

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

Introduction

Whistl Group Ltd 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 Group Ltd, formerly known as TNT Post, is the second largest UK postal company and provides Mail, Packets and Parcels, Doordrop Media, Fulfilment and Logistics services. Headquartered in Marlow, we provide UK wide delivery services as well as international.

The business is owned by management with a minority shareholding held by PostNL and we have 1,750 employees across 10 sites in Glasgow, Bolton, Rugby, Bristol, Iver, Belfast, Rushden, Farnborough, Nottingham and our head office in Marlow.

Our Policies on Slavery and Human Trafficking

Whistl Group Ltd 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.

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 2017 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. Recommendations for continuous improvement identified in both audits, based on best practice have been shared and implemented.

In 2018 we will continue to incorporate anti-slavery and human trafficking into audits across key suppliers of facility management, recruitment and uniforms 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.

In 2017 we issued an anti-slavery and human trafficking questionnaire to all suppliers seeking verification of the processes and policies in place to assure compliance to the laws regarding anti-slavery and human trafficking. No significant risk of non-compliance has been identified. Where we have identified potential for improvement we have highlighted these to individual suppliers as recommendations for their consideration.

In addition to where a supplier has submitted an expression of interest to tender or re-tender as a supplier to our business, the anti-slavery and human trafficking questionnaire will be issued to all suppliers on an annual basis. Responses provided will be 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 Group Ltd standards and procedures and the implications of failure to comply with the standards regarding slavery and trafficking.

5. Training

All Whistl Group Ltd 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.

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

In 2018 we will be testing the processes and training we have in place through a series of dry run scenarios with potential areas of concern within our own operation and that of our supply chain. A review of the results of these dry runs will inform any improvements to our policy, processes and training.

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

In 2017 we committed to review our existing supply chains by the end of the financial year, to ensure their compliance to the Modern Slavery Act 2015. This has been undertaken through the issue, return and assessment of information provided by the Anti-Slavery and Human Trafficking supplier questionnaires.

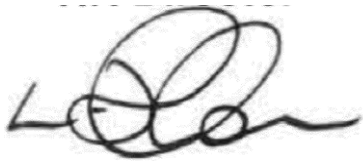
In 2018 we will continue to review and audit all supply chains on an annual basis or as and when renewals/re-tenders are due (whichever is sooner) to ensure their compliance to the Modern Slaver Act 2015.

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 2018.

Name of Director: Lynn Dillon

Signatory Title: HR Director

Signature of Director:

A handwritten signature in black ink, appearing to be "Lynn Dillon", written over a dashed horizontal line.

Date: 11th October 2018