

STATEMENT ON SLAVERY AND HUMAN TRAFFICKING FOR FINANCIAL YEAR 2016/17

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes TRBL's modern slavery and human trafficking statement for the financial year 1 October 2016 to 30 September 2017.

This statement provides background to our organisation and our supply chains, and sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in our organisation or any of our supply chains.

Our Organisation

The Royal British Legion ("*TRBL*") is a registered charity incorporated by Royal Charter with charity number 219279. We have three (3) subsidiaries that are companies limited by guarantee and eight (8) subsidiaries that are companies limited by shares. Of the subsidiary companies, one (1) is dormant and five (5) also have charitable status.

Since 1921, TRBL has aspired to deliver on its three key charitable objectives: we provide for the needs of the Armed Forces community of Service Personnel, veterans, and their families; we champion their interests with policy makers, legislators and authorities; and we commemorate their service and sacrifice through our Remembrance activities.

TRBL's objectives are to safeguard the memory of those who have fought and died in conflicts past and present, and to provide advice, information and support to serving men and women, veterans and their families in areas such as education, employment, mental and physical health and independent living. It is a role we continue to fill to this day. We are committed to ensuring that every member of the Armed Forces community is able to live happily and independently, with a sustainable future.

Our activities are overseen by our Board of Trustees who have ultimate responsibility for all that we do. TRBL's day-to-day management resides in the Executive Board which reports directly to the Board of Trustees.

Our policies and procedures

TRBL has a number of policies and procedures which reflect our commitment to acting properly in all of our business relationships, and we ensure that we implement and enforce effective systems and control.

TRBL has a commitment against slavery and human trafficking in all forms and strives to act ethically, at all times, in all of our work, business dealings and various relationships; ensuring that slavery and human trafficking does not take place within our organisation or our supply chains. As such, the Procurement Division is working on finalising the Ethical Procurement Policy.

TRBL's policies and procedures are applicable to all of our employees, as well as to those engaged on a temporary or consultancy basis.

The current key policies and procedures which contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chain include the following:

- **Risk Management Policy** – designed to keep all our activities in line with all applicable laws, regulations and codes of governance (including in relation to slavery and human trafficking).
- **Health and Safety Policy** – to ensure the wellbeing of all our employees and anyone else who may be affected by our activities.
- **HR procedures** – ensure that all employees hold the appropriate ‘right to work’ documents and are paid fairly and in accordance with the National Living Wage. Also, to put policies and procedures in place to protect the interests of all employees, including any unpaid work experience volunteers working at TRBL.
- **Procurement Policy** – we ensure that certain factors are taken into account when selecting our suppliers, including considering whether the supplier will be a suitable business partner. This involves detailed analysis of a supplier’s reputation, integrity and compliance with laws and ethical procedures.
- **Anti-Bribery and Corruption Policy** – to account and report any improper or suspicious behaviour or situations, and to report and deal with the risk of fraud and corruption.
- **Whistleblowing Policy** – provides guidance on how to report suspected dangers or wrongdoing in the workplace. All TRBL employees, including those engaged on a temporary or consultancy basis, are expected to report any concerns relating to slavery or human trafficking. Any concerns raised will be duly investigated with action taken as necessary without any unfavourable treatment on the individual reporting the concern.
- **Safeguarding Policy** – confirms our safeguarding commitment and principles for the protection of all children and adults at risk, who come into contact with TRBL and our subsidiary charities, The National Memorial Arboretum (NMA) and Poppyscotland.

Our supply chains

We deal with many organisations through our operational divisions and we use suppliers to support the operations of our organisation. The key areas in which we engage suppliers to provide goods and services are:

- Property/facilities management
- Online/Internet
- Goods and services
- Events (for example, fundraising, legacy and commemorative activities)
- IP/IT/Design
- Finance, legal and investments
- Professional services
- Fundraising services, professional fundraising
- Employment

TRBL’s template agreements and standard terms and conditions require suppliers to comply with the law. This includes specific reference to TRBL’s commitment against modern slavery and human trafficking.

Our supply chain due diligence

The Procurement Division, working with the Legal and Risk divisions, has reviewed our procurement processes to ensure that we take into consideration the different risks associated in our supply chains, including modern slavery and human trafficking. We continue to review our policies and procedures to ensure that they are effective and appropriate, and we will update these as necessary.

We carry out due diligence checks on key suppliers and will monitor their compliance with applicable law; including in relation to slavery and human trafficking.

We are satisfied that our key suppliers have appropriate policies in place in relation to modern slavery and human trafficking. We will continue to review all of our suppliers and regularly assess our key suppliers in more detail to ensure that they have appropriate policies in place to minimise the risk of slavery and human trafficking in their business.

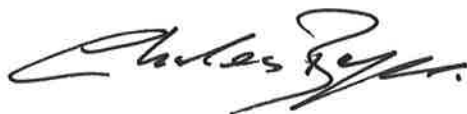
Due diligence and monitoring is ongoing and under periodic review to improve supplier vetting and to further minimise a range of risks, including slavery and human trafficking. This is being led by our Procurement Division; working with the Legal Division.

Training

We work hard to ensure that adequate information and training is provided to all TRBL employees, contractors or visitors on all relevant matters.

In terms of information and training:

- All new joiners attend an induction session which includes information and training on our policies and procedures. We will continuously review our induction sessions and ensure that we include specific reference to modern slavery and human trafficking and what we do to minimise the risk of this occurring in our organisation and our supply chain.
- TRBL managers are provided with relevant training and are assisted by our HR Division in HR-related matters including in relation to recruitment, remuneration and employee wellbeing.
- Our Procurement Division, assisted by our Legal and Risk divisions, will continue to seek out information and training to help identify risks in both our organisation and supply chain, including in relation to slavery and human trafficking.



Charles Byrne
Director General
30 November 2018