

Anti-Slavery and Human Trafficking Statement (Modern Slavery Act 2015)

Introduction

Whistl 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.

This statement has been published in accordance with the Modern Slavery Act 2015 and relates to our financial year 1 January to 31 December 2020. It sets out the steps taken by Whistl to understand all potential modern slavery risks to our business and put in place measures to ensure that there is no slavery or human trafficking in our own business or in our supply chains.

Our Business and Company Structure

Whistl is the delivery management partner of choice for online retailers and brands providing efficient, high-quality, competitively priced integrated mail and parcel delivery, fulfilment, contact centre and advertising solutions. Headquartered in Marlow, we provide UK-wide and international delivery services.

The business is owned by management with minority shareholdings held by PostNL and the Business Growth Fund (BGF). We have around 2,277 employees across sites in Glasgow, Bolton, Bedford, Bristol, Belfast, Rushden, Farnborough, Nottingham, Gateshead, Heathrow, Paignton, Wrangaton, Lutterworth and Northampton as well as in our head office in Marlow.

For the purpose of this statement we use the terms “Whistl” and “Group” to encompass the activities of following companies:

- Whistl UK Limited
- Whistl (Doordrop Media) Limited
- Whistl Fulfilment (Farnborough) Limited
- Whistl Fulfilment (Rushden) Limited
- Parcelhub Limited
- Whistl Fulfilment (Gateshead) Limited
- Spark Etail Limited
- Clientbase Fulfilment Limited (acquired in August 2020)

Our Policies on Slavery and Human Trafficking

Whistl is committed to ensuring that there is no modern slavery or human trafficking practices within our business or in our supply chain. Our Anti-Slavery and Human Trafficking Policy reflects our commitment 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.

This policy works in conjunction with a range of other relevant policies and procedures that set out steps to be taken to support the identification and steps to prevent slavery and human trafficking in the business. All our policies are reviewed and updated on an annual basis and

are freely available to staff through our internal intranet and to suppliers on our Supplier Portal.

During 2020 we have continued to undertake a review of related policies and procedures for example to ensure there is explicit reference to our expectations of all workers with respect to any risk of Slavery or Human Trafficking that they may become aware of internally or within our supply chain. This includes our Whistleblowing Policy & Procedure; Conduct and Capability Disciplinary Policy and Procedure; Anti-Harassment and Bullying Policy and Procedure; and, Recruitment Policy & Procedure.

In 2021 we will continue to review and update our policies and procedures to raise greater awareness of how Modern Slavery and Human Trafficking impacts our business.

Due diligence processes for Slavery and Human Trafficking

Our Workforce – Verification

We regularly undertake appropriate checks in respect our employees and contract workers through CRB checks, referencing and also validation of personal information. We further verify the information supplied to us, by carrying out regular audits. Any issues identified in relation to data provided by employees, for instance shared addresses, bank accounts and/or other risk factors, are investigated. In 2020 no areas of concern were identified following the investigation of flags raised through these checks.

In 2020 we continued 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. Furthermore, we have reviewed our Service Level Agreements with recruitment suppliers to ensure they accurately reflect updates and changes to our own Anti-Slavery and Human Trafficking policy over the last 12 months.

Audits

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

Throughout 2020 we have continued to incorporate anti-slavery and human trafficking into audits across key suppliers of facility management, recruitment and uniforms across our business. No issues have been highlighted as a result of these audits.

This practice of regular audit and review will continue in 2021

Supply Chain Compliance

Our business regularly assess the risk levels within our supply chain and works with them to certify that they comply with the laws regarding slavery and human trafficking in the country or countries in which they do business.

Since 2017 we have developed, implemented and refined our procurement process to ensure:

- On invitation to respond to a Request for Proposal (RFP), any potential suppliers are required to confirm that they have read and can comply with the terms of our Anti-Slavery and Human Trafficking Statement, Policies and Procedures.
- That our terms of business clearly set out supplier obligations in relation to Modern Slavery both for their own business and their supply chain.
- At the outset of any contract, and on an annual basis afterwards, all suppliers in areas of identified risk are issued with, and required to complete, a Modern Slavery

Questionnaire verifying that they have appropriate processes, policies and procedures in place to assure compliance with anti-slavery and human trafficking laws.

At each stage of the procurement process any supplier who is unable to verify compliance is disqualified from the process.

In 2020, no significant risk of non-compliance was identified amongst our current suppliers. Where we have identified potential for improvement we have highlighted these to individual suppliers as recommendations for their consideration.

In 2016 we undertook a risk assessment of our supply chain. Due to the nature of our business and the areas in which we, and our supply chains operate, the levels of risk were considered low. Since then we have expanded our business through acquisition and in doing so we have re-assessed the level of risk at every stage. In 2021 we will review our supply chain risk assessment practices further to ensure that they are still in line with best practice and guidance in relation to Modern Slavery.

Training

Since 2016 all staff have been required to complete mandatory compliance training on induction, and then on an annual basis. The training includes a module on modern slavery and human trafficking. We have in place a key performance indicator that requires no less than 85% of our workforce to have successfully completed this compliance training at any point in time.

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

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 made a commitment to test the processes and training we have in place through a series of dry run scenarios within our own operation and that of our supply chain. Due to the impact of Covid during 2020 these dry run scenarios were delayed and are now planned for 2022. A review of the results of these will form any improvements to our policy, processes and training for 2022.

In 2020 we committed to working to increase further employee awareness of our organisations' response to Human Trafficking and Modern Slavery including by publishing details of our Modern Slavery compliance group, providing a focus around key dates in the year on our intranet and through on-site briefings. This will be in place for Q2 of 2021.

Internal Accountability

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

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

That team meets together at least twice a year to review progress and identify any areas of continuous improvement. In 2019 our participation in the Home Office Government Supplier Framework process proved helpful in identifying areas of continuous improvement for 2020.

We have developed a new “Supplier Code of Conduct” that draws together the operating standards and ethical expectations to be met by any supplier that work with us into one document. The Code of Conduct includes a supplier’s obligations in relation to eliminating modern slavery and will be provided to all suppliers as part of any formal tender or contract renewal process as well as being available to all current suppliers through our supplier portal. This will be signed off and rolled out in 2021.

Key Performance Indicators

Since 2016 we have reviewed our existing supply chains to ensure their compliance with the Modern Slavery Act 2015. This has been undertaken through the issue, return and assessment of information from suppliers in response to our Anti-Slavery and Human Trafficking questionnaires both at award of any contract and on an annual basis.

We are introducing a set of Key Performance Indicators that will be measured by Whistl and which will help inform audits with suppliers. These will include measures around:

- Anti Slavery and Human Trafficking Training - Completion and successful assessment of learning as a percentage of the workforce.
- Verification Checks – Number of potential risks identified through checks, resolution times and outcomes.
- Whistleblowing Reports – Time taken to act investigate and resolve any risks identified.
- Supplier Audits – Issues of non-compliance highlighted and response time to resolve

The results of the Key Performance Indicators will also be reported to the Executive Board of Whistl on a quarterly basis.

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 2020

Name of Director: Lynn Dillon

Signatory Title: HR Director

Signature of Director:



Date: 1 June 2021