

The Modern Slavery and Human Trafficking Act:

Statement of Policy by Webmart Ltd

This Act, setting out how modern slavery and human trafficking (SHT) is to be dealt with in the UK, requires all UK businesses with a turnover of £36+m to comply with its terms. Such businesses to publish an SHT Statement for each financial year. The Statement should disclose the steps the business has taken to ensure SHT is not taking place in its own operations or its supply chain, and has to be approved by the Board of Directors.

This Statement sets out Webmart's policy on SHT – in essence, to ensure that the company and its staff understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no SHT in its own business or its supply chains. This statement covers the financial year 2016-2017.

Webmart is a leading Print Management company, based in the UK. It manages the whole range of printed materials and services on behalf of its clients, sourcing its print mainly in the UK, but also across Europe and further afield.

The company is totally committed to preventing slavery and human trafficking in its corporate activities, and in ensuring that its supply chains are free from slavery and human trafficking. Webmart believes in the worth and dignity of each individual and pledges to uphold the basic freedoms of all individuals. We are fully opposed, and will not knowingly trade with, any organisation that denies or restricts these freedoms. The company, too, opposes discrimination of any kind on the basis of race, creed, colour, sex, age, or national origin.

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** The company encourages all its staff, customers and other business partners to report to senior management any concerns related to its direct activities or its chains of operation - including any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Equal Opportunities and Diversity policy:** The company's long-standing policy is applied to all aspects of recruitment and selection, promotion, training, conditions of work, pay and benefits, as well as to general treatment at work. Its practices avoid unlawful discrimination in employment or against its suppliers or customers.
- **Dignity at Work:** This policy is at the heart of how Webmart does business. It strives to ensure that the work environment is free from harassment and bullying and that everyone, including suppliers and clients, is treated with dignity and respect. We strive to maintain the highest standards of conduct and ethical behaviour with all our contacts, in the UK and abroad.
- **Agency Workers:** Webmart does not use employment agencies or other delegated means to source labour.
- **Recruitment and Selection policy:** The organisation treats all candidates equally, fairly and consistently at every stage of the recruitment process, as well as ensuring compliance with legal right-to-work legislation.
- **Pay Rates:** The company goes beyond national minimum wage requirements and pays at least the Living Wage.

Webmart is committed to ensuring that its suppliers adhere to the highest standards of ethics, including the SHT Act. Suppliers are required to provide safe working conditions, to treat workers with dignity and respect, and to act ethically and within the law in their use of labour. The company works with suppliers, to ensure that they meet the standards of the Act in relation to working conditions.

We undertake due diligence when considering taking on new suppliers, review existing suppliers on a regular basis, and are vigilant, in our visits to external suppliers, to ensure compliance with the Act and our ethical codes of practice.

Adequate training is given to all staff on our standards of ethical business and the requirements of SHT Act. This is done, for instance, through publicising the company's stance and policies (e.g. on its website and in its Induction Manual) and through the CEO's video-casts to all staff. It is particularly emphasised to all managers responsible for the organisation's supply chain that they will be vigilant about SHT issues in all their visits to suppliers' premises and that, should they have any concerns, they would raise them formally both with suppliers and our own management.