

# Wagonex Modern Slavery Statement 2018

**Wagonex Limited has a zero tolerance approach to modern slavery and human trafficking within the business and supply chains. This is our first statement and it sets out the actions we have taken to prevent modern slavery and human trafficking in our business and supply chains.**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain .

Wagonex is fully committed to acting ethically and with integrity in all our business dealings and to putting in place mechanisms to prevent modern slavery in our supply chains. We are always seeking ways to improve our business practices and will work to minimise the risk of this behaviour occurring.

## **Modern Slavery Committee**

Our Modern Slavery Committee consists of senior management from Wagonex to ensure engagement at all levels across the business. The Committee's primary responsibility is to set the agenda for compliance on a yearly basis, reviewing best practices and monitoring and reviewing the actions being taken by the business.

## **Modern Slavery Policy**

At Wagonex we are committed to complying with the letter and spirit of all laws and regulations. Our Code of Conduct sets out the principles and standards expected of all staff and contractors that will help us grow our business in a responsible, ethical and sustainable way.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls thereby ensuring slavery and human trafficking is not taking place anywhere in our supply chains. Our policy sets out the standards and behaviours expected of all staff, particularly when working with suppliers and other business partners.

As with our other policies, our Modern Slavery Policy encourages our employees to be open and accountable, speak up and report any wrongdoing to a confidential, independently operated hotline available to all employees, officers, consultants, contractors and agency workers to voice any concerns that they have, including concerns about slavery and human trafficking.

## **Due Diligence**

Our aim is to ensure that our own high standards for ethical conduct are shared by each and every supplier with which we do business, from the outset of the procurement process.

We carefully select suppliers in accordance with our Procurement Policy and undertake relevant due diligence on new suppliers. As part of the due diligence we ask our suppliers to register and

achieve a minimum rating on the Chartered Institute of Purchasing and Supply (CIPS) Sustainability Index. Our suppliers answer set questions on Corporate Social Responsibility and those answers enable us to assess their processes and procedures in relation to modern slavery and human trafficking in their own organisation and supply chain. The ratings achieved are used to help us decide whether or not a supplier should be engaged.

### **Provisions in supplier agreements**

As part of Wagonex's standard procurement process, we now place obligations on relevant suppliers that require compliance with the Act. Specifically, those suppliers are required to comply with all anti-slavery and human trafficking laws and maintain their own policies and procedures (including the implementation of due diligence procedures) to ensure compliance with the Act. We require suppliers to report any incidents or suspected incidents of modern slavery to us and we reserve the right to terminate our relationship with suppliers if they breach the anti-slavery and human trafficking provisions.

### **Our ongoing commitment**

Wagonex understands that we have a responsibility to continue to assess and mitigate the risk of modern slavery throughout our business and supply chains.

Following the publication of our Modern Slavery Policy, we plan to develop the knowledge and understanding of modern slavery around both of our businesses through staff training so that our employees are able to identify and address potential modern slavery risks. We will also continue to monitor our supply chain and prioritise higher risk suppliers for the mitigation measures we implement. We plan to conduct audits of key suppliers in high risk categories to ensure they are compliant and that their CIPS SI rating is reflected in the workplace environment.

We will always work to the highest professional standards and shall continue our efforts in eliminating acts of modern slavery within our business and supply chain.