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FIN POL009
Modern Slavery Statement
2025/26

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1. Introduction

This statement has been produced in accordance with the Modern Slavery Act 2015. As a ‘commercial organisation’ defined by the Act, YPO has a legal duty to produce a statement and as a professional, responsible and socially conscious public procurement organisation, YPO recognise the importance of operating to high standards and expect the same of our supply chains. YPO take a zero-tolerance approach to non-ethical practices and are committed to always treating people in our business and supply chains fairly, with integrity to uphold ethical standards.

YPO are committed to eradicating slavery and human trafficking from our business and supply chains, guided by the UN Guiding Principles on Business and Human Rights and the 10 Principles of the UN Global Compact.

2. Our Business

YPO is the largest publicly owned public sector buying organisation in the UK. Established in 1974 by a group of 13 local authorities, governed by a joint committee and operate under the Local Authority (Goods & Services) Act 1970. A full list of members and associate member authorities can be found at <https://www.ypo.co.uk/about/governance/structure>. However, as a central purchasing body, defined by the Public Contract Regulations, YPO catalogue items and frameworks are open for use by any public sector organisation in the UK.

Based in Wakefield, YPO supply around 30,000 products and resources from our warehouse, as well as offering around 100 public sector framework agreements.

YPO customers are UK-wide and include schools, local authorities, charities, emergency services, the wider-public sector and other businesses such as nurseries and care homes.

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YPO categories of spend normally fall into one of the following areas;

- Corporate and Financial Services
- Education, Learning and Office Supplies
- Emergency Services
- Facilities Management
- Fleet and Highways
- Food and Catering
- Furniture
- Health and Social Care
- HR Services
- Technology and Communications
- Utilities

As a drive to offer YPO customers value for money, YPO have invested in an own brand range, typically covering products such as stationery, arts and crafts, sport and early years products. Some of these are sourced direct from overseas suppliers with 801* out of 1719 product lines classified as globally sourced. Following Brexit, YPO now classify any factory outside of the UK as globally sourced including those in Europe, this currently means that YPO source from 30 global factories across Bulgaria, China, Denmark, France, Italy, Taiwan and Thailand.

3. Due Diligence

With numerous categories of spend, YPO have a wide range of supply chains each with individual characteristics, covering both product and service-based supply chains. YPO therefore identify the areas of high risk to human rights and act accordingly.

Global Sourcing

Whilst YPO are aware that modern slavery can occur much closer to home, it also believes that global sourcing activity presents the highest risk of all, to human rights within YPO’s supply chains. Therefore, YPO have put in place a robust procurement and audit process. Ethical audits to the Ethical Trade Initiative (ETI) Base Code as a minimum are requested as part of the tender process and we request factories are re-audited at least every three years.

YPO work with Société Générale de Surveillance SA (known as SGS) as its appointed independent test house, however YPO also accept audits from other independent test houses where appropriate. Currently 95% of YPO globally sourced products are sourced from a factory that has been ethically audited to a satisfactory standard.

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Each year our Quality Assurance team sends a Global Sourcing Review to the category teams to inform them of the status of the factory audits within their categories to enable them to chase any outstanding audits as part of their supplier relationship management programme. An ethical review is also performed at the end of each year and presented to Senior Leaders as part of our ISO9001 Management Review.

All supply chains (including global sourcing)

As a UK Public Sector Buying Organisation, we have applied the approach set out in PPN 009. PPN 009, which replaces PPN 02/23 for procurements from 24 February 2025 onwards, builds on the original guidance by aligning with the Procurement Act 2023 and introducing enhanced requirements for tackling modern slavery in government supply chains. While PPN 02/23 focused on risk-based assessments during pre-procurement, PPN 009 expands this to include existing contracts, mandates supply chain transparency for high-risk procurements, and strengthens due diligence and exclusion grounds. It also updates risk indicators to reflect current global concerns, such as the sourcing of cotton, PPE, and polysilicon, and explicitly includes NHS bodies within its scope. Six key characteristics to consider

1. Industry type
2. Nature of workforce
3. Supplier location
4. Context in which the supplier operates
5. Commodity type and
6. Business / supply chain model

As part of the Conditions of Participation (CoP) the following questions relating to a supplier’s commitment to preventing modern slavery:

Question		
1.	<p>Tacking Modern Slavery in Supply Chains: Are you a relevant commercial organisation* subject to Section 54 of the Modern Slavery Act 2015?</p> <p style="text-align: center;">*‘Relevant commercial organisations’ are defined as commercial organisations that carry on a business or part of business in</p>	

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	the UK, supply goods or services and have an annual turnover of £36 million or more	
2.	<p>Modern Slavery Statement (or equivalent statement/document): If you are ‘a relevant commercial organisation’ subject to Section 54 of the Modern Slavery Act please provide a link or copy of your latest statement which covers the following points:</p> <p>The organisation’s structure, its business and its supply chains</p> <p>Its policies in relation to slavery and human trafficking</p> <p>Its due diligence processes in relation to slavery and human trafficking in its business and supply chains</p> <p>The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk</p> <p>Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate</p> <p>The training and capacity building about slavery and human trafficking available to its staff</p>	<p>Detail the web address to the document</p> <p>The name of the uploaded document</p> <p>Insert N/A if you are not subject to Section 54 of the Modern Slavery Act</p>
3.	If you are not a ‘relevant commercial organisation’ but have a turnover of more than £36 million, please provide a link or copy of your latest statement which covers the following points:-	<p>Detail the web address to the document.</p> <p>The name of the uploaded document</p>

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Alongside this, YPO also include in the Procurement Specific Questionnaire (PSQ) a number of questions around associated persons and intended sub-contractors and request detailed information on any identified persons/companies.

As part of our procurement process and due diligence on any tender exercise, additional questions or terms and conditions may be included to assess our suppliers and the supply chain specifically related to their approach to eradicating modern slavery. Including the standard “Mandatory Requirement” below;

<p>Please confirm that if you are successful in this Tender exercise that you would be willing to participate in YPO’s modern slavery improvement programme including completion of the modern</p>	<p>YES (PASS)</p>
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<p>slavery assessment tool. This will be arranged upon award. https://supplierregistration.cabinetoffice.gov.uk/msat</p> <p>If any risks are identified, the Supplier is expected to put in place plans and work towards mitigating this risk and share with YPO progress and the impact.</p> <p>Please confirm your acceptance</p>	<p>NO (FAIL)</p>
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Our procurements are also supported with a “Responsible Procurement Policy” which sets out the social value outcomes that are important to YPO. Theme 6 includes how our supply chains show commitment to Modern Slavery via our procurement activities;

Priority Theme	Example Outcomes
<p>Promote ethical trading practices within supply chains</p>	<p>Requiring global suppliers to provide third party evidence of good ethical practice, using the ETI Base Code.</p> <p>Quality Team conduct a modern slavery risk assessment at pre-tender stage and suggested mitigations</p>

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YPO Supplier Code of Conduct

The YPO Supplier Code of Conduct is now a mandatory condition of contracting with YPO and sets out our base expectations for its supply chains in relation to employment rights, working conditions, anti-slavery, non-discrimination and environmental protection. It is based on the [Ethical Trade Initiative Base Code](#) and reflects a number of YPO’s own values, which are Be kind, Do the right thing, Embrace creativity and Make a difference.

4. Our Policies

This statement explicitly addresses our position in relation to modern slavery and human trafficking however it also has links to other relevant policies and procedures;

- Social Value and Sustainability Strategy
- Responsible Procurement Policy
- Anti-Fraud and Bribery Policy
- New Product Introduction (Global Sourcing)
- Risk Management Framework
- YPO Quality Policy
- YPO Supplier Code of Conduct

5. Training and Raising Awareness

As a procurement organisation, we already have a large number of staff who hold or are working towards a professional qualification from the Chartered Institute of Procurement & Supply (CIPS). CIPS have a wide range of eLearning modules available for members including the Ethical Procurement and Supply which we encourage all staff to complete.

Internal training and guidance is provided to staff who are responsible for sourcing products from overseas.

A small number of staff have reviewed or completed the Home Office e-learning course and the Government Commercial College “Tackling modern slavery in supply chains: PPE case study” course.

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YPO are also committed to raising awareness by collaborating with similar organisations to discuss issues relating to Modern Slavery.

6. The Future

As a professional public sector buying organisation, YPO recognises the responsibility it has to embed social value into its business activities. This includes working towards eradicating modern slavery and human trafficking in our business and supply chains. YPO will continue to make further improvements and remain committed to an ethical supply chain by:

- Implementing a modern slavery mitigation programme by 2027 through:
 - Develop mitigation options and recommendations for the whole procurement cycle
 - Review and conduct gap analysis of current procedures

YPO will continue to work with its suppliers, member and associate member authorities, customers, staff and other stakeholders to share best practice and to encourage more commitment to eradicating slavery and human trafficking from all supply chains.

This statement has the support and commitment from the YPO Board who will review it on an annual basis.

*All figures are correct at the time of writing.

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Final Audit Report

2025-11-27

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