



# Modern Slavery Statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and outlines the practices that the Williams Lea Tag Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. This statement constitutes Williams Lea Tag's statement on slavery and human trafficking for the financial year ending 31 December 2018.

Modern slavery encompasses slavery, servitude, human trafficking and forced labor. Williams Lea Tag has a zero tolerance approach to any form of modern slavery. We are strongly committed to playing our part in eradicating modern slavery by ensuring we act ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Williams Lea Tag is the leading provider of marketing and communications supply chain services. We help organizations transform business processes, enhance customer conversations and realise the potential of their brands. Our solutions combine re-engineered processes, leading technologies and highly experienced collaborative client teams. Our financial strength and global reach enables us to deliver these solutions anywhere in the world.

## Our Policies

Our internal policies ensure that we are conducting business in an ethical and transparent manner, such as:

- **Recruitment policy** - which includes vetting, eligibility to work, safeguards our employees against human trafficking or individuals being forced to work against their will.
- **Code of Conduct** - our code defines the objectives and rules that reflect our commitment to responsible, ethically irreproachable and legally compliant behavior from all employees and contractors.
- **Whistleblowing policy** - if there are concerns regarding any unethical conduct within our business, including any forms of modern slavery, we strongly encourage our employees to report the concern so we may properly and quickly resolve the situation. An external and independent whistleblowing hotline service operates 24 hours a day, 365 days a year, across approximately 40 countries enabling our employees to report matters anonymously, without fear of reprisal.



### Our Suppliers

Williams Lea Tag works with a wide and varied network of vendors to execute and support solutions that we design for our clients. Supplier due diligence is a critical part of what we provide for our clients and essential for the security and performance of our own business.

All suppliers to Williams Lea Tag must go through our due diligence process at the on-boarding stage and are then subject to regular audits and reviews. These audits are based on perceived risk (i.e. country of supplier, strategic importance of supplier, and handling of confidential data) with a tiered approach taken to ensure each supplier's corporate social responsibilities are aligned with that of Williams Lea Tag and, most importantly, full compliance with the Modern Slavery Act is met.

Our Supplier Code of Conduct sets the minimum standards for doing business with Williams Lea Tag, and is signed by each supplier as part of the onboarding process, with a follow up questionnaire sent after 6 months of onboarding to ensure our policies are adhered to.

If we find breaches of our code and/or the Modern Slavery Act within our supply chain, we will investigate the issues in detail. Whilst we shall, of course look to support companies in their efforts to comply with the legislation, in the event of a serious breach, termination of the supplier relationship may also be considered.

### Key Performance Indicators

We will know and understand the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Completing annual due diligence, where necessary, on our supplier's code of conduct.

### Looking Forward

We are committed to continually improving the way we educate and inform our employees about modern slavery. Going forward, we aim to:

- Further raise awareness across the global WLT procurement teams, on indicators of modern slavery in the supply chain, and how best to respond and escalate any concerns identified.
- Develop a training module that will be undertaken by all Williams Lea Tag employees to raise a general and consistent understanding of this subject across WLT. This will outline what modern slavery is, how to identify it and what individuals should do if they suspect it is taking place within, or associated to our organisation.

Williams Lea Tag's Modern Slavery Statement was approved by our Group Chief Executive Officer on 1 December 2017.

A handwritten signature in black ink, appearing to read "David Kassler".

**David Kassler**  
Group CEO  
Williams Lea Tag

1 December 2017