

## **MODERN SLAVERY STATEMENT 2019**

This statement is made as part of WIDDOP and Co.'s commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the "Act"). It summarises how WIDDOP and Co. operates, the policies and processes in place to minimise the possibility of any risks we have identified, how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act and relates to the financial year January 2018 to December 2018. It was approved by the board of Directors on 26th July 2018.

### **Our Business:**

Here at WIDDOP and Co. we pride ourselves in offering good quality products with excellent service to our customers. We are focussed on doing the right thing for our customers and our staff. We believe in treating people fairly and ethically.

This also extends to our supply base. We expect our suppliers and the factories used to make our products to operate to our high standard. All workers must be treated fairly. We make this clear to our suppliers in our Supplier Manual, which documents our expectations and requirements. Our terms and conditions for all purchase orders state clearly that the Supplier Manual requirements must be adhered to by all our suppliers.

### **Ethical Code of Conduct:**

Our Ethical Code of Conduct aims to remove the opportunity for Modern Slavery in our supply base. It is the same as the ETI base code.

As set out by the Act, 'modern slavery' encompasses the offences of slavery, servitude, forced or compulsory labour and human trafficking. As employers and providers of goods, we acknowledge that we have a role to play in eradicating modern forms of slavery as described in the United Nations Guiding Principles on Business and Human Rights. We are committed to working with our suppliers to understand and enhance the role we can play in eradicating slavery.

### **Sourcing Overview:**

Our supply chain involves a diverse number of product types and processes. We source from many factories due to the nature of the products we provide. China, accounts for most of the production sites we use.

We use one labour service provider here in the UK.

## **Our Approach to Slavery and Human Trafficking:**

Identifying and reducing the risks of slavery and forced labour in our supply chains is already an area which WIDDOP and Co. is committed to through our Ethical Code of Conduct, that is included in our Supplier Manual.

We acknowledge that the Act covers not only our supply chain but also our UK business operations and both areas will be covered in this statement.

### **1. Operations**

We directly employ 134 people in the UK. As part of our Recruitment Policy, we carry out direct recruitment wherever possible and ensure that employees have the relevant right to work documentation and suitable contractual arrangements.

Taking into consideration the offences of slavery, forced labour and human trafficking which are covered by the Act, we consider the area within our UK operations which could present a heightened risk of such offences, to be related to temporary or seasonal workers employed indirectly on our behalf in our warehouse.

For temporary workers we partner with a reputable preferred supplier who follows a robust recruitment procedure to ensure compliance with the Act. We have visited their offices to understand their approach to the Act and learn more about their relevant policies and procedures.

Our Staff handbook contains the following policies that refer to Modern Slavery:

- Equal Opportunities and Dignity at Work Policy
- Anti-Bribery and Corruption Policy
- Confidential Reporting of Concerns (Whistle blowing) Policy

### **2. Supply Chain**

We are working with our supply base to have independent 3<sup>rd</sup> party ethical audits carried out. As a minimum all factories must:

- complete an factory profile document
- display the ETI Code of Conduct in Chinese (if applicable) in the factory

We aim to increase our spend with audited factories year on year.

Our Ethical Code of Conduct sets out the standards that we require at all the factories used to manufacture WIDDOP and Co. products. It is part of our terms and conditions of trading. Our Code of Conduct is based on the ETI Base Code and on the conventions of the International Labour Organisation.

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed.

In addition to these requirements, suppliers must comply with all relevant local and national laws. If there is a conflict between national law and the Code of Conduct, the supplier must adhere to the standard which provides the worker with the greatest protection.

## **Risk Assessment and Management:**

1. We have mapped our service provider and product manufacturers here in the UK and documented their approach to compliance with the Modern Slavery Act, whether they are directly affected by it or not.

We prefer to direct recruit and keep outsourced labour to a minimum. We have one labour provider and we have carried out an on-site visit to go through in detail how they prevent modern slavery with their workers.

2. Our non-UK product supply base is known to the tier one level. We regard this entire supply base as high risk. In order to ensure our code of conduct is being followed by our suppliers, we review and approve independent 3rd party factory audits which have been carried out to an internationally recognised method – SMETA or BSCI.

With new suppliers, audits will be assessed, and any critical non-compliance would have to be resolved immediately before any business can commence.

If an existing factory has a critical non-compliance found in an annual audit, we work closely with the supplier and factory to help resolve the critical non-compliance quickly through a corrective action plan. In severe cases, if we believe no progress can be made, if progress is not forthcoming or is based on falsified records, we will end the commercial relationship.

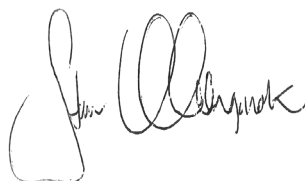
3. We are working towards continually improving our supply base and getting factories independently audited, where commercially feasible. We are set targets in 2018 for our supply base by value spent and number of products from audited factories. By the end of December we had exceeded the targets.
4. All new factories are asked for an audit report. Any factories that we buy from who do not have an ethical audit are required to complete a factory profile document and display the ETI Base Code on their workers notice board. We review the factory profile to assess any risk factors.

## **Awareness and Training:**

1. In 2018, we provided training at Board level, management level, to our office-based staff, warehouse staff and sales team on the Modern Slavery. Training regarding the Modern Slavery Act will be given to all new starters.
2. We have plans in place to train our two main agents based in China on Modern Slavery in 2019, so they fully understand our requirements and ensure that they comply, and that our requirements are properly communicated to our supply base. This will be an on-going program and involve regular factory visits by WIDDOP and senior management to the factories.
3. There is awareness across the UK workforce with Modern slavery signage present on the staff notice board.
4. We are working with anti-slavery charity Hope for Justice and are a founding member of their Slave-free alliance programme. We had a risk assessment carried out on our UK operation in November 2018.

This statement was approved by the board of WIDDOP and Co.

Signed



Stephen Illingworth  
National Accounts and Product Development Director  
January 2019