



MODERN SLAVERY STATEMENT

2018/2019





With this third publication of our Anti Slavery and Human Trafficking Statement, we continue with our quest to combat modern slavery within our organisation and the supply chains we impact. Under our first and second Modern Slavery Statements, we made good progress against our commitments and targets.

wnDirect has during 2018 relaunched its Code of Conduct and Business Ethics Framework that incorporates Anti Competition, Anti Bribery and Corruption, Anti Money Laundering, Data Protection and Security, Procurement, Environment, Anti Modern Slavery, Human Rights, Equal Opportunities and Bullying and Harassment– all behaviours which contribute to a business environment that is unjust and unfair and represent an environment where Modern Slavery practices can find traction. Our whistleblowing procedures have been widened to include another reporting tool to a higher division in wnDirect’s parent group and during 2019 it is wnDirect’s intention to open up every available wnDirect whistleblowing tool to our entire supply base to encourage the workforce of our suppliers to raise with us (on an anonymous basis if preferred) any issues that they believe run against the behaviours set out in this Framework, so that wnDirect can investigate reported issues and apply our business influence to correct any undesired behaviours that are uncovered. For example in jurisdictions where legislation to protect against issues of Modern Slavery is not yet in place or where workers are not given the opportunities

to anonymously report unsavoury business practices and may be afraid for their job security, we want to give these workers an opportunity to still make a difference by reporting the matter to us.

Our Code of Conduct and Business Ethics Framework has been ratified by the wnDirect Board, our workers have signed up to confirm their understanding of the required behaviours and their agreement to abide by its requirements and during this coming year, our workers will also undergo interactive training on its contents. By ensuring our workforce have an in-depth understanding of the required behaviours needed to identify and eradicate unjust or unfair behaviours, our business will be better equipped to identify and uncover any potential issues that might be occurring in our supply chain, whether they relate to Modern Slavery or any other unjust practice. To that end, we have continued to provide annual in-house training and communications to the wnDirect workforce to ensure that their awareness of Modern Slavery is always heightened and at the forefront of their minds so that they are more able to identify it and more likely to report it.

BUSINESS AND SUPPLY CHAINS A REVIEW FOR 2018

wnDirect are eCommerce global delivery experts providing managed logistics solutions which overcome the challenges of international expansion and growth for retailers around the world. Our 'direct supply chain' therefore consists of our valued eCommerce retailer clients and our trusted business partners: collection, sortation and freight forwarding partners in the UK, and customs clearance and delivery partners in several international jurisdictions.

In addition to the actions mentioned above, we have during 2018 implemented the following additional measures to continue to identify and work to eliminate modern slavery practices in our direct supply chain:

- An examination of our supply chains and the requirement for our suppliers to contractually reaffirm their compliance with the UK Modern Slavery Act requirements
- A refreshed procurement policy, which reflects our commitment to focus on investigating a potential suppliers' ethical supply practices and ensure they align with our own standards.
- Continued robust recruitment processes for our workers in line with UK employment laws, including: 'right to work' document checks and checks to ensure that all candidates hired are over the working age and applying for the role with free will, and that salaries are paid into their named accounts. Market-related pay levels and rewards are reviewed annually to ensure fair levels of compensation to our workforce and wnDirect continues its commitment to paying fair wages, through its Living Wage accreditation. In order to support our employees physical and mental wellbeing wnDirect also continues to trial and run various wellbeing activities and social initiatives. By supporting and getting to know our coworkers, we are more able to identify if there is anything unfair or unjust happening to them in their personal life and help them to overcome it.



FUTURE STEPS FOR 2019

- During this coming year we shall roll out a certification processes to our wider supply base to require suppliers to confirm acceptance of our Code of Conduct and Business Ethics Framework, that their business practices and ethics align with ours, and to provide their workforces with visibility of this Framework and access to our whistleblowing tools.
- We shall also roll out an audit process to question in more depth their business ethics practices and how they ensure these are upheld and monitored, including requesting visibility of how they have provided their workforces with visibility of the wnDirect Code of Conduct and Business Ethics Framework and whistleblowing tools. Where we do not receive replies or we receive deficient or unsatisfactory replies, we will conduct in person investigations, and if necessary, any continued dissatisfaction with a particular audit response will be escalated to the wnDirect Board for sanction instruction.
- Measure and benchmark our performance against the action steps identified in this third Statement, best practice amongst similar commercial organisations, and

emerging caselaw and identify further areas of improvement and impact to add to our annual compliance risk management process.

- Continue to roll-out additional phases of staff training on Modern Slavery.

This Statement is made in accordance with the Modern Slavery Act 2015 section 54(1) and constitutes wnDirect's Slavery and Human Trafficking Statement for the financial year ending 31st December 2018.

Handwritten signature of Simon Batt.

Simon Batt - CEO, wnDirect Limited
Date: 20th December 2018

