

wnDirect Slavery and Human Trafficking Statement 2016

Introduction from Stuart Hill, CEO.

wnDirect find the crime of Modern Slavery abhorrent. We are striving to combat modern slavery within our organisation and the supply chains we impact (as summarised below). The purpose of this Slavery and Human Trafficking Statement is to demonstrate what we have done this financial year and what we plan to do going forwards to eliminate the possibility of modern slavery occurring within our business model.

wnDirect's business and supply chains

- wnDirect are eCommerce delivery experts, helping growing businesses to achieve international eCommerce success by providing managed logistics solutions which overcome the challenges of global expansion.
- wnDirect's 'direct supply chain' consists of our valued eCommerce retailer clients around the world, and our trusted business partners: collection, sortation and freight forwarding partners in the UK, and customs clearance and delivery partners in several international jurisdictions.

Our supply chains and ensuring business partners' & clients' adherence to our values

The relationships with all our partners and clients have been established over a number of years and are built upon trust, respect and mutual values. We have close and personal links and keep in regular contact with the owners, directors and senior managers of each partner and client business we work with to ensure our business and ethical values are aligned.

As and when we select new partners or agree to work with new clients we pre-qualify them through a series of credit and business checks and due diligence questionnaires relating to their business model and service performance. In addition to this we also validate any new partner's reliability and best in class reputation and values through our known networks.

Steps taken by wnDirect to ensure slavery and human trafficking is not taking place in its business or supply chains – Year 1

Board level responsibility and raising staff awareness

- Unanimous endorsement and approval of this Statement and the launch of the wnDirect Modern Slavery Policy has been received from our Board of Directors and Executive Management Team.
- Staff awareness of the risks of modern slavery and human trafficking has been raised by:
 - circulating company-wide emails explaining the impacts of the new legislation, what constitutes modern slavery and human trafficking and why each individual has an obligation to identify and eradicate such abhorrent acts from occurring, the reasoning behind and progress in preparing and launching this statement and the wnDirect Modern Slavery Policy and our overall business strategy currently and going forwards in relation to the fight against Modern Slavery.

- Following the launch and publication of the wnDirect Modern Slavery Policy each employee has confirmed in writing to the Company that they have read, understood and will comply with such policy.
- The employment terms of each wnDirect employee have been amended with the consent of each employee to clarify that it will be an act of gross misconduct to participate, encourage, aid or abet any acts of modern slavery, forced labour or human trafficking.
- All relevant employment policies, including the wnDirect Disciplinary Policy, Business Ethics Policy and Human Rights Policy, published on the Company intranet and that form part of the employees' contractual terms have been updated to include a paragraph strictly prohibiting the use of slavery or human trafficking in our direct supply chain and permitting the termination of employees found to be involved in any breach of the law banning forced labour, slavery and human trafficking.
- A short explanatory video "Understanding Modern Slavery" has been launched on the Company intranet and all staff have been encouraged to watch it. This video is now also included in all new employee induction training sessions.

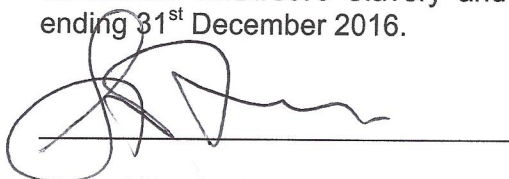
Future steps

To date we haven't been made aware of or discovered any incidences of human trafficking or slavery within our own business or our direct supply chain. However, as a business, we are committed to continually strive to ensure that any mistreatment of individuals is identified and eradicated at each touchpoint of our business and direct supply chain.

Going forwards into our next financial year, we hope to continue to combat modern slavery in the following ways:

- Continue to raise awareness of the risks of modern slavery and human trafficking in our business and direct supply chain.
- Request further information on the business practices of our current and future direct supply chain clients and partners, and in particular, seek to obtain information on how they identify risks of human trafficking and modern slavery within their businesses and supply chains and what actions they would take should they identify any instances of these activities.
- Measure and benchmark our performance against the action steps identified in this statement, best practice amongst similar commercial organisations, and emerging caselaw and identify further areas of improvement to add to our annual compliance risk management process.

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 2016.

A handwritten signature in black ink, appearing to read "Stuart Hill", is written over a horizontal line.

Stuart Hill - CEO and co-founder, wnDirect Limited
Date: 1st December 2016