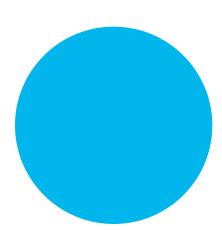


Modern slavery statement 2022/23

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Cancer Research UK's ("CRUK's") slavery and human trafficking statement for the financial year ending 31 March 2023. Of our wholly owned subsidiaries, this statement covers the activities of Cancer Research UK Trading Limited and Cancer Research Technology Limited.



Introduction



At Cancer Research UK, our vision is to bring about a world where everybody lives longer, better lives, free from the fear of cancer. We choose to be a responsible organisation in how we deliver this mission.

We remain committed to identifying, preventing and mitigating human rights issues in our operations and supply chains and we recognise modern slavery, particularly forced labour, as a key area of risk in our supply chains, both local and global.

In 2022/23 we have made significant progress, driven by the reinstatement of our modern slavery working group, who scoped and delivered the majority of our modern slavery 2022/23 objectives published in our last statement. These objectives included reviewing and improving our supplier due diligence methods and providing modern slavery training to staff.

We recognise the value of specialist knowledge to tackle modern slavery and the importance of collaboration. This year we formalised a

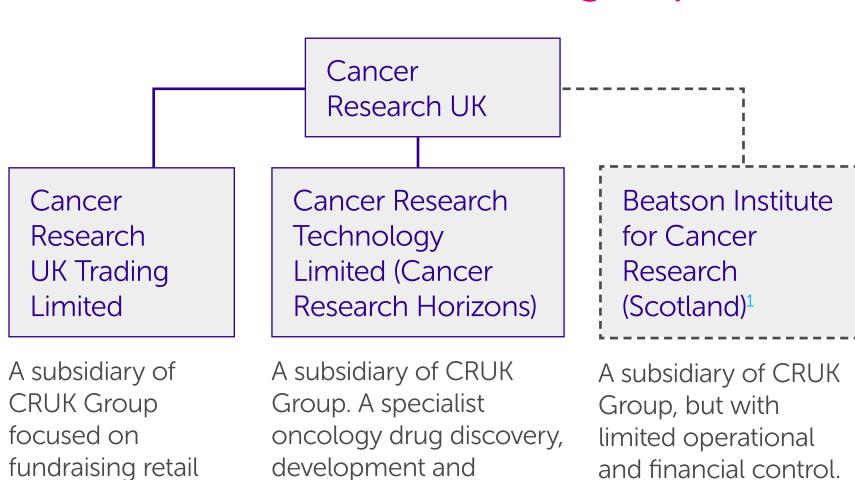
partnership with <u>Unseen</u>, a UK charity driving meaningful change by providing safehouses and support in the community for survivors of trafficking and modern slavery. Unseen run the UK Modern Slavery & Exploitation Helpline and work with individuals, communities, businesses, governments, other charities and statutory agencies to achieve their mission of stamping out slavery for good. In addition, we joined forces with The Reassurance Network to risk-assess and develop an ethical trade programme for suppliers of Cancer Research UK branded goods.

This statement covers our approach to identifying, mitigating and preventing modern slavery and provides a more detailed update on our progress in 2022/23. We will continue to focus on this issue and improve over the year ahead.

Michelle Mitchell OBE **Chief Executive**

Our operations structure and people

Cancer Research UK (CRUK) group structure



commercialisation

company.

activities.

Cancer Research UK is a registered Charity in England and Wales (1089464), Scotland (SC041666), the Isle of Man (1103) and Jersey (247). A company limited by guarantee. Registered company in England and Wales (4325234) and the Isle of Man (5713F). Registered address: 2 Redman Place, London, E20 1JQ.

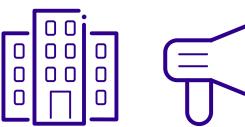
Our key activities²

Research - The world-class peer-reviewed research we fund in our labs and through awarding grant funding to the best researchers and institutes.

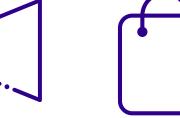
Operations - Activities which support the running of Cancer Research UK, such as Finance, IT and HR.

Fundraising - Activities other than retail which raise funds, such as events, corporate partnerships, and philanthropy.

Trading - Retail activities which raise funds, such as our 600+ stores, online site and marketplaces.







over 550



Stores 550 **Superstores** 31



Online shop Online marketplaces



Distribution centres

Offices



Laboratories

Over £400m spent on cancer research



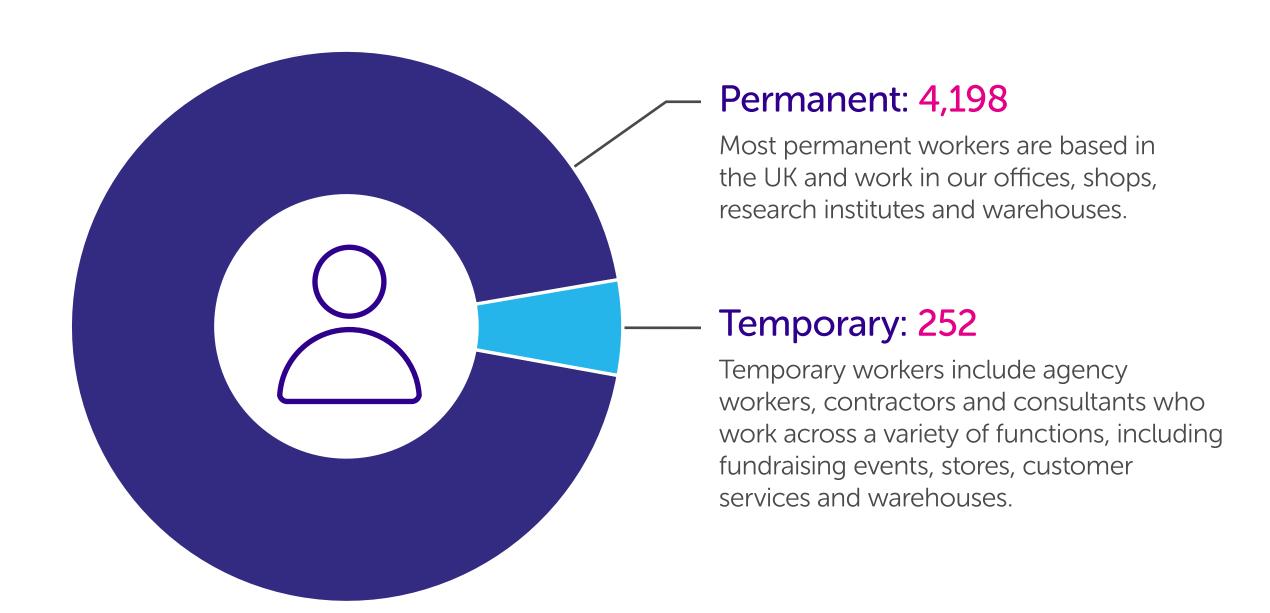
Over 19m people accessed our **About Cancer** website this year

- 1 Last year we said that we would explore how we can include activities in the future. We concluded that because they operate independently from CRUK, including the provision of goods and services, they will not be included moving forward. Beatson Institute is therefore excluded from this Modern Slavery Statement.
- 2 This reflects sites operated wholly by Cancer Research UK. Several of our sites are operated by third-party suppliers on our behalf (these are included in the supply chain structure) or shared spaces with other partners, for example, certain laboratories.

Our operations structure and people continued

Our people

In most cases, people are located remotely or in the sites wholly operated by CRUK noted above. However, some people may also be located on partner sites (for example, partner laboratories) or locations operated by third-party suppliers on our behalf.



Our supply chain structure^{3,4}

Cancer Research UK's provision of goods and services is essential to the day-to-day running of our Charity. In 2022/23 we had 1,795 suppliers.

At CRUK we break these down into several key supplier types based on what they provide:



- 3 Partners/suppliers who provide donated goods are excluded.
- 4 Supplier numbers are based on spend data 1 April 2022 to 31 March 2023.

Our operations structure and people

Suppliers can be broken down into

four key activity areas:



Operations – Goods and services procured to support our operations eg professional services, technology, recruitment agencies, fleet and travel.



Fundraising – Goods and services procured to support fundraising activities other than retail eg marketing agencies, marketing collateral, event consumables.



Trading – Goods and services procured to support our retail activities eg new goods to sell, warehousing and distribution.



Research – Goods and services procured to support the research we fund eg lab consumables.

Whilst our direct relationship is with the provider of the finished good or service, there could be multiple entities involved along the supply chain referred to as supply chain 'tiers'.

Within this statement, we will refer to the first two tiers of a goods-specific supply chain.

Tier 1 (Supplier) – The organisation that we have a direct business relationship with, providing finished goods that have been sourced from the manufacturers in their supply chain.

Tier 2 (Site) – The site the supplier purchases the goods from. This is often the manufacturer (factory) of the finished good.

Our governance and partnerships

We set several objectives relating to governance and partnerships in our 2021/22 statement:

2022/23 objectives

We will:

- review the resources we commit to sustainability, whilst continuing to develop and refine our sustainability strategy and the governance structure and process
- reinstate a modern slavery working group to oversee the implementation of our modern slavery identification, mitigation and prevention programme
- engage with a specialist modern slavery partner or multi-stakeholder initiative to act as a critical friend

Governance

Cancer Research UK is a company limited by guarantee and is a registered Charity. We're governed by a Council of Trustees who set the Charity's strategic direction, monitor the delivery of our objectives to uphold our values and governance, and guide, advise and support the Chief Executive who leads the Senior Management team. There are six committees of Council. The day-to-day running of the Charity is the responsibility of the Executive Board.

Our approach to being a responsible organisation, including human rights, is governed by our Executive Board. The Executive Board is supported by a Sustainability and Environmental, Social and Governance (ESG) Reporting Steering Group and a team of sustainability specialists. Various departments, such as Trading and Procurement, are responsible for implementing processes that support us in achieving our responsible organisation objectives and obligations, including those concerning human rights. The trading department recently appointed a Sustainability Executive to support with such processes. We set up two working groups in 2022/23 to support cross-departmental collaboration, including a Modern Slavery Working Group and Responsible Sourcing Working Group. We also have a Sustainability Network made up of people from across the Charity,

who volunteer their time to drive awareness and engagement on sustainability initiatives.

Our Council of Trustees is ultimately accountable for how we are a responsible organisation and our sustainability strategy, including human rights. Our Trustees are involved in key strategic decision-making and policy. Our approach to addressing modern slavery is reported to our Council of Trustees through the Audit Committee.



Our governance and partnerships continued

• Unseen is delighted to be partnering with Cancer Research UK. Our partnership will be key in raising awareness of modern slavery and exploitation across the organisation, which began in 2022/23 through tailored training and a collaborative workshop. Over the course of our partnership Unseen will be supporting the development of Cancer Research UK's modern slavery strategy, including advising on their modern slavery statement and key policies. Our strong collaboration will also ensure Cancer Research UK relates to other likeminded organisations to encourage and promote best practice.



Partnerships

In 2022/23 we established two important partnerships to enable and support us to further tackle modern slavery.

Unseen

We formed a partnership with Unseen, a UK charity driving meaningful change by providing safehouses and support in the community for survivors of trafficking and modern slavery. Unseen run the UK Modern Slavery & Exploitation Helpline and work with individuals, communities, businesses, governments, other charities and statutory agencies to achieve their mission of stamping out slavery for good. Unseen has delivered a successful training session for key CRUK employees and in 2023/24, they will focus on conducting a gap analysis of our approach to tackling modern slavery and provide recommendations for improvement.

The Reassurance Network

In 2022/23 we partnered with The Reassurance Network (TRN) to map, risk-assess and scope an ongoing ethical trade programme for tier 1 and tier 2 suppliers of CRUK branded goods. With 49 ethical trade specialists located in over 20 countries, TRN

bring the insight and knowledge to drive meaningful positive change in our supply chain and are a vital extension of our team.

We are delighted to be partnering with CRUK to help them achieve the goals set out in this Modern Slavery Statement. The Reassurance Network began providing CRUK with human rights supply chain due diligence support in 2022. We worked closely with CRUK to map and conduct desk-based risk assessments of the first tiers of their branded goods suppliers. Over the next 12 months, we will visit certain sites to undertake comprehensive audits of working conditions and engage in long-term supplier remediation and improvement programmes where required and appropriate.

With support from our team, the work CRUK plans to undertake over the next year will contribute to improved supply chain transparency and working conditions, as well as strengthened supplier relationships.



Our approach

This section details our current approach (including action taken in 2022/23) to identify, prevent and mitigate modern slavery in our operations and supply chain. We have broken this down into the following sections:

- Policies
- Due diligence including risk assessment
- Escalation and remediation
- Training and communication

The objectives we set in our 2021/22 statement to deliver in 2022/23 are shown for reference.

1. Policies

2022/23 objectives

We will:

- implement an organisation-wide code of conduct, which will articulate the standards of conduct we expect from our employees and everyone that works with us, including our suppliers and partners
- implement an annual review process of our Supplier Code of Conduct to ensure it remains accurate and reflects our current expectations of suppliers

Our policies set out the minimum standards we expect within Cancer Research UK and from those we work with on modern slavery.

People in our operations

Our policies are hosted on an internal learning platform and are signposted within learning modules which remain mandatory for all new starters:

- Safeguarding Policy this sets out our approach to safeguarding and the actions that staff are required to take in dealing with safeguarding concerns.
- Dignity at Work Policy this sets out our position on bullying and harassment and covers all those who work for us including employees, secondees, contractors, agencies, fixed-term and temporary workers, to ensure everyone is supported and safe.
- Equality, Diversity and Inclusion Policy this sets out our commitment to building a diverse, equal and inclusive environment for all our employees and volunteers through our employment and people practices.
- Whistleblowing Policy this encourages staff, volunteers and contractors to report concerns including any related to modern slavery, trafficking and child or forced labour.
- Code of Conduct we've drafted a Code of Conduct which will be published in 2023. This is slightly later than originally planned due to competing priorities.

People in our supply chain

- Working with Suppliers and Partners Policy this sets out internal requirements for buying goods and services to ensure risks are managed appropriately.
- Supplier Code of Conduct this sets out our standards and the standards expected of our suppliers in relation to the responsible, sustainable and ethical sourcing of goods and services. New suppliers are asked to confirm agreement to this at the point of onboarding and it is underwritten within the terms and conditions of certain supplier contract templates. The Supplier Code of Conduct was reviewed and updated in 2022/23 and further detail can be found later in the statement.

2. Due diligence

2022/23 objectives

We will:

• carry out a review of current due diligence processes and recommendations from a modern slavery internal audit conducted in 2019/20

Definition of due diligence (for the purpose of this statement): taking action to identify, prevent and mitigate actual and potential adverse human rights impacts in our operations and supply chain.

People in our operations

Permanent employees are at low risk of modern slavery as we have thorough onboarding and monitoring processes overseen by our Human Resources team, such as the right to work and identification checks. Temporary employees can either be directly employed, in which case they go through similar processes to permanent employees, or they are employed through third-parties such as recruitment agencies. Members of this latter group fall within our supply chain risk assessment and due diligence approach.

People in our supply chain

An in-depth review of our supplier due diligence process took place in 2022/23. The following section details the process as it currently is following the review, and the actions taken to improve so far.

Our Supplier Code of Conduct includes the prohibition of modern slavery. We recognise that most risk sits in our supply chain and so take responsibility for undertaking further due diligence to identify, prevent and mitigate breaches of the Supplier Code of Conduct (which includes modern slavery) beyond stipulating it in policy.

CRUK's supply chain is large and global. It's therefore important that we prioritise efforts through robust risk assessment.

	Risk indicators	Cancer Research UK supplier risk
Goods	Goods supplier categories are prioritised based on three key risk indicators: 1. Influence 2. Accountability	 High: CRUK branded goods – goods we sell and use which are CRUK branded. Medium: third-party goods – goods we sell but are not CRUK branded.
	3. Reputation	Low: consumables – goods we use but do not sell and are not CRUK branded.
		All suppliers are allocated a procurement category based on the services they provide.
Services	Services supplier categories are prioritised based on two key risk indicators:	66 out of 361 (18%) of CRUK's procurement sector categories are identified as high-risk based on inherent sector-based social and environment risk.
	 Inherent sector-based social risk Inherent sector-based environment risk 	 High: services suppliers allocated one of the high- risk procurement categories.
		Low: services suppliers not allocated one of the high-risk procurement categories.

For high and medium-risk supplier's due diligence taken can include, but is not limited to, conversations, interviews, surveys and on-site audits. This takes place at key points during a suppliers' relationship with CRUK:

Goods – CRUK branded goods

High risk

The due diligence process of this supplier category was reviewed in depth in 2022/23.

A three-month programme with a specialist partner The Reassurance Network saw us map and risk-assess suppliers (tier 1) and sites (tier 2) of CRUK branded goods.

Following this, we developed an updated ethical trade programme which will be rolled out in 2023/24. The focus will be on reducing high-risk sites through remediation, where possible and appropriate.

	Goods – Third-party products we sell	Services/High-risk procurement categories	
	Medium risk	High risk	
Pre-onboarding	If a contract or tender is put in place before the supplier is set up on CRUK's systems, the onboarding process happens in advance at the pre-onboarding stage.		
	These supplier categories are automatically flagged on the new supplier set-up system to the Sustainability Programme Manager, who must approve before set-up can progress.		
Onboarding	Approval involves sending the relevant sustainability questionnaire to the supplier, which must be completed and returned. Upon review of the completed questionnaire, if there are any critical or high risks identified — the Sustainability Programme Manager liaises with the internal requester to discuss and, if possible/appropriate, resolve before approval. If not resolved, the supplier will not be set up.		
Post approval	Ad hoc due diligence is undertaken post approval with key suppliers, for example at contract renewal stage Post-approval supplier due diligence will be an area of future focus.		

This section breaks down in more detail the in-depth review of our supplier due diligence process that took place in 2022/23 to achieve the above refreshed process.

This review was in collaboration with a core project group and in consultation with the wider Responsible Sourcing Working Group and Modern Slavery Working Group members.

Step	2022/23
	The current and historic supplier due diligence process was mapped in detail and recorded. In collaboration with a specialist consultant, this process was reviewed referencing peer processes, industry best practice, internationally recognised frameworks and the internal 2019/20 modern slavery audit report recommendations.
Map historic process	 Key findings: Process in place, but not documented or understood by the majority of CRUK staff. Methodologies require updating and refreshing. Several opportunities for improving the process for accuracy, effectiveness, and efficiency. Lack of clarity on what is a 'must' (red line) or a 'should' for internal purchasers and suppliers.
Addressing the key findings in step 1 and in consultation with the Responsible Sourcing Working Group, we created a Responsible Sourcing Guidelines. This outlines the 'musts' and 'shoulds' across the breadth of Responsible and includes an updated supplier due diligence framework.	

Step	2022/23
Roll-out future process	The Responsible Sourcing Guidelines are the 'what'. The 'how' was interdependent on multiple ongoing processes and projects across the organisation. An implementation plan was designed taking each 'must' one by one and assigning leads and deadlines across the Responsible Sourcing Working Group. Several key examples are pulled out for reference below.

Supplier Code of Conduct

In 2022/23 the Supplier Code of Conduct was reviewed, and improvements were made which included:

- ensuring content and wording aligned with internationally recognised frameworks
- carrying out a gap analysis and including relevant topics not previously included

Update of the procurement category risk matrix

In 2022/23 the procurement risk matrix was reviewed by an external consultant. This involved reviewing 361 procurement services categories and assigning a risk level of high or low against social and environment considerations. We recorded reasoning and sources to facilitate more regular review moving forward. This matrix determines which services suppliers at pre-onboarding and onboarding stage are required to complete further due diligence.

Review of risk and prioritisation of our operations and supply chain

In 2022/23 a risk assessment exercise was carried out by the Modern Slavery Working Group and a specialist external consultant, to support the prioritisation of supplier due diligence and internal stakeholder training. This involved:

- mapping high-risk industries (referencing sources such as the Gangmasters and Labour Abuse Authority (GLAA)) against key internal activity areas
- identifying the key risks within these activity areas
- identifying inherent risk (pre-existing controls) and current risk (after existing controls)
- agreeing risk appetite
- agreeing improvement areas

Update of the due diligence methods for high-risk suppliers

Due diligence methods for high-risk suppliers were reviewed and two key activities agreed:

Update the supplier questionnaire for high-risk services suppliers (social and environment) and suppliers of third-party goods we sell.

We developed a sustainability questionnaire, designed to be easily completed by suppliers. The questionnaire identifies critical, high, medium or low risks. It is focused on seeking confirmation that legal requirements are being adhered to and sufficient management systems are in place to support the upholding of the requirements of our Supplier Code of Conduct along the supply chain. The sustainability programme manager and specialist consultant led this piece of work, building a robust reviewer instructions document to sit alongside the questionnaire. Any critical or high risks identified must be resolved before onboarding a new supplier.

Map and risk-assess suppliers of CRUK branded goods and develop an improved ongoing ethical trade programme.

We appointed The Reassurance Network to work alongside a core internal project group to map and risk-assess suppliers (tier 1) and sites (tier 2) of CRUK branded goods. Tier 1 suppliers were graded based on completion of the previously mentioned sustainability questionnaire, which required suppliers to declare factory details of those producing CRUK branded goods. Factories were then asked to complete a questionnaire and share existing social audit information. Factories were graded using an agreed matrix on a scale from low to critical and specialists operating within the location regions of the factories led on the grading exercise.

Following the risk assessment exercise which graded suppliers and factories and identified key risks, we built an updated and improved ethical trade programme. This new programme focuses on reducing high-risk factories in a productive and credible way and will be rolled out in 2023/24.

3. Escalation and remediation

2022/23 objectives

We will:

 review human rights, including modern slavery, within the organisation's risk management and escalation process, including reviewing the escalation process for actual or suspected modern slavery incidents with the aim of finalising and implementing a new process

CRUK has a Business Continuity and Incident Response framework which includes an incident triage and response team mobilisation. The framework is sufficient for raising incidents of modern slavery within CRUK. One amendment was to include the Modern Slavery Working Group as part of the potential response team.

We discussed the routes through which an issue could come to light, and it was felt that in all cases a member of the Modern Slavery Working Group would most likely be the first contact (eg risk manager if raised via the internal whistleblowing line, sustainability programme manager if found during the ethical trade programme of CRUK branded goods).

This further reinforced that the Business Continuity and Incident Response framework, with the previously mentioned amendment, remains appropriate.

We appointed Unseen as a partner who would play a key role in remediation if a case of modern slavery was to occur in our operations or supply chain. Unseen brings the specialist knowledge needed to ensure victims are kept the primary focus throughout any remediation.

4. Training and communication

2022/23 objectives

We will:

• develop a formal assessment of our training and awareness needs and a documented training and awareness plan to address these

This year we conducted a review of risk of our operations and supply chain to support the prioritisation of supplier due diligence and internal stakeholder training. It identifed three key training and communication opportunities:

What: General awareness-raising training Audience: All CRUK employees

Content included:

- What is modern slavery
- CRUK's approach to addressing modern slavery
- How to spot the signs and speak up
- What: Targeted training with our specialist partner

Audience: Stakeholders identified during the risk assessment exercise as more likely to be in contact with high-risk people or suppliers

Ths included the Modern Slavergy Working Group members along with additional relevant stakeholders from the following departments:

- Property
- Trading
- Procurement
- What: Raise further awareness of CRUK helpline and Unseen helpline to raise concerns

Audience: Subcontractors working in our offices, customers in our stores

Points 1 and 2 were delivered in 2022/23:

General awareness-raising training

In 2022/23 we launched a Modern Slavery Awareness training deck on the Sustainability Network SharePoint. It was signposted through an all-staff internal comms email which can be accessed by the majority of CRUK staff. It is a guided learning deck for any employee to hold an interactive session with their wider team to raise awareness of and discuss – what modern slavery is, CRUK's approach and how to spot the signs and speak up. The Sustainability Network members were encouraged to hold sessions with their team in the first instance.

Targeted training with specialist partner Unseen

A two-hour session was held with key stakeholders across CRUK who were identified as more likely to be in contact with high-risk people or suppliers.

The first half was led by Unseen and focused on what modern slavery is, what the risks are across the business landscape, identifying CRUK's risk, and sharing best practice and improvement for tackling modern slavery. The second half was an interactive session reflecting on progress in 2022/23 and planning focuses for 2023/24.

Monitoring our effectiveness

Indicators	2021/22	2022/23
Percentage of new starters who completed mandatory online learning modules	77%	78%
Percentage of high-risk CRUK branded goods sites (tier 2)	N/A	50%
Percentage of calls to the whistleblowing line related to modern slavery	0%	0%

In this table, there are several key performance indicators (KPIs) used to measure the success of our approach to identifying, mitigating and preventing modern slavery in our own operations and supply chains.

In 2021/22 we committed to reviewing the KPIs and supporting methodology. We made one key change, amending the KPI of supplier due diligence to reflect the previously outlined changes to approach undertaken in 2022/23. The updated KPI focuses on tracking the aim of reducing risk in the tier 2 sites of CRUK branded goods.

Our approach to addressing the risk of modern slavery was internally audited in 2019/20 and from this, we agreed several recommendations and actions to work on across the Charity. In 2020/21 we stated that due to the organisational impacts of COVID-19, we were still to meet some of our ambitions. In 2022/23 we have reviewed, addressed, and closed all but one outstanding action which is due to be completed within Q1 of 2023/24.

Next steps Governance and partnerships

We know there is much more we can and must do to identify, prevent and mitigate modern slavery occurring in our operations and supply chains. We will therefore continue to add to our efforts in 2023/24. An initial outline of focuses is below:

Area	Planned 2023/24 action	Outcome
Governance	We will revisit the structure and purpose of the Modern Slavery Working Group and individual member responsibility.	Taken the time to reflect on the first full year post the relaunch of this working group, to ensure we are working as efficiently and effectively as possible.
Partnerships	 We will begin the programme of work with our newly appointed modern slavery partner Unseen. This will include the following: Gap analysis – includes initial consultation, review of organisational approach, review of all relevant organisational policies, review meeting and proposals for next steps. Review of annual Modern Slavery Statement – feedback on the Modern Slavery Statement will take into account the legal requirements of such a statement, the level of detail included and feedback on suggested areas for improvement. 	Clear and robust improvement opportunities identified, to guide our approach over the next three years.

Next steps Our approach

Area	Planned 2023/24 action	Outcome
Policy	We will create a Modern Slavery Statement mandatory requirement document.	Have a point of reference for the Modern Slavery Working Group, detailing the internal approach to identifying, preventing and mitigating modern slavery.
	We will review the Supplier Code of Conduct in line with the annual review process.	Ensure the Supplier Code of Conduct remains in line with internationally recognised frameworks and industry best practices.

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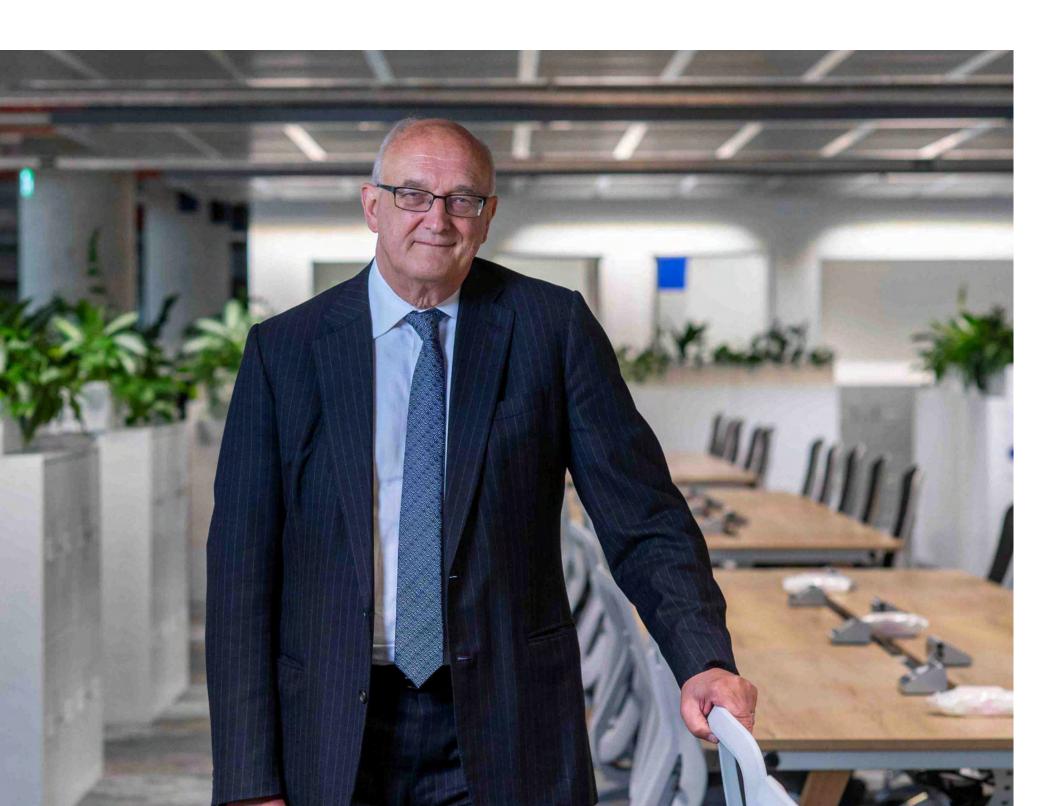
Next steps Our approach continued

Area	Planned 2023/24 action	Outcome
	We will conduct due diligence over a select number of existing strategic services suppliers in high-risk procurement categories, and consider the potential of rolling out an ongoing due diligence programme.	Engage strategic suppliers in a conversation concerning our sustainability expectations in line with the supplier code of conduct, identify any risk and work on continuous improvement.
Due diligence and risk assessment and management	 We will roll out our CRUK branded goods ethical trade programme, to include: Launching an organisation-wide controlled approach to ordering CRUK branded goods. This will ensure we're only purchasing from a consolidated list which is part of the ethical trade programme. Conduct on-site audits of most high-risk tier 2 factories to clarify issues and work on remediation. 	Increase the transparency and control of our highest-risk supply chain and where appropriate, through collaboration and remediation, reduce the number of high-risk factories producing CRUK branded goods.
	We will create a reporting template and establish a reporting cadence to update senior leadership on the progress of the ethical trade programme.	Raise awareness and prompt discussion internally of risk and progress.

Next steps Our approach continued

Area	Planned 2023/24 action	Outcome
Training and	We will explore the feasibility and effectiveness of launching a wider and more regular training programme for CRUK staff in areas of the organisation where they are more likely to be in contact with high-risk people or suppliers.	Increase awareness of and engagement in identifying, preventing and mitigating modern slavery across our operations and supply chains.
Training and comms We will look at bespoke communication channels for CRUK shop staff and volunteers to raise awareness and provide the relevant training in the most effective and robust way.	Create opportunities to reach those with limited access to the general learning platforms. Focus of awareness will be what modern slavery is and how to spot the signs of modern slavery and speak up.	

Approval



This statement has been formally approved by the Trustees of Cancer Research UK and signed on their behalf.

Professor Sir Leszek Borysiewicz Chair, Cancer Research UK

20 July 2023