market insight & analysis services
- Coordination of social media brand advocacy
- Training retailers and contact centre teams to drive product sales on behalf of clients
- Design and implementation of staff and sales incentive schemes

Countries of operation and supply

Blue Square is based in the UK. We carry out the above activities with employees across the UK and Ireland.

We have assessed the risk of modern slavery in our operations to be low on the basis that:

- We only operate in two countries, UK and Ireland which have modern, robust employment protections and practices
- We work with UK/Ireland based, or well-known international suppliers subject to similar protections and practices
- All employees and casual workers are directly employed by the business. We do not currently have any staff employed by a third-party recruitment agency.
- We do not act as a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities. Our Modern Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Tell Someone (whistleblowing) policy

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees can make reports to HR directly or via our confidential email address tellsomeone@bluesquare.uk.com

Employee conduct policies

Our employment contracts and disciplinary policies make clear to employees the actions and behaviour expected of them when representing our organisation and our clients. We strive to maintain the highest standards of employee conduct and ethical behaviour.

Supplier/Procurement code of conduct

We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of our supplier code of conduct will lead to the termination of the business relationship.

Approach to recruitment

Presently all our workers are directly employed by the business, allowing us to appropriately manage all employment practices directly. We have a robust recruitment process in place to engage with potential candidates.

Health and safety

We take a proactive approach to the health, safety and wellbeing of our employees, including through the use of appropriate health and safety policies and handbooks; incident reporting tools; confidential employee assistance helplines & counselling

Supply Chain Due Diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. As a minimum, we expect both ourselves and our suppliers to comply with all applicable local laws and regulations providing safe working conditions, treating workers with dignity and respect, and acting fairly and ethically.

In exercising supplier due diligence, we use a risk-based approach to ensure we focus on those areas where the risk is greatest and maximum impact can be achieved.

Blue Square will work to remedy any areas in which suppliers do not meet our standards or do not comply with relevant regulations. This may ultimately include ceasing trade with suppliers who show persistent disregard for important elements of environmental, social or ethical performance or that do not meet our internal criteria for selection.

Training

As part of our initiative to identify and mitigate risk we operate a range of policies and procedures appropriate to our businesses which all staff are trained on in their induction. These include policies and procedures in relation to Anti-slavery and Human Trafficking. These are reviewed and updated when necessary.

Awareness raising

As well as training staff, we have raised awareness of modern slavery issues by using our internal communications channels such as our InSquare intranet site to make employees aware of the Act and the drivers of modern slavery, as well as the possible indicators.

A copy of this policy statement is available on the Blue Square Marketing website (www.bluesquare.uk.com).