

MODERN SLAVERY STATEMENT 2020

FINANCIAL YEAR ENDED 31 JULY 2020

The statement is made pursuant to the Modern Slavery Act 2015. It sets out our commitment to operating with openness, honesty and integrity. In keeping with this commitment and with our vision of a just world, free from poverty, Comic Relief embraces the purpose of the Act, applying it to all of our activities to work towards a world without slavery and human trafficking.

1. OUR ORGANISATION

We are a registered charity and governed by a board of trustees. The Comic Relief Group is comprised of Charity Projects, Comic Relief Limited and Brand Relief Limited.

Charity Projects is a company limited by guarantee and a charity registered with the Charity Commission and Office of the Scottish Charity Regulator. Charitable activity is undertaken through this entity and Comic Relief is the operating name of this entity.

Comic Relief Limited and Brand Relief Limited are private companies limited by shares and a wholly owned trading subsidiary.

We are head quartered in London and employ around 183 permanent and contract staff members. We also work with independent contractors, consultants, and others to deliver our organisational and operational needs. We raise funds in numerous ways, including through our annual campaign (Red Nose Day), events, corporate partnerships, and sale of merchandise. To find out more about the team leading the organisation, please visit: <https://www.comicrelief.com/about-comic-relief/meet-the-team/>.

In our own operations, we:

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

Our relevant annual turnover is under the £36 million reporting threshold. However, although we are not required to make a statement under the Act, we are making this statement voluntarily to demonstrate our commitment to ethical trading principles and to set out the steps we are taking to ensure our organisation and supply chains are free from modern slavery and human trafficking.

2. APPROACH TO TACKLING MODERN SLAVERY

Commitment to Ethical Trading

Our Ethical Sourcing Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships, and our commitment to the act through implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain. We recognise that our highest point of risk in our merchandise sourcing is in the production of branded merchandise and have taken steps to combat this. Compliance with our Ethical Sourcing Policy is measured against the Ethical Trading Initiative Base Code which is based on the International Labour Organisation Conventions.

We have a comprehensive and robust approach to contract management that helps ensure our procurement process is aligned to our Ethical Sourcing Policy.

Partners

Most branded merchandise is manufactured by our Corporate Partners, who share our zero-tolerance commitment to slavery and human trafficking. We require our partners to contractually comply with our Ethical Sourcing Policy. 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.

Non-Partners

When we engage suppliers for branded merchandise directly, we also require contractual commitment to comply with our Ethical Trading Policy and to work in accordance with the Act. We annually review, and audit, such manufacturing processes.

Outside our supply chain

When we engage with partners who provide us with services, we contractually require those partners to comply with law, which includes the Act.

Due Diligence and Risk Assessment

To identify and monitor the risk of slavery and human trafficking in our supply chain new suppliers are reviewed internally and then by Ethical Sourcing Consultants, highlighting any recommendations. Our key Corporate Partners have initiated audits in the supply chain. These have also been completed throughout the year.

Covid-19

The global crisis has created numerous different risks for workers within our supply chains. We have worked with our strategic partners to produce reports identifying what methods have been initiated in factories to ensure local guidelines and law are followed in relation to Covid-19 and that workers are kept as safe as possible with PPE and social distancing etc.

Effectiveness in combatting slavery and Human Trafficking

We use the following key performance indicators to measure how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Staff receiving training;
- Factory audit grading; and
- Clear process for reporting concerns.

Our strategy includes the following initiatives which are reviewed to assess their effectiveness:

Ethical Audit Programme

Comic Relief continues to tier its factories. Tier 1 refers to the factories 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. Comic Relief requires audits to be carried out on a semi-announced or unannounced basis and must have been conducted within the last 6 months to be valid. Comic Relief grades all audits received for sites we use for production. This allows us to benchmark factories in terms of ethical sourcing and ensuring that all factories strive for improvement and best practice.

Ethical Sourcing Projects

There are areas where there is higher risk to modern slavery, which we feel require increasing levels of scrutiny. We have made good progress with key Corporate Partners this year to develop Ethical Sourcing initiatives which we will continue to progress over the next year.

Training Initiatives

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will continue to provide training to our staff and will continue to work closely with our key corporate partners on ethical trade programmes.

Our financial year end is 31 July 2020. The publication of this statement is delayed due to the impact the pandemic has had on our operation, including an organisational restructure and staff changes.

This statement is made pursuant to 54(1) of the Modern Slavery Act 2015 was approved by the Board of Trustees of Comic Relief and signed by Matt Hyde.

SIGNED: *Matt Hyde*
Matt Hyde (May 18, 2021 17:40 GMT+1)

DATE: May 18, 2021

Modern Slavery Statement 2020- JB update 210421

Final Audit Report

2021-05-18

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