

## Modern Slavery & Human Trafficking Policy Statement

WW Martin Ltd recognises that modern slavery, forced labour and human trafficking is an issue of global concern, with it being estimated that over 20 million people around the world are in some form of slavery.

We have a zero-tolerance approach to modern slavery and human trafficking, and are absolutely committed to ensuring that there is transparency on these important human rights issues within our own business as well as our supply chains through which we operate. We believe all businesses play a vital role in preventing slavery and human trafficking and we take our responsibilities in that regard very seriously. This statement summarises the steps that WW Martin takes to ensure that our activities are free from slavery and human trafficking.

### Our policies and contracts

WW Martin's Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in respect of all our staff and business relationships. In conjunction with our Whistleblowing Policy, it encourages all our employees to voice any concerns relating to the activities of our own organisation or our supply chain. Our policy is available for our staff on the public drive and is available to our suppliers and clients should they request it. We also have a number of policies prohibiting harassment, discrimination and victimisation which provide our employees access to further channels for raising concerns.

Our contracts of employment comply with relevant local legislations and ensure that individuals are entitled to at least the statutory minimum (including rights in relation to hours, pay and termination of the contract).

### Our supply chains

WW Martin have appropriate processes and systems for conducting background checks (including eligibility to work, references and qualifications).

From time to time we use the services of recruitment agencies. The agencies we use are reputable and we expect them to have the same standards in terms of ethics and legal compliance – including their own policies on modern slavery and anti-human trafficking. Our larger supplier contracts specifically state that suppliers must comply with applicable laws.

In order to mitigate our supply chain risk, we:

- follow an appropriate due diligence process (including appropriate credit and incorporation checks) when considering taking on new suppliers and subcontractors;
- build long-standing relationships with our suppliers and subcontractors as far as possible and make clear our expectations in terms of business behaviour; and
- undertake regular reviews of our existing suppliers and subcontractors.

### Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, over the next year we intend to take additional steps to combat slavery and human trafficking, which include:

- introducing, where possible, contractual provisions for our suppliers and subcontractors to confirm their compliance with the Modern Slavery Act 2015 and to provide information on request in relation to such compliance;
- ensuring modern slavery is addressed in relevant key policies and procedures within WW Martin; and
- referring to our Modern Slavery Policy in the induction process for new staff.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and constitutes the organisation's Anti Modern Slavery and Human Trafficking Statement for the current financial year.



Ian Posnett  
Commercial Director

Dated: 13<sup>th</sup> April 2017