



Secured Mail Modern Slavery and Human Trafficking Statement & Policy

Introduction

This Modern Slavery and Human Trafficking Statement sets down Secured Mail's 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

This statement covers the business activities of Secured Mail Ltd.

The companies above provide collection, delivery and sortation services to the retail, wholesale and financial services, with a particular focus on Ecommerce, Managed mailing services, International mail, Ecommerce, bulk mail and unsorted options through its supply chain. We have a turnover in excess of £200M, and our supply chain is based both domestically and internationally. We have Sites across the United Kingdom, in Warrington and Luton. We use trusted external providers as part of our international delivery operations, delivering to international customers.

Secured Mail Ltd currently operates in the following countries:

- United Kingdom
- Europe

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

As part of the supply chain we undertake due diligence to ensure we are not entering into a contract or services that could be misconstrued and demand of our suppliers the highest credentials. This also includes any agencies that supply the group with temporary labour. We undertake company checks and satisfy ourselves of the viability of the company we do business with. We would also take account of any Foreign Office advice relating to countries we provide services to.



High Risk Activities

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

Employment of foreign nationals who are not permitted to work in the UK.
Our vehicles or those of our suppliers crossing UK borders

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

- 1.1 **Policies:** Human Resources in each business unit are responsible for creating and reviewing policies. The process by which policies are developed is to review best practice and legislation and adapt policy to the needs of the organisation.
- 1.2 **Risk assessments:** Compliance Manager and Health & Safety and Process Manager is responsible for risk assessments in respect of human rights and modern slavery by a process of planned review, audit and control activities
- 1.3 **Due diligence:** Human Resources and Finance departments, along with the Compliance Manager and Health & Safety and Process Manager are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the organization requires all relevant staff to undertake online awareness training in Modern Slavery and Human Trafficking

Policies

The organisation operates the following policies that describes Secured Mail's approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy.** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can by completing our confidential disclosure form.



- **Employee code of conduct** - The organisation's code contained in Employee handbooks makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Supplier/Procurement code of conduct** - The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** - The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. We regularly audit employment agencies we use to ensure that all right to work and identity checks are being carried out.
- **Corporate Social Responsibility (CSR) Policy** - The organization's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities

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 building long-standing relationships with suppliers and making clear our expectations of business partners as well as evaluating the modern slavery and human trafficking risks of each new supplier. This includes invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company uses 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.

- The use of labour monitoring and payroll systems.
- Outcomes of employment agency auditing process
- Annual risk assessment data
- Number of complaints raised

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: Mark Bigley
Chief Executive Officer

Position:

Date: 1 June 2018

Signature:

A handwritten signature in black ink, appearing to read 'Mark Bigley', is written over a light grey dashed line that extends from the 'Signature:' label.