

Modern Slavery Statement – June 2022

Introduction

Walstead United Kingdom Limited is a socially responsible business headquartered in the UK. Walstead UK published its initial Modern Slavery Statement in 2017 as required under the Modern Slavery Act of 2015. This document provided a brief overview of Walstead UK and the steps we took to manage the risks associated with modern slavery in the supply chain. The 2022 statement will show what we have learned and expanded on Walstead **UK's** aims for enabling continued transparency and vigilance in our employment and procurement practices.

As the largest independent commercial web-offset printing group in the UK & Europe, we recognise that modern slavery, forced labour and child labour are real issues of global concern. We understand the affect this has on individuals and communities and are aware that being a European organisation does not insulate us from the effects of unethical practice directly on our shop floors, or indirectly through third parties in our supply chain.

Walstead UK Entities

This statement covers all Walstead UK entities that produce goods & services:

- | | |
|---|--------------------------|
| • Walstead Bicester Limited | Company Number: 06941589 |
| • Walstead Peterborough Limited | Company Number: 02261988 |
| • Walstead Roche Limited | Company Number: 00720976 |
| • Walstead Heron Limited t/a Walstead Binders | Company Number: 02586277 |
| • Walstead York Limited | Company Number: 13951156 |

Our business & employment processes

All recruitment takes place in **accordance with employment legislation and in line with the Group's specific Employment Policy. A compulsory 'pre-employment checklist' is issued to all potential new starters prior to employment** which includes a right to work check. This process involves a **full and thorough review of a potential new starter's relevant original identification documentation**. Employment is conditional upon satisfactory documentation confirming the **employee's right to work**.

All pay is in line with National Minimum and Living Wage legislation and all pay and benefits are paid directly into the **employee's bank account with no deductions being made for anything such as accommodation or work finding fees**.

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Our business and supply chain

Walstead UK has grown by winning new business and by corporate acquisitions enabling the provision of a wide range of print and content services for our customers. The size of Walstead UK's offering enables us to serve a wide customer base including globally recognised blue-chip corporations, high street brands and local businesses. We work in partnership with our clients to ensure our supply chain vendors meet the high standards of social responsibility demanded by us as a business and by the end users of our products.

Our supply chain is complex and may consist of different tiers between our direct suppliers and the producers of raw materials. We source our requirements from highly regarded global suppliers who enable us to rely on the integrity of their supply chain, particularly in relation to suppliers of paper, inks and other constituent materials required for the manufacture of printed products.

Our controls and procedures

We continue to conduct modern slavery training with internal stakeholders and we have completed an internal audit of our UK subsidiaries and their suppliers. We discovered that the areas of high risk are not large corporate suppliers, but more local and less publicly transparent service providers. We identified that seasonal peaks and troughs in product demand means that our business uses contingent labour, which is a widely accepted area of risk prone to potential abuse.

We continue to include a modern slavery awareness module, which includes a training pack and video awareness, through our in-house training portal. We also include modern slavery awareness in our business inductions & refreshers which all employees must undertake. **Walstead UK's commitment to the prevention of modern slavery and guidance for employees to report concerns** is documented in our employee code of conduct & integrity principles handbook.

We continue to issue modern slavery compliance questionnaires to our suppliers asking a range of questions including whether or not they are aware of the practice of modern slavery, do they have any company standards, policies or other statements relating to human slavery and trafficking, do they audit their own supply chain in relation to these issues, and have or do they intend to provide training for their workforce. Our modern slavery questionnaire is issued to all new suppliers at point of implementing trading accounts and modern slavery awareness is included in our tender documentation.

October 2021, we introduced a score-based risk assessment. All questionnaire responses are input into the risk assessment tool giving us the benefit of a snap shot view of high risk, medium risk and low-risk suppliers based on the answers provided.

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We maintain our poster campaign across all facilities & in different languages to raise awareness in our factories, providing a safe avenue for whistle blowing should any of our contingent workers be the victims of such practices or know of anyone affected.

Future

Walstead has continued to grow as a business and since the introduction of the Modern Slavery Act 2015, we have not only become more aware of the issues and areas of risk for our business but, more importantly, our responsibilities in relation to victims, the community and all our stakeholders. Our aim is to introduce a European wide standard within Walstead Group that can enable the local sites and their suppliers to identify any occurrence of practices that are deemed **unlawful under the Act and to act accordingly, always considering the victim's welfare first.**

We will continue to perform due diligence exercises when on boarding new suppliers and work to place similar contractual obligations in our contracts throughout Europe.

What is clear is that the purpose of the Act is to introduce a culture of transparency that can enable socially responsible businesses such as ours and those of our suppliers to continue to develop awareness, raise standards and deliver an excellent service from a position of ethical best practice, thus ensuring a viable and satisfactory experience for all stakeholders.

This statement was approved by the board of Walstead Group Limited

Signed;



Matthew Carter

Group Procurement Director

Walstead UK

June 2022