

# ANTI SLAVERY POLICY STATEMENT

This statement sets out the steps that Ordnance Survey Limited has undertaken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Ordnance Survey Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

We are committed to creating effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain and impose those same high standards on our contractors, suppliers and other business partners.

## COMPANY STRUCTURE AND SUPPLY CHAINS

Ordnance Survey Limited is Britain's mapping agency. Ordnance Survey Limited licenses a range of mapping products to businesses, local and central government bodies and consumers.

Ordnance Survey Limited is the parent company of Ordnance Survey International Services Limited and Ordnance Survey Leisure Limited (**Group**) whose activities form part of its supply chain or business. The Group has over 1000 employees worldwide. Ordnance Survey International Services Ltd has branch offices in Singapore and Bahrain, the latter is in the process of being closed. It has a Dubai Free Zone Limited Liability Company (Ordnance Survey International Services FZ-LLC) which has a branch office in Dubai. Ordnance Survey Limited recognises two Trade Unions and has formalised agreements regarding negotiation, collaboration and consultation.

The Group has a global annual turnover of approximately £161.7 million.

As such, Ordnance Survey Limited has an extensive supply chain and we procure goods and services in excess of £70 million per year. We work with a wide range of different suppliers, subcontractors and partners each of which will have their own subcontractors, affiliates and associate entities. Ordnance Survey Limited therefore is connected to multiple entities through numerous contractual relationships across many countries (for instance India, USA and mainland Europe).

## OUR POLICIES:

We operate a number of internal and external policies to ensure that we are conducting business in an ethical and transparent manner. These include:

### Internal Policies:

1. Anti-slavery guidance. Ordnance Survey's stance on modern slavery, it explains how employees can identify any instances of this and where they can go for help.
2. Procurement Policy which confirms that Ordnance Survey follows government procurement guidance, references modern slavery and the use of RACI outlining roles and responsibilities from tender to contract management.
3. Ordnance Survey's Personal Security Policy confirms that eligibility to work in the UK checks are conducted on all employees, including but not limited to checking an original passport, birth certificate or other qualifying documentation.
4. Whistleblowing Policy. This ensures all employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. This policy is included in the Employee Handbook.
5. Resourcing, Bullying and Harassment and Diversity and Inclusion Policies which ensure that Ordnance Survey provides an inclusive and accessible work environment culture where employees feel safe, respected and valued, free from bullying, harassment and discrimination.
6. Code of good business practice. This code explains the manner in which we behave as an organisation and how we expect our employees to act.

## External Policies:

1. Supplier Code of Conduct. Suppliers and their subcontractors must comply with the Supplier's Code of Conduct which includes compliance with the Modern Slavery Act 2015, a prompt payment commitment and ethical behaviour.

## **DUE DILIGENCE PROCESSES**

As part of our initiative to identify and mitigate risk, we:

- Operate strict procurement processes, requiring suppliers to comply with all applicable laws and standards, including those which relate to the Modern Slavery Act;
- Use a Modern Slavery Assessment Tool (**Tool**) prior to starting a tender to help assess the likely risks in respect of slavery and human trafficking when there is a high value spend and/or we are sourcing goods and/or services from regions where such incidents have occurred and/or if the supply chains extend into regional risk areas;
- Depending on the level of risk highlighted in the Tool, additional due diligence questions may be incorporated into the tender documentation, additional annual reporting requirements implemented and additional terms incorporated into the contract;
- Record such risk assessment outcomes separately for audit purposes;
- Base our tender documents on the government standard selection questionnaire (SSQ) with specific questions in the ITT response around the Modern Slavery Act and compliance with it;
- Expect our suppliers to have suitable policies and processes in place within their own businesses to prevent child labour, modern slavery and human trafficking and to cascade those policies to their own suppliers;
- Undertake a continuous review of assurance information from existing suppliers and partners, which includes gathering yearly assurance on modern slavery via contract management meetings and follow up where relevant;
- Request an annual updated response to Modern Slavery Act from our suppliers i.e. policy updates or published statement;
- Where known, maintain records of the sub-contractors used by our suppliers to support delivery of goods and/or services. If sub-contractors are unknown, a risk-based approach is adopted based on the information we hold and/or the type of goods and/or services provided by the supplier as to the level of risk further down the supply chain.
- Have included a specific item relating to the Modern Slavery Act in the agenda of the supplier contract management meetings enabling us to be kept informed of and monitor any changes. Note due to Covid 19, most supplier meetings are now undertaken online where standard agenda items are discussed;
- Include appropriate terms in our contractual documentation with suppliers:
  - obliging suppliers and their subcontractors, suppliers and employees to comply with the Modern Slavery Act;
  - obliging suppliers and their subcontractors to comply with the Supplier's Code of Conduct. A review of existing supplier contracts is ongoing and where the Modern Slavery provisions may not be sufficient, the supplier is required to sign the Supplier's Code of Conduct;
  - reserving the right for us to audit suppliers and their contractors, where we consider it appropriate;
  - obliging suppliers to report to us if they are aware of or suspect slavery or human trafficking in a supply chain connected to any Ordnance Survey contracts;
  - reserving the right for us to terminate the contract at any time should any instances of modern slavery come to light.
  - ensuring prompt payment by Ordnance Survey to suppliers within 30 days of receipt of invoice;
  - prohibiting suppliers from sub-contracting without our permission. If sub-contracting is permitted, all duties and obligations from the supply agreement must be included in the sub-contract;
  - requiring suppliers to pay its subcontractors within 30 days.
- The Procurement Team follow the advice and guidance in relation to the Modern Slavery Act set out in the Chartered Institute of Purchasing and Supply (CIPS) code of professional conduct.

The above procedures are designed to:

- Identify and assess potential risk areas in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Monitor potential risk areas in our business and supply chains.

## TRAINING

We conduct and record modern slavery training for our procurement teams on a quarterly basis and issue guidance to our employees so that they are aware of the issues surrounding modern slavery and what to do if they suspect that it is taking place within our supply chain.

## OUR PERFORMANCE INDICATORS

- Number of reports in 2019/20 indicating whether modern slavery practices have been identified in Ordnance Survey business or their supply chain: Zero.
- Number of complaints received by Ordnance Survey in 2019/20 via its grievance and whistleblowing mechanisms: Zero.
- No recorded instances of modern slavery within Ordnance Survey and/or its supply chain and any related corrective action have been identified in the financial year 2019/20.

## APPROVAL FOR THIS STATEMENT

This statement is made pursuant to section 54(1) of the *Modern Slavery Act 2015* and constitutes Ordnance Survey Limited's slavery and human trafficking statement for the financial year ending 31/3/20.

This statement was approved by the Board of Directors in September 2020.

**Ordnance Survey Limited**

**Signature** ..... 

**Name** Steve Blair .....

**Position** Chief Executive Officer .....

**Date** 28 September 2020 .....