

Introduction

This statement sets out WIS International's ("Company") actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2015 to 31 March 2016.

WIS International recognises that it has a responsibility to take a robust approach to slavery and human trafficking. As such the Company is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of WIS Intl UK

- WIS International is a privately held corporation that provides inventory and retail management services to international, national, regional and local retail organizations. Due to the nature of its business operations the Company does not employ a supply chain.

Countries of operation and supply

WIS Intl (UK) currently operates in the following countries:

- UK, Southern Ireland, Europe.

Directors believe that the risk of failing to comply with the Modern Slavery Act 2015 within WIS UK is low, because of the following measures:

- All employees are on full written conditions of employment that are standardised around two models that have been checked for compliance with the Act.
- All employees are paid at or above the "Living Wage".
- No casual labour is entertained within WIS UK
- There is no unpaid work experience or internships offered at WIS UK.
- Appropriate training of relevant staff will be identified and carried out prior to the financial year end.

Responsibility

Policies:

The Managing Director of the UK is responsible for managing and leading the development of new, and review of existing, policies and procedures in WIS UK. All policies are subject to a sign-off process

Risk assessments:

We state within our Health and Safety Statement and associated risk assessments that we will comply with all miscellaneous legislation, but will make specific reference to the MSA in the future. Production of our Modern Slavery statement will also mitigate any future unknown risks.

Investigations/due diligence: In the event that any investigations or additional due diligence is required Garbutt and Elliot (company appointed Auditors), would be consulted and the work would be scoped and an appropriate fee charged.

Training: A multi media approach is utilised for the cascading of the MSA policy and responsibilities to all employees and suppliers. Assessing suitable training interventions is work in process and investigations for required training are continuously being explored and assessed.

Relevant policies

WIS International operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy** WIS International encourages all its associates, customers and other business partners to report any concerns related to the direct activities of the Company relative to matters pertaining the slavery and/or human trafficking. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company'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 [use our confidential helpline/complete our confidential disclosure form].
- **Employee code of conduct** WIS International's code makes clear to employees the actions and behaviour expected of them when representing the Company. WIS International strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad.

Approvals:



Amanda Bowers, Head of Human Resources UK

1/9/16
Date



Geoff Chaplin, Managing Director UK

01/09/16
Date