

## Modern Slavery Statement 2024

### Introduction

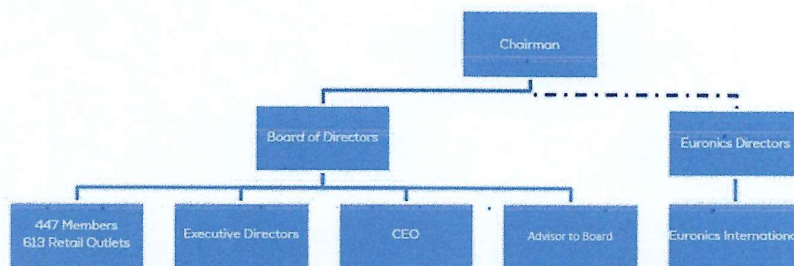
Modern slavery is when an individual is exploited by others for personal or commercial gain and includes but not limited to the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

In line with the requirements set out in section 54 of the Modern Slavery Act 2015 we, Combined Independents (Holdings) Limited, make the following statement for our financial year April 2023 to March 2024.

### Our Company Structure

Combined Independents (Holdings) Limited (CIH) is a not for profit buying group which is owned and governed by our membership (447 independent high street electrical retail specialists based throughout the UK with over 600 outlets). In many cases, our membership are family run businesses, some of which have been established for several generations, and part of many local communities and high streets that come together as part of a buying group. CIH also operates a second type of trading account which allows electrical retailers, who are not members, to purchase through CIH as an Associate with access to a limited range of the benefits open to our members.

Throughout the membership eleven geographical regional groups come together each providing a director creating the CIH Board of Directors. April 2023 saw the creation of the role of Advisor to Board.



CIH owns two purpose-built distribution centres Tankersley to service the north and Andover to service the south; working closely with a dedicated warehouse and distribution partner at each centre where we can offer three deliveries each week to our membership.

All of our colleagues are employed through CIH and are made up of experts in finance, human resource, IT, logistics, marketing, ecommerce and purchasing.

All of our CIH membership have the opportunity to be a part of our network of "Euronics Agents" and as such can operate by utilising the brand name Euronics, as well as trading to the public through [www.euronics.co.uk](http://www.euronics.co.uk). Euronics is the wholly owned subsidiary of CIH.

### Our Supply Chain

CIH works with a wide range of suppliers to provide the variety of products and services that we offer to our membership and agents. These products are purchased via local supplier divisions of global organisations where we work hard to build robust, open and honest partnerships.

In the normal course of running a business, as you would expect, we also work with suppliers to provide a variety of products and services.

We work closely with our CIH membership and our Euronics agents in the onward supply to the end consumer.

In all circumstances we expect that those we work with will comply with the spirit of the Modern Slavery Act.

### **Our Policies In Relation To Modern Slavery**

As well as caring about our membership, our agents and our customers we also care about our role in ensuring that slavery and human trafficking is not taking place anywhere in our business or wider supply chain and as such have a number of policies setting out the way we work.

Colleagues are required to read the Employee Handbook at the start of their employment and throughout their time with us and this is managed through sign off. Our handbook covers such policies as our Code of Conduct, Equal Opportunities, Harassment Policy, Professional Behaviour, Business Gifts and Corporate Hospitality and Whistleblowing Policy.

Our Modern Slavery statement is supported by yearly eLearning for all colleagues in Anti Bribery Awareness, Equality and Diversity and Modern Slavery Awareness training. Our Business Gifts and Corporate Hospitality policy is to help prevent bribery within the business and via our Whistleblowing Policy we provide an avenue for everyone to be able to raise any concerns.

Through our Professional Behaviour policy we expect our colleagues, irrespective of their role within the Company, to work professionally, ethically and with integrity at all times and we extend this expectation to our suppliers as well. For those suppliers where we offer products and services to our membership and agents, whilst we do not visit individual factories, we do visit our suppliers at their Head Offices here in the UK and internationally.

### **Our Improvements**

During the financial year we made the following improvements to support our efforts around modern slavery:

- continued to share our eLearning platform with our CIH membership as a tool to support them within their own businesses;
- rolled out Corporate Criminal Offence training to all Directors, SLT and applicable colleagues;
- improved our new supplier process to include a Modern Slavery Supplier Questionnaire which is to be completed or their respective Modern Slavery Statement provided;
- began a programme of rolling out the Modern Slavery Supplier Questionnaire to our existing partners; and
- participated in a project team to work with Euronics International to create a supplier code of conduct based on the Responsible Business Alliance with the view to roll out to all suppliers and in time incorporate into our terms of supply.

### **Our Due Diligence Processes**

As part of ongoing efforts we are committed to mitigating the risk of slavery and human trafficking throughout our supply chains:

- by identifying and assessing potential risk areas in our business;
- by ensuring our suppliers have the policies in place and work within the spirit of the Modern Slavery Act;
- via a thorough recruitment process where we carry out checks on all colleagues to ensure that they have the right to work in the UK; ensure all colleagues are introduced to the business; and that reputable recruitment agencies are used;
- to ensure that all colleagues are paid at least the real living wage;
- to ensure that all colleagues are aware of the ability to raise any concerns and that whistle blowers are protected;
- by maintaining policies that support our ethics and standards;
- by ensuring that all colleagues read and understand our Modern Slavery Statement and all associated policies;
- by providing regular training for all our colleagues;
- by encouraging our membership to use the eLearning platform where they don't have their own training methods; and



- by reporting both internally via our SLT weekly meetings and upwards to our board of directors monthly.

#### **Our Key Performance Indicators**

We will continue to rigorously follow our due diligence processes and closely monitor our organisation and our supply chains. In addition, we will also:

- implement a more robust due diligence process for our suppliers to ensure that they have the policies in place and work within the spirit of the Modern Slavery Act;
- continue to achieve a higher level of understanding of the risks of modern slavery and human trafficking throughout our organisation by ensuring all training of our colleagues is completed, that training statistics are reported to the Senior Leadership Team (SLT), that the SLT have the ability to review training completed in their own teams; and all colleagues are encouraged to identify and report any areas of potential concern;
- investigate any reports of concern on a case-by-case basis and implement any resulting action appropriately to the situation, changing policies and procedures where required;
- report monthly to the Board of Directors the number of members who have signed up to the eLearning platform;
- ensure that our Board of Directors complete the Anti Bribery, Modern Slavery, Equality and Diversity and Whistleblowing Awareness Training that is available to them via our eLearning system on a yearly basis and that completion of training is reported monthly to the Board; and
- that this statement is reviewed and agreed by the Combined Independents (Holdings) Limited board of directors annually as part of our commitment.

This statement was reviewed and approved by the Board of Directors on 30 April 2024 and as a consequence was signed by the Chairman of the Board Steve Scogings.



A handwritten signature in black ink, appearing to be 'Steve Scogings', written over a horizontal line.