

## **Wilmington plc Modern Slavery Act Transparency Statement**

This statement is made in accordance with the Modern Slavery Act 2015 and sets out Wilmington plc's actions to 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 slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities pursuant to the Modern Slavery Act 2015.

Wilmington takes a zero-tolerance approach to any kind of modern slavery within our operations and supply chains. As a professional services organisation, we consider the risk of Modern Slavery existing within our business to be low. We are not complacent, however. No sector or industry is risk-free. Each of us has a responsibility to be alert to the risks, however small, of modern slavery in any part of our business or supply chains. Staff are expected to report concerns, using the appropriate reporting channels and management are expected to act upon them.

### **Organisational structure and supply chains**

Wilmington plc is formed of over 36 trading companies operating from over 20 offices in 9 countries. Our companies provide high quality networking, information and education services to our clients worldwide.

In doing so, we rely on a small number of suppliers from around the world. We anticipate that with some potential suppliers, their daily operations may not necessarily be conducted according to the ethical and legal standards prevalent in the UK. This necessitates careful evaluation of such suppliers, which Wilmington plc is committed to undertaking.

### **Our policy on Slavery and Human Trafficking**

We are committed to ensuring that there is no slavery or human trafficking in our supply chain or in any part of our business. We are committed to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our business or supply chain. We comply with all applicable employment legislation relating to employee terms and conditions, including pay, and we invest in supporting the health and wellbeing of our staff.

### **Other relevant policies**

We operate the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations. These policies apply across all group companies and in all countries:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise

to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. The whistleblowing procedure can be found on the corporate website (<https://www.wilmingtonplc.com/investors/corporate-governance>)

- **Employee code of conduct** The organisation's values make clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Recruitment/Agency workers policy** We only use specified, reputable employment agencies to source employees/temporary staff members and always verify the practices of any new agency we engage before accepting workers from that agency.

### **Due diligence**

Wilmington plc undertakes formal and informal supplier selection procedures across all our activities. These procedures include risk assessments with reference to slavery and human trafficking. A key element of our supplier selection is to ensure that effective anti-slavery and human trafficking warranties and undertakings are in place throughout our contracts with third party suppliers. Violations of our terms and conditions could lead to the termination of the business relationship

Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier; and
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.

### **Commitment to compliance**

Following the introduction of the Modern Slavery Act 2015, we have set the following commitments:

- requiring all staff to have completed training on modern slavery by 30 June 2017;
- developing a system for supply chain verification expected to be in place by 30 June 2017, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be completed by 30 June 2017, whereby the organisation evaluates all existing suppliers.

### **Training**

We are in the process of scoping a training module to be completed by all staff. Additionally, face to face training along with a full risk assessment of activities will be taking place with our senior leadership team by end of April 2017.

The modern slavery training will cover:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a

country's national minimum wage, or the provision of products by an unrealistic deadline;

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

### **Board approval**

This statement has been approved by the organisation's board of directors, who will review and update it annually.

**Pedro Ros**  
**Chief Executive Officer, Wilmington plc**