

See differently

## Statement on modern slavery for the financial year ended 31 March 2025

### Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that RNIB has taken and is continuing to take to ensure modern slavery or human trafficking is not taking place within our operations and supply chain during the financial year ended 31 March 2025.

The statement applies to RNIB, those companies maintained for the receipt of legacies and our subsidiary operational companies:

- Action for Blind People
- Blind Centre for Northern Ireland (BCNI)
- Talking Newspaper Association of the United Kingdom
- National Library for the Blind (NLB)
- RNIB Charity
- RNIB Enterprises Limited
- RNIB Direct Services Lottery Limited
- RNIB Feel Good Friday Lottery Limited

RNIB acknowledges its duty to notify the Secretary of State of any individual encountered in England and Wales who it believes is a suspected victim of slavery or human trafficking.

### Statement

RNIB upholds the principles of human rights as established in the International Bill of Human Rights and adheres to the UK Modern Slavery Act 2015. We are dedicated to implementing and maintaining ethical practices within our operations and supply chain. RNIB expects all suppliers to demonstrate a strong commitment to these principles, mirroring the dedication that RNIB brings to its work. We actively support the thorough investigation and reporting of any suppliers who do not meet these standards, ensuring compliance and the betterment of industry practices.

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## Organisational structure and supply chains

As one of the UK's leading sight loss charities and the largest community of blind and partially sighted people, employing circa 1,100 people, and supported by circa 2,500 volunteers, we provide support and advice to blind and partially sighted people in the UK. With income of around £90 million, we provide a wide range of diverse goods and services sourced through our global supply chain. RNIB fully supports the Modern Slavery Act and takes its role seriously in ensuring that its supply chain is assessed and thoroughly checked to mitigate risk.

We aim to procure under the Code of Ethics of the Chartered Institute of Procurement and Supply. Suppliers of goods and services to RNIB must comply with legislation, regulation and standards relating to the relevant industry, including for example, child and forced labour, health and safety of workers, non-discrimination, employment law, human rights, fraud, bribery and corruption. We ask all our suppliers to adhere to our Modern Slavery and Human Trafficking policy and our Supplier Code of Conduct.

If we find evidence of a failure to comply with our policies, or a breach of the Supplier Code of Conduct, we will in the first instance try to work with the supplier to improve standards and employee welfare. However, we reserve the right to terminate an arrangement with any supplier immediately for appropriate transgressions or where there is no willingness to make the necessary improvements.

## Due diligence

As part of our risk-based approach to achieving compliance with the Modern Slavery Act, RNIB undertakes due diligence when considering taking on new everyday and preferred suppliers and commits to regularly reviewing existing relationships. The organisation's due diligence includes:

- Reviewing everyday suppliers to assess and monitor product, sector or geographical risks of modern slavery and human trafficking.
- Ensuring any new, everyday or preferred suppliers/contractors engaged through our Supplier Network (Proactis) confirm their compliance with the Act.
- Promoting and educating compliance of the Act through our procurement policy and associated procedures.

- Reviewing our supply chain as a regular component of risk assessment and management to ensure that risk is mitigated.
- Taking appropriate reporting steps if we suspect any evidence of slavery or human trafficking has arisen in our supply chain.
- When new colleagues are appointed to RNIB, they undergo a rigorous checking process throughout their employment life cycle including the right to work in the UK for all colleagues via a third party, to ensure compliance with legal requirements.
- For roles that involve safeguarding and working with vulnerable adults and/or children, we conduct thorough DBS and enhanced DBS where required vetting processes to ensure the appointed colleagues are suitable for such positions.
- We perform reference checks to ensure that new colleagues have no previous history or relevance for modern slavery concerns.
- As part of the onboarding process, all new colleagues are required to forward their National Insurance numbers and tax details via a P-45, which helps us verify that they have not been subjected to modern slavery trafficking.
- We monitor work permits to ensure that colleagues are legally allowed to work in the UK.
- Contracts are issued and signed to ensure that all employment details are transparent and compliant with our policies.

## **Relevant policies and practices**

RNIB has in place the following policies and procedures that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Modern Slavery and Human Trafficking policy - reiterating our stance against all forms of modern slavery, the policy outlines procedures and processes which are designed to guard against the occurrence of modern slavery or human trafficking in our business operations and supply chain.
- Supplier code of conduct and internal procedures to ensure requirements are applied to our everyday procurement activities - wherever possible RNIB insists on ethical standards from all suppliers. Suppliers are required to confirm that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

- Procurement policy - outlines due process for the procurement of goods and services. A questionnaire is used to assess whether an organisation satisfies minimum levels of economic and financial standing and technical and professional capability for suppliers not paid through purchasing cards.
- Guidance for purchasing card users relating to the consideration of our supplier code of conduct.
- Whistleblowing policy – encourages RNIB’s representatives (staff, volunteers, trustees) to raise any concerns related to the direct activities, or the supply chains of, the organisation without fear of reprisal. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- Safeguarding policies – ensure people accessing RNIB’s services are not harmed in any way through the organisations actions. The policies promote an understanding and awareness of safeguarding with customers (or their representatives, parents, carers) and RNIB’s representatives and covers the process for raising concerns about possible abuse or neglect by a staff member, volunteer, or any other person.
- Safer recruitment policy – Where external agencies are used to support recruitment RNIB will only engage with recruitment agencies which share our commitment towards anti-slavery and the prevention of human trafficking.
- Corporate social responsibility policy – to enforce that people must apply and maintain ethical and environmental standards when procuring goods and services for RNIB.
- Environmental Social and Governance Strategy – The strategy includes areas that align with Procurement. ESG reporting will meet the SASB (Sustainability Disclosure Standards) IFRS S1 and IFRS S2(International Financial Reporting Standards)

## Training

RNIB representatives are required to familiarise themselves with this statement, our supplier code of conduct and our Modern Slavery and Human Trafficking policy. Specific training on eradicating slave labour or human trafficking is available, on request, to relevant members of procurement staff and our network of approximately 120 supplier relationship managers. Any queries or questions must be directed to the procurement team who will be happy to assist.

## Our approach for continued improvement

- RNIB's Modern Slavery Policy will align with the Corporate Social Responsibility Policy (CSR) and Environmental Social and Governance (ESG) Strategy.
- Our Environmental Social and Governance (ESG) Strategy has recently been developed and approved by the RNIB's Executive Leadership Team.
- Managed review of internal procurement policies, procedures and guidelines that reinforce and complement this statement.
- Chartered Institute of Procurement and Supply professionals supported to achieve Chartered Status and complete annual professional development in ethics and modern slavery.
- Risk categorisation on our preferred suppliers and planned reviews with significant spend strategic vendors.
- Further develop our risk methodology for modern slavery with external/internal auditors.
- Review and improve our tracking and monitoring of supplier assessments using our source to contract and supplier relationship system.
- Establish an awareness training service that can be accessed by any appointed supplier relationship manager.
- Maintenance of Standard Terms and Conditions of Purchase introduced in 2020 to incorporate termination for breaching any aspect of our Supplier Code of Conduct.

This statement has been approved by the RNIB Board who will ensure it is reviewed and updated annually.



Matt Stringer  
Chief Executive, RNIB

Date: 25 September 2025