

**Wagstaff Bros Ltd**  
**Modern Slavery and Human Trafficking Statement**  
**March 2019**

## **Introduction**

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year **1 January 2018 to 31.12.2018**.

The statement sets down Wagstaff Bros Ltd commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

## **Organisational structure and supply chains**

Wagstaff Bros Ltd is a private limited company owned by family members and has traded since 1903.

This statement covers the business activities of Wagstaff Bros Ltd which are as follows:

- The sourcing, supply and installation of office equipment;
- The hire of office equipment;
- Commercial fit-out operations.

The Company currently operates in the following country:

- United Kingdom.

The following is the process by which the Company assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking.

- We monitor those countries where there are reported risks of slavery or human trafficking. The supply chain to the company do not include areas where there are such reported risks;
- We assess the products that we procure and sell to end users for any incidence of potential slavery;
- The company sources timber based products through the Forest Stewardship Council which monitors supplies from forest lands to the end user;

We have developed or are in the process of improving, developing and updating the following policies as part of our control of risks associated with slavery and human trafficking and alerting our staff and suppliers to the fact that that the company will not tolerate or be associated with any such activities

- Anti-Bribery & Corruption Policy;
- Procurement Policy ;
- Corporate Social Responsibility;
- Contracts Policy ;
- Employment and recruitment policies which comply with all UK law;
- Whistleblowing Policy – by which staff can alert senior management to any suspicion of slavery or human trafficking.

### **High Risk Activities**

The following activities are considered to be at high risk of modern slavery or human trafficking;

- At the time of this statement we are not aware that there are any high risk areas in the office equipment industry and will review this statement on a regular basis and in the light of any alerts that may be issue by the authorities. Furthermore we shall take account of all those companies with whom we deal to satisfy ourselves that there are no indication of slavery or human trafficking

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policies: The Company Secretary in liaison with the directors is responsible for creating and reviewing policies. The process by which policies are developed is by looking at best practice and adapting to the needs and legal obligations of the company.
- 1.2 Risk assessments: risk assessments are being developed to establish whether there are any risks in our industry of modern slavery, human trafficking or the infringement of human rights.

### **Training**

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to read and understand this policy and be alert to any indications that slavery or human trafficking exists within our organisation or supply chain..

## **Policies**

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

## **Due Diligence Processes for Slavery and Human Trafficking**

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes maintaining and building long-standing relationships with suppliers and making clear our expectations of business partners.

## **Performance indicators**

The Company will use the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including training staff and publishing our Modern Slavery and Human Trafficking Statement.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

**Name:** Richard Ansell

**Position:** Chairman

**Date:** 31 March 2019

**Signature:**

A handwritten signature in black ink, appearing to read 'R. Ansell', written in a cursive style.