

# Which?\* Anti-Slavery Statement

for the financial year ended 30 June 2024

Which? takes a zero tolerance approach to slavery and human trafficking. Our modern slavery statement is issued in accordance with the Modern Slavery Act 2015. It sets out the steps we have taken in the year to 30 June 2024 to ensure that modern slavery and human trafficking do not take place in our organisation and to ensure that they do not take place in our supply chains. These steps taken are monitored on a regular basis.

## Our organisation's structure, business and supply chains

Which? is the trading name of the Consumers' Association and its wholly-owned subsidiary, Which? Limited. Which? Limited generates income for the Consumers' Association through subscriptions, partnerships and businesses whose products or services earn our endorsements and can, for a fee, use our name to promote them.

Which? is the UK's consumer champion. Based in the UK, we're a not for-profit organisation that makes life simpler, fairer and safer for UK consumers. We primarily operate within the areas of publishing, endorsements and the provision of consumer advice and guidance, including through our money and legal helplines. We consider the sectors that we operate in and our supply chains to be at a lower risk of modern slavery and human trafficking.

## Our policies in relation to slavery and human trafficking

### Procurement policy and procedures

Our internal policies require us to assess the risk profile of new suppliers and to put clear arrangements in place with them. Our Procurement team is responsible for implementing and managing procurement-related policy and procedure. Our zero tolerance approach is reflected within the standard contract terms that our suppliers agree to and our Supplier Code of Conduct, which encourages suppliers to apply the same standards across their supply chains.

### Internal people-management related policies

The Chief Financial Officer is our appointed individual responsible for overseeing the communication of the anti-slavery and anti-human trafficking message both within the organisation and within our supply chains. We communicate our zero-tolerance approach to our colleagues periodically and most recently did this in June 2024.

This statement is shared with colleagues and our Safeguarding and Whistleblowing policies make reference to modern slavery requirements. Which?'s Equity, Diversity and Inclusion strategy promotes a culture that embraces difference and makes everyone feel included and psychologically safe. Colleagues can raise concerns confidentially and anonymously if they wish through our independent and confidential whistleblowing process and through our quarterly employee engagement survey.

Which? is accredited by the Living Wage Foundation and is committed to paying everyone directly employed and working on our premises, whether permanent staff or contractors, a higher minimum rate of pay than the current National Living wage set by the government.

## Our supply chain due diligence

Geographically, our supply chains are predominantly based in the UK, although some suppliers also operate internationally. Where suppliers operate within industries and/or countries with a higher risk of slavery and human trafficking e.g. including industries such as printing, cleaning & maintenance, building security, these suppliers are subject to additional due diligence and monitoring procedures.

## Risk assessment and management

Since the UK's Modern Slavery Act came into force in October 2015, we have continued to undertake annual reviews to ensure we have appropriate procedures in place and are satisfied that we do. We believe that our exposure to modern slavery risks has not increased during the year, and furthermore note that no breaches of the Modern Slavery Act 2015 were reported during the financial year ended 30 June 2024.

In order to track the overall effectiveness of our measures to eradicate modern slavery in our business and supply chain, we continue to review the performance of a set of key performance indicators that were identified last year.

## Training about slavery and human trafficking

All employees are expected to complete Modern Slavery Act training when they join Which? and annually confirm their understanding of our whistleblowing arrangements.

\* This statement is made by the Consumers' Association on its own behalf and on behalf of Which? Limited, and was approved by the Which? Limited Board on 19 September 2024 and the Council of Trustees of the Consumers' Association on 24 September 2024.



Sam Younger  
Chair Council of Trustees  
September 2024