



WALSTEAD GROUP MODERN SLAVERY STATEMENT 2016

Introduction

Walstead UK recognise the growing global issue of slavery, servitude, forced or compulsory labour and human trafficking and the affect it has on communities and individuals across the globe, and we are committed to driving up standards and supply chain accountability.

Our Business and Supply Chains

Walstead UK (previously Wyndeham UK) was formed in 1991 and has developed through organic growth and acquisition into one of the UK's leading printing groups. Our customer base reflects the range and flexibility of our services and includes blue chip, household names and local businesses and organisations based in the UK and Europe.

Walstead UK have 8 different locations across the UK, employing more than 1050 people, and operating 6 manufacturing sites. We work with a number of Suppliers who provide a range of goods and services which are essential in the manufacturing process and business support.

We have a complex supply chain consisting of a number of layers in which there may be a few tiers between direct Suppliers and the providers of raw materials. There are challenges associated with such an environment since visibility and transparency throughout the supply chain is more complex. In addition, the printing industry can see seasonal peaks in customer requirements, which can create high-pressure deadlines affecting the workforce. This produces its own challenges. However, we are committed to working with our supply chain to increase visibility throughout these tiers and effectively manage time constraints.

Contractual Controls and Procedures

Our contractual obligations require Suppliers to act in accordance with applicable laws and regulations and we will, over upcoming years, strengthen measures to confirm adherence to the Modern Slavery Act.

Modern Slavery Assessment and Management

Walstead UK have separated our requirements into the following two categories:

1. Goods

There are a number of tiers of suppliers between finished product and providers of raw materials which creates quite a complex supply chain and reduces visibility of human rights practices.

We are proud to promote the use of Small and Medium Enterprises (SME's) at each of our site locations. We feel that by using SME's which are local and known to the relevant site location, we have better control mechanisms and supply chain visibility, in turn reducing our risk of supply chain exposure to countries and locations considered high risk.

The printing environment has an increase in customer requirements at certain times of the year, and it has been documented that such high pressure environments could lead suppliers to violate human rights. Walstead UK work closely with key suppliers which enables us to better forecast our demand and provide regular updates to suppliers

on upcoming work. We feel that this creates less pressure on suppliers to meet tight deadlines, and therefore enforces better practices.

2. Services

As a result of UK legislative rules and regulations, we consider this category to be of lower risk. However, recognising the complexity of the supply chain and the seasonal requirements of the industry, we understand that there is a risk of high pressure deadlines impacting the service workforce.

There are certain categories of workers which form part of a wider vulnerable group, such as those attending factory sites. We consider the working environment to be of great importance and our Health and Safety team work hard to ensure a safe working environment for all persons. In addition, we have made agreements with a number of Contractors who support us with additional workload at busy periods. We also work with a number of agencies who supply personnel on a temporary basis to cover such peaks. With readily available staff and suppliers, there is a reduction in high pressure deadlines and therefore less risk of human rights breaches.

Future Plans

The board of Directors are committed to improving practices in the Walstead UK supply chain and we will be working closely with a number of key suppliers to extend and improve our relationships so that they are better aligned to our business practices. We are also committed to helping suppliers to understand and work towards their own obligations under the Modern Slavery Act.

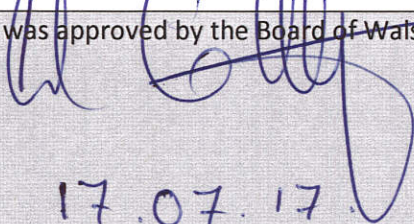
Walstead UK recognise the importance of ensuring transparency throughout our supply chain by monitoring for human rights abuses. As such, we intend to develop contract management plans with key suppliers, including Modern Slavery as an area for regular review. It is also our intention to update and standardise our supplier performance management process to include assessments and audits of human rights practices.

Although we have begun mapping our supply base, we feel that a more indepth examination of suppliers will be beneficial for the next financial year, and we will look to develop a more structured analysis of risk assessment and control measures.

We intend to develop and improve policies and procedures, and raise awareness of these and our Company values throughout our business and supply chain.

The Group have circulated documentation to key people involved in the purchasing and employment process, in order to increase their understanding and awareness of current Modern Slavery issues. It is our intention to expand on these learnings in the next financial year and support personnel in identifying potential risks, escalating concerns, and monitoring compliance. We will also recommend that suppliers take such steps to inform their own employees and subcontractors.

This statement was approved by the Board of Walstead UK Limited.

Signed 

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