

# Anti-Slavery and Human Trafficking Statement

## (Modern Slavery Act 2015)

### Introduction

Whistl UK Limited is committed to improving our practices to combat slavery and human trafficking by helping protect the most vulnerable and to prevent the violation of human rights.

### Our Business and Company Structure

Whistl are a delivery management company providing efficient, high-quality and competitively priced services across Business Mail, Parcels, Fulfilment and Doordrop Media both in the UK and internationally.

The business is owned by management with a minority shareholding held by PostNL and we have 1,950 employees across sites in Glasgow, Gateshead, Bolton, Nottingham, Rugby, Bristol, Belfast, Bedford, Rushden, Farnborough and our head office in Marlow.

### Our Policies on Slavery and Human Trafficking

Whistl UK Limited is committed to ensuring that there is no modern slavery or human trafficking practices within our business or our supply chain. Our Anti-Slavery and Human Trafficking Policy reflects our responsibility to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chain.

### Due diligence processes for Slavery and Human Trafficking

#### 1. Verification

We regularly undertake appropriate checks in respect our employees and contract workers through CRB checks, referencing and also validation of personal information. We verify the information supplied by carrying out regular audits.

In 2019 we will continue to work with our suppliers to ensure they also maintain a high standard of verification setting out clear expectations of checks and verifications to be completed at every level.

#### 2. Audits

We carry out regular audits in relation to our employees, contract workers and suppliers in order to evaluate any potential breaches. Audit standards are regularly reviewed to ensure that they remain fit for purpose and are compliant.

In 2018 our internal audits reviewed the procedures for undertaking checks in respect of employees and contract workers within our own HR team and with our key labour supplier in our mail sortation depots, transport teams and fulfilment centres. Recommendations for continuous improvement identified based on best practice have been shared and implemented across all labour providers.

In 2019 we will continue to incorporate anti-slavery and human trafficking into audits across key suppliers across our business.

### **3. Certification**

Our business works with our suppliers to certify that they comply with the laws regarding slavery and human trafficking in the country or countries in which they do business.

Throughout 2018 and as a matter of course going forward any supplier who submits an expression of interest to tender or re-tender as a supplier to our business, is issued with an anti-slavery and human trafficking questionnaire. The responses provided are reviewed as a part of annual contract reviews, assessment of proposals and as part of tender decision making.

### **4. Internal Accountability**

We ensure that our employee and contract workers are appropriately notified and communicated to in respect of Whistl's standards and procedures and the implications of failure to comply with the standards regarding slavery and trafficking.

### **5. Training**

All Whistl employees and management who have direct responsibility for supply chain management are provided with the appropriate training on human trafficking and slavery, particularly with respect to mitigating risk within our supply chains.

Awareness training on modern slavery and human trafficking is a part of compliance training for all staff. Completion of this training is required as a part of induction into a new role and through annual refresher training across the business. In 2018, Modern Slavery also featured as a key topic in one of our monthly "Tool box" briefings with staff.

Additional briefings and support materials are available to key staff involved in recruitment, on-boarding, line management and supplier relationship management to ensure appropriate knowledge and skills are available to identify, report and address any areas of concern.

In 2019 we will be revising and refreshing the training support and resources available for recruiting managers and building in new content drawn from best practice from the "Stronger Together" initiative that one of our new key recruitment suppliers in our sortation depots has shared with us.

### **Supplier compliance to our Values and Ethics**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, we have in place Corporate Social Responsibility Standards. Our compliance team consists of:

- Legal
- Audit and Compliance
- Human Resources
- Procurement
- Security

### Key Performance Indicators

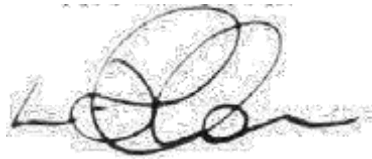
Throughout 2018 and ongoing into 2019 we will continue to review and audit all supply chains on an annual basis or as and when renewals/re-tenders are due (whichever is sooner) to ensure their compliance to the Modern Slavery Act 2015.

*This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2019.*

Name of Director: Lynn Dillon

Signatory Title: HR Director

Signature of Director:

A handwritten signature in black ink, appearing to read 'Lynn Dillon', is written over a faint, dotted rectangular box.

Date: 29 March 2019