

## **Modern Slavery Act Statement**

Ideal Shopping Direct Limited takes its social responsibilities seriously and conducts its business in accordance with its core values of integrity, respect, commitment and creativity. We recognise that business practices can always be improved and we are therefore committed to continuously improving our practices to ensure that slavery and human trafficking are not present in our business or our supply chains. We will not knowingly support or deal with any business involved in slavery or human trafficking.

### **OUR BUSINESS**

Ideal Shopping Direct Limited is an independent multi-channel home shopping retailer selling a wide variety of goods to consumers through our TV channels (which are broadcast into the UK and the US) and our websites. The company's main operating site is in Peterborough, UK. The company also owns and operates other sites in the UK and in China.

This statement is made on behalf of Ideal Shopping Direct Limited but all principles, policies and processes are or will be disseminated to our group companies.

### **OUR SUPPLY CHAINS**

We procure the wide range of goods which we sell from manufacturers who are based not only in the UK but in many countries worldwide. This also applies to our own brand products.

Our business also covers a number of activities including advertising and marketing, IT services and broadcasting activities. We outsource the following activities in the UK:

- delivery of products to our customers
- agency labour in our warehouses
- facilities management, including security, maintenance and cleaning.

Our call centre service is outsourced to a company based in India.

We require our suppliers to commit to complying with all applicable laws and regulations. We expect the same level of commitment and high standards in tackling modern slavery from all of our contractors, suppliers and other business partners, and as part of our contracting processes we will review evidence of their commitment to tackling modern slavery, and we expect all our suppliers to hold their suppliers to the same high standards.

### **RISK ASSESSMENT AND ACTIONS**

We have assessed the risk of slavery occurring within our business. Similar to most retailers, the most likely source of slavery occurring in our business is through the product supply chain. We are attempting to mitigate this risk by increasing our knowledge of our suppliers' businesses, and adopting a risk-based approach to the assessment of our supply chain, which involves taking geographical, industry and market factors into account in order to identify categories of supply that may present a higher risk of modern slavery being present.

As part of such initiative to identify and mitigate risk we are taking the following actions:

- introducing contractual obligations that reflect modern slavery legislation across our standard terms and bespoke contractual arrangements;
- building the assessment of slavery and trafficking risk into our supplier sourcing, due diligence and on-boarding programmes;
- reviewing and assessing existing suppliers;

- developing a Supplier Ethical Code of Conduct (based on the Ethical Trade Initiative (ETI) base code) that reflects our commitment to acting ethically and with integrity in all our business relationships; and
- implementing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our business or supply chains.

We have assessed the product supply chain for goods sold under our own brands as higher risk since the majority of such goods are manufactured in the Far East. We have an in-house quality team with experience of working with factories to assess and improve adherence to quality and ethical standards, and we require such factories to be audited to recognised standards.

We consider our outsourced activities to be of a lower risk because the majority of our partners are large and reputable companies which are based in the UK. In relation to our call centre services provider, we regularly visit and monitor their activities, and conduct audits on their compliance with all applicable laws.

## **OUR BUSINESS**

As a responsible employer we adhere to UK employment legislation which we believe offers good protection to our workers. We review our employee policies regularly and these will be amended, where possible, to provide greater protection against modern slavery in the workplace.

Our employees are subject to and benefit from a range of policies which avert modern slavery (which includes an anti-slavery and trafficking policy, as well as a grievance policy, an equal opportunities policy and anti-bribery and corruption policy.) The policies and frameworks that we have in place limit the risk of modern slavery in the workplace and encourage all staff to work ethically.

We also operate a whistleblowing policy to enable our employees to raise any concerns they have, on a confidential basis if they prefer, and for those concerns to be investigated.

We have assessed the biggest internal risk being the use of agency workers in our warehouses. We keep under regular review the agencies we use to provide us with such workers, and require them to confirm their compliance to the Modern Slavery Act 2015.

We have introduced basic training for all new staff to ensure a higher level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

## **MEASURING EFFECTIVENESS**

In order to maintain the effectiveness of the steps we are taking to seek to prevent slavery and trafficking taking place in our business and supply chains we intend to:

- review the effectiveness of our anti-slavery and trafficking policy;
- ensure that employees are trained in relation to the Modern Slavery Act and slavery and trafficking risks in a format appropriate to their role; and
- assess and consider the appropriateness of developing further measures and systems including audit of specific suppliers where we assess that there may be a heightened risk of slavery and trafficking within their organisations.

## **CONTINUOUS IMPROVEMENT**

We understand that slavery and human trafficking are continuing risks and consequently we will:

- monitor developments in best practice;

- continue to build awareness within our business;
- identify any further training needs; and
- develop and implement further processes for identifying, assessing, mitigating and reporting specifically on modern slavery risks in our business and supply chains.

We will conduct an annual review of this Statement.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Ideal Shopping Direct Limited's slavery and human trafficking statement for the financial year ended 30 December 2018.

  
**Freidrich Trautwein**

**Director, Ideal Shopping Direct Limited**

Date: