

Introduction

The statement is made pursuant the Modern Slavery Act 2015 ("The Act"). The Act applies to all of our activities.

We are committed to operating with openness, honesty, integrity. In keeping with this commitment and with our vision of a just world, free from poverty, we embrace the purpose of The Act and working towards a world without slavery and human trafficking.

We welcome the focus that The Act brings.

We have zero-tolerance towards slavery and human trafficking.

Our Structure and Organisation

We are a registered charity and are governed by a board of trustees.

We are based in London and employ around 230 permanent and contracted staff members.

We also work with independent contractors, consultants and others to deliver our organisational and operational needs.

We raise funds in many different ways, including through our annual campaigns (Red Nose Day and Sport Relief), events, corporate partnerships and the sale of merchandise.

In our own operations, we:

- Operate as a Living Wage employer & funder;
- Provide training for our staff on our policies; and
- Have a clear whistleblowing process for our staff and our contractors.

Merchandise and Due Diligence

We have reviewed our operations and believe that our highest point of risk of modern slavery is in the production of branded merchandise. Most branded merchandise is manufactured by our corporate partners, who share our zero- tolerance commitment to slavery and human trafficking and have embedded this into their supply chains.

Where we engage with our partners for the manufacture of merchandise, we contractually require these partners to comply with our Ethical Sourcing Policy (which includes an obligation to comply with The Act). Our partners regularly audit their process, practices, and standards, and

where such audits reference parts of the supply chain involved in the manufacture of our branded merchandise, we will actively and critically review such audits with our partners.

If we engage suppliers for branded merchandise directly (and not through a corporate partner), we apply the same approach; we require the suppliers to contractually commit to our Ethical Sourcing Policy and to work in accordance with The Act. We will regularly review (and audit) such manufacturing processes.

Outside of our supply chain, where we engage with partners who provide us with services, we will always contractually require those partners to comply with law (which includes The Act).

Comic Relief's Supply Chain

We do not own or operate any factories. Despite rarely being the dominant brand in any one factory we have long-standing relationships with our network of international suppliers, 80% of which have worked with us for 2 years or more.

Our top 3 sourcing countries provided 90% of the goods we produced in 2018 and 2019.

Risk Assessment

Unapproved Subcontracting

An area of identified risk in our product supply chain is subcontracting by suppliers or factories without our approval. This kind of activity puts workers at an increased risk of exploitation as we cannot verify the ethical trade standards at unauthorised sites. As a result, Comic Relief has now created a Subcontracting Policy that suppliers must sign up to and ensures that any subcontracting is declared to the Ethical Trade Team and must be approved before production can start.

Using unapproved subcontractors is seen as a breach of our policy and if discovered a review of the suppliers' business with Comic Relief will be undertaken.

Services supplied to Comic Relief

Comic Relief uses cleaners and employs agency staff. As part of the contractual process there is a section to ensure The Act is adhered to as a contractual agreement.

Goods not for resale

Comic Relief purchases goods for our use but not sold by Comic Relief such as IT equipment, office furniture. Our risk assessment shows these to be of low risk.

Implementing our Strategy

Our Modern Slavery Strategy consists of:

- 1. Our Ethical Audit Programme**
- 2. Projects to tackle areas of increased risk**

Our Ethical Audit Programme

Comic Relief now requires all *Tier 1 factories and manufacturing sites to have a valid third-party ethical audit. All audits must be conducted using the SMETA methodology or BSCI methodology.

*Tier 1 refers to the factories as declared by our suppliers and where Comic Relief's supply contract is assigned, and bulk production takes place. The facility is either owned or contracted by the Supplier.

Our audit criteria state that all new audits must be carried out on a semi-announced or unannounced basis and must have been conducted within the last 6 months to be valid for Comic Relief.

Comic Relief now grades all audits received for sites we use for production. This allows us to benchmark our factories in terms of ethical sourcing and ensuring that all factories are striving for improvement and best practice.

Tackling areas of increased risks

Where an increasing level of scrutiny is required, or where there is a higher risk of modern slavery, we have started to develop projects or join collaborative initiatives.

Raw Materials Sourcing

Products sold by Comic Relief include raw materials from countries all around the world. While we cannot know the provenance of every raw material in our products, we can identify particular risks and require that suppliers and factories avoid certain raw materials such as Uzbek or Turkmenistan cotton, which we do not allow due to concerns about forced and child labour during cotton harvesting.

Our Training Initiatives

To ensure a high level of understanding of the risks of modern slavery in our supply chains, we train our staff and trustees on our Ethical Sourcing Policy and Subcontracting Policy.

To date we have trained 198 Comic Relief employees on our Ethical Sourcing Policy which includes our actions on Modern Slavery.

We will continue to train all new starters at the organisation and in 2019/20 all existing and new trustees will be trained on our policies and our actions for The Act.

Improvements for next year

1. Policy Review – We will regularly review our policies and practices, so that we can identify issues and risks.
 - a. We are developing a wider Responsible Procurement Policy to ensure that as an organisation we seek value for money but also prioritise social value for suppliers selected.
2. Merchandise – Continue to work with our corporate partners and others who produce merchandise to ensure our ethical standards are adhered to.
 - a. We will be creating ethical sourcing training for our suppliers of merchandise at their sites and will also work collaboratively with our corporate partners on new Ethical Sourcing initiatives.
3. Due Diligence – We will continue strengthening our audit programme
 - a. We will have a focus on transparency in 2019/20 and aim to map our supply chain and further develop projects related to our merchandise suppliers.
 - b. We will be investigating ways to develop an ethical trade based project for UK manufacturers that could produce goods for Comic Relief.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our statement for the financial year ending 2020. It was approved by the board on 17 September 2019.



SIGNED

DATE 12 November 2019