



## Modern Slavery Statement 2019

### Introduction

Detected cases of modern slavery within the UK are escalating. Forced labour is a hidden crime undertaken by exploitative individuals and criminal gangs.

The prominence of the issue in our general lives through reports in social media, the press, brand statements and activity has led to an increase in the uncovering of a greater number of victims and has highlighted a more diverse range of industries affected by this blight. The criminals involved in Modern Slavery are becoming more cautious and devious in the ways in which they carry out the crime and it is up to all of us to be knowledgeable about the issue and vigilant about the crime.

Wanzl Ltd takes its responsibilities under The Modern Slavery Act 2015 seriously, we understand that we cannot be complacent and that we need to ensure that we are constantly reviewing all areas within our business and supply chain to ensure that we free from risk. We strive to ensure that engagement with all our stakeholders (employees, customers, suppliers, the local community) is as transparent as possible in this area.

Wanzl Ltd 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 our customer's brand
- 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

- Wanzl Ltd prohibits the use of forced labour or any form of Human trafficking within the organisation or its sub-contractors.
- All temporary staff employed must come from an approved employment agency that has signed a Wanzl Ltd Service Level Agreement and has committed to the requirements therein. Agencies should hold the minimum status of at least a licensed GLA recruitment company with a firm stance and published statement on Modern Slavery and adherence to policies and processes for prevention of forced labour and Human trafficking or any form of humiliating treatment.



- Under no circumstances are employment or recruitment agencies allowed to charge a fee for finding any person work within Wanzl Ltd. Wanzl has a detailed open costing structure that identifies a fair commercial commission / margin for the recruitment agency, to avoid any need for charges to be passed on to potential workers or employees.
  - Under no circumstances are employment agencies allowed to withhold a workers' personal documentation or identification papers.
  - All workers must be able to freely move around and give reasonable notice to leave the employment of Wanzl Ltd or the agency they are employed by.
  - Employment agencies are not permitted to make any unlawful charges to the worker
  - Employment agencies are required to verify that they will carry out suitable checks and audits for all staff provided including:-
    - Suitable level of English language to ensure that all H&S, Welfare and other policies to protect the worker can be understood whilst on Wanzl Ltd premises
    - Verifying Right To Work information
    - Auditing multiple use of a single address, phone number or bank account.
    - Ensure that no worker is treated inhumanely or subject to coercion at any time.
    - Have processes in place for 'Whistle Blowing' and reporting of any concerns to the appropriate authorities
  - Wanzl Ltd reserve the right to audit all agencies for adherence to the above requirements and to be able to carry out checks on the agencies own processes.
  - Our own internal employment processes are robust in ensuring that permanent, contracted and temporary staff are not at risk of any form of 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 Sourcing 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 3<sup>rd</sup> party auditors.
  - We are members of 'SEDEX' and 'Stronger Together' and request all key suppliers / high risk suppliers to register and complete the SEDEX SAQ as a minimum. In addition we also carry out our own audits and have 3<sup>rd</sup> party audits.
  - We reserve the right to audit all employment agencies which provide labour to us in order to independently verify the recruitment practices in place and adherence to our SLA



- 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 or identification papers 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
  - We provide information and coaching to our staff to assist them in identifying signs of Modern Slavery and guidance on how to report this internally and externally.
  - Within our supply chain we operate with suppliers and manufacturers of finished or semi-finished goods, including goods 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 and Modern Slavery statement and policy.
- 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 about slavery and human trafficking for 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 on issue each year and on induction.
    - Employees will be provided with information on spotting signs of slavery and how to report their concerns



- 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 responds to incidents of modern slavery

- If a specific case of modern slavery is identified in the UK, it should be reported (confidentially) to the police on 101  
or  
The Gangmasters and Labour Abuse Authority on 0800 432 0804.  
or  
The Modern Slavery Helpline on 08000 121 700 or [www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)  
or  
The Salvation Army on 0300 303 8151.

These numbers should also be used by any potential victim requiring support and advice.

**If potential victims are in immediate danger the 999 emergency number should be used.**

- If any person within Wanzl suspects or experiences an issue relating to Modern Slavery and would like to confidentially discuss the situation prior to reporting as above, they are encouraged to speak to our HR Manager Sarah Smith on 07834626419 / 01926 451951 or our Operations Director Caroline Phipp on 07921353813 / 01926 451951.
- **Please remember time is of the essence to protect the victim so please do not hesitate to make contact with someone who can help.**
- If modern slavery is identified or suspected abroad, the response will be managed by the Operations 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 but suitable support for any victims should be in place prior to any action taking place.

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

18/3/2019