



# Cycle**to**Work

Modern Slavery and Human  
Trafficking Statement 2023

# Cycle Solutions (Cycle to Work) Ltd

## Modern Slavery & Human Trafficking Statement

### Introduction

This statement sets out Cycle Solutions actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1<sup>st</sup> September 2022 to 31<sup>st</sup> August 2023.

As part of the bicycle retail and benefits industries, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational structure and supply chains

This statement covers the activities of Cycle Solutions:

Cycle Solutions is a leading provider of the UK Government endorsed Cycle to Work scheme. Our activities involve the provision of benefits services and advice to corporate clients and their employees, as well as the supply of bicycles and related products.

#### *Countries of operation and supply*

The organisation currently operates in the following countries:

- Cycle Solutions operates in the United Kingdom

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

# Cycle Solutions (Cycle to Work) Ltd

## Modern Slavery & Human Trafficking Statement

Whilst our operations and those of our direct suppliers relate to the UK and European Union, many of the products produced by our suppliers are manufactured and distributed from outside of the EU. We require our suppliers to audit and evidence the fair and sustainable treatment of all aspects of supply and sourcing.

### *High-risk activities*

The following activities are considered to be at high risk of slavery or human trafficking:

- Manufacture and distribution of products and their raw materials in non-regulated territories (including China and the Far East). In particular, the use of child-labour within the supply chain.

### *Responsibility*

Responsibility for the organisation's anti-slavery initiatives is as follows :

- **Risk assessments:** The board is responsible along with the senior management team and procurement department for ensuring that all suppliers are aware of the risks of modern slavery in their supply chains.
- **Investigations/due diligence:** The board is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** Due diligence checks are undertaken when working with existing suppliers and potential new suppliers. This can on occasion involve visits to the overseas production sites of suppliers.

### **Relevant policies**

The organisation operates the following policies 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:

# Cycle Solutions (Cycle to Work) Ltd

## Modern Slavery & Human Trafficking Statement

- **Whistleblowing policy**

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our Whistleblowing policy to raise their concerns.

- **Employee code of conduct**

The organisation's code (Employee Handbook) makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier/Procurement code of conduct**

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment/Agency workers policy**

The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that

# Cycle Solutions (Cycle to Work) Ltd

## Modern Slavery & Human Trafficking Statement

agency.

### Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier [this may be part of a more general human rights or labour rights assessment];
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- reviewing its existing supply chains [expected to be completed by 01 January 2023], whereby the organisation evaluates all existing suppliers.

### Training

The organisation requires [all supply chain managers/HR professionals] within the organisation to complete training on modern slavery [as a module within the organisation's induction/

# Cycle Solutions (Cycle to Work) Ltd

## Modern Slavery & Human Trafficking Statement

mandatory training programme – Business Ethics].

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

# Cycle Solutions (Cycle to Work) Ltd

## Modern Slavery & Human Trafficking Statement

### Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually.

### Director's signature:

A handwritten signature in black ink, appearing to read 'Steve Edgell', written in a cursive style.

Director's name: Steve Edgell

Date: 06.12.2022