



Modern Slavery Statement 2017

Introduction

Slavery and human trafficking remains a hidden blight on our global society.

We all have a responsibility to be alert to the risks, however small, in our business and wider supply chain.

Wanzl Ltd takes its responsibilities under the act seriously and to this end has carried out a risk assessment to identify areas for concern.

All members of staff and colleagues in our supply chain are encouraged to share with us any concerns that they have identified and the business undertakes to act upon them.

We believe that a focus on tackling modern slavery has a number of business benefits:

- Protecting and enhancing our reputation and brand
- Protecting and growing our customer base as more consumers seek out businesses with higher ethical standards
- Greater staff retention and loyalty based on values and respect
- Developing more responsive, stable and innovative supply chains

➤ Organisation structure

Wanzl Ltd is one of the leading retail solutions providers in the UK and is part of the Wanzl family of companies. Wanzl Ltd are privately owned company with headquarters in Leipheim, Germany. We employ approximately 700 people in the UK and Ireland, and operate with suppliers in Europe and China.

➤ Policies relating to slavery and human trafficking

- Our employment processes are robust in ensuring that permanent, contracted and temporary staff are not at risk of any form of any slavery or human trafficking
- Our Staff Handbook contains commitments to operating ethically and without discrimination and explains how employees can raise concerns regarding any features of their employment.
- Our Global Sourcing Philosophy highlights how we expect to operate with suppliers in the supply chain and incorporates a reference to our Ethical policy
- Our Ethical Sourcing Policy sets out the requirement for all suppliers within our supply chain to adhere to the ETI base code and makes it clear that the exploitation or the breaching of human rights will not be tolerated.
- We do not typically operate through a third party sourcing company for overseas purchases. However should we do this we would expect the organisation concerned to have robust policies with regard to anti-slavery and a detailed auditing process to be carried out.
- We follow the recommendations of the 'Stronger Together' organisation to target and tackle hidden labour exploitation

➤ Due diligence process in relation to slavery and human trafficking in our business and supply chain

- We visit all suppliers prior to trading with them. Suppliers of high potential risk have a Wanzl Ltd audit carried out prior to engaging in any contract. In addition we have independent local employees to monitor and reinforce our policies. On occasion we also employ independent 3rd party auditors.



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- We are members of SEDEX and request all key suppliers / high risk suppliers to register and complete the SAQ as a minimum. In addition we also carry out our own audits and have 3rd party audits.
- Parts of our business and supply chain where there is a risk of slavery and human trafficking taking place, and steps taken to assess and manage this risk
- Within our business some staff work overtime; this is entirely voluntary.
 - Our recruitment process involves the verification of identity and right to work. We never withhold the personal documentation of an employee.
 - We have extensive HR policies advising the employee and management of what is expected and acceptable in all areas. We provide a channel of communication for any issues directly to HR with anonymity preserved if required.
 - We keep agency labour to the minimum required for our business, and where we do use temporary labour we have defined processes which our agencies have to go through before employing someone on our behalf. This includes questions related to their management of Modern Slavery.
 - On sites where temporary labour is used, we display and distribute 'Stronger Together' material in multiple languages, giving contact details for reporting labour exploitation. Audits are carried out through personal discussion with agency workers, during ad-hoc audits or induction of new agency workers
 - Within our supply chain we operate with suppliers and manufacturers of finished or semi-finished goods, including good of a bespoke nature. We operate predominantly with suppliers of manufactured goods in UK, Europe and China, and with labour suppliers in the UK.
 - All suppliers have received our Ethical policy & Global Sourcing Philosophy.
- Measures of effectiveness in ensuring that slavery and human trafficking is not taking place
- We record all audits that have taken place and note any concerns raised during the process, verbal or written regarding Human Trafficking, forced labour or any breach of Human Rights
 - We have local Wanzl employed representation in the countries where we trade and utilise this resource for spot checks on the behaviour of our suppliers identified as high risk.
 - We have tracking systems on our vehicles to monitor the hours that our road based staff are working.
 - We also have time and attendance processes that monitor the hours our external team and internal (non staff / management) team work.
- Training and capacity building about slavery and human trafficking to our staff
- We aim to ensure everyone in the organisation is alive to the risks of modern slavery. This is to ensure that informed decisions are made in a timely way which mitigate and manage these risks, and to monitor the implementation of relevant policies.
 - Employee communication and training :
 - This Statement will be issued to all staff.
 - Employees will be provided with information on spotting signs of slavery and how to report their concerns



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Managers of sites that use temporary agency labour receive specific information to inform them of the nature and signs of modern slavery, and are required to carry out audits of their sites.

➤ How Wanzl respond to incidents of modern slavery

- If a specific case of modern slavery is identified in the UK, it should be reported to the police or the Modern Slavery Helpline
<https://modernslavery.co.uk/index.html>
If potential victims are in immediate danger the 999 emergency number should be used.
- If modern slavery is identified or suspected abroad, the response will be managed by the Commercial Director. Actions may include engaging with local NGOs, industry bodies, trade unions or local Government and law enforcement bodies, in some circumstances the decision could be made to cease trading with the organisation concerned whilst investigations are carried out.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Wanzl Ltd slavery and human trafficking statement for the current financial year.

Dean Rolland
Managing Director
Wanzl Ltd



WANZL EMPLOYEE MODERN SLAVERY INFORMATION

The Modern Slavery Act 2015 obliges UK businesses with a turnover of £36m or more to identify the steps it has taken to ensure that slavery and human trafficking is not taking place in any of its supply chains, or in any part of its business.

Wanzl embraces this opportunity to tackle the crime of abuse of men, women and children for personal gain.

The Modern Slavery Act aims to eliminate :

- Slavery and Servitude
 - to deprive a person of their freedom, or to coerce a person to provide services
- Forced or Compulsory Labour
 - to extract work or service from a person under coercion or threats of a penalty
- Human Trafficking
 - To arranging or facilitate the travel of a person with a view to that person being exploited

In addition to the Modern Slavery Act, separate legislation exists requiring organisations to drive out poor labour practices, such as

- Paying below the national minimum wage
- Working in unsafe or undesirable conditions or for long hours

What does Wanzl do to ensure there is no modern slavery in our business or our supply chain ?

- Wanzl have published a statement in line with the Modern Slavery Act requirements.
- Our Staff Handbook contains commitments to operating ethically and without discrimination and explains how employees can raise concerns regarding any features of their employment.
- Wanzl monitors working hours and hourly pay rates for our employees to ensure that we comply with UK legislation
- Wanzl monitors our Supply Chain to ensure that ethical policies are in place.
- Wanzl follows the recommendations of the 'Stronger Together' organisation to target and tackle hidden labour exploitation
- We will introduce auditing of temporary labour by the Field Supervisor team, using materials based on 'Stronger Together' content

What is your responsibility as an employee of Wanzl ?

You are required to be alert to signs of modern slavery (see below) and to flag up potential issues.

Spot the Signs

1 PHYSICAL APPEARANCE
Victims may show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn.

2 ISOLATION
Victims may rarely be allowed to travel on their own, seem under the control/influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work.

3 POOR LIVING CONDITIONS
Victims may be living in dirty, cramped or overcrowded accommodation, and/or living and working at the same address.

4 FEW OR NO PERSONAL EFFECTS
Victims may have no identification documents, have few personal possessions and always wear the same clothes day in day out. What clothes they do wear may not be suitable for their work.

5 RESTRICTED FREEDOM OF MOVEMENT
Victims have little opportunity to move freely and may have had their travel documents retained, e.g. P45/P46s.

6 UNUSUAL TRAVEL TIMES
They may be dropped off / collected for work on a regular basis either very early or late at night.

7 RELUCTANT TO SEEK HELP
Victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcement for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.



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If you suspect slavery is happening



Call the Police on **999** in an emergency, or **101** if it is not urgent.



You can also report it by calling the new Modern Slavery helpline on **0800 0121 700***



Using the online form **online form**



If you think you have been a victim, find out how **you can get help**

<https://modernslavery.co.uk/index.html>