



## **Anti-Slavery and Human Trafficking Statement (Modern Slavery Act 2015)**

### **Introduction**

Whistl is committed to a zero-tolerance approach to slavery and Human Trafficking. We continuously improve our practices to combat slavery and Human Trafficking, to help protect the most vulnerable and to prevent the violation of human rights.

This statement has been published in accordance with the Modern Slavery Act 2015 and relates to our financial year 1 January to 31 December 2024. It sets out the steps taken by Whistl to understand all potential Modern Slavery risks to our business and the measures we take to ensure that there is no slavery or Human Trafficking in our own business or in our supply chains.

### **Our Business and Company Structure**

Whistl is the delivery management partner of choice for online retailers and brands providing efficient, high-quality, competitively priced integrated mail and parcel delivery, fulfilment, contact centre and advertising solutions. Headquartered in Marlow, we manage UK-wide and international delivery services.

The business is owned by management with a minority shareholding held by PostNL and the Business Growth Fund (BGF). We have around 1795 employees across sites in Glasgow, Bolton, Bedford, Bristol, Belfast, Rushden, Nottingham, Gateshead, Paignton, Wrangaton, Lutterworth, Leicester and Northampton, Birmingham, Leeds as well as in our head office in Marlow.

For the purpose of this statement, we use the terms “Whistl” and “Group” to encompass the activities of following companies:

- Whistl UK Limited
- Whistl (Doordrop Media) Limited
- Whistl Fulfilment (Rushden) Limited
- Parcelhub Limited
- Whistl Fulfilment (Gateshead) Limited
- Spark Etail Limited
- Whistl Fulfilment (South West) Limited
- Relish Agency Limited

### **Our Policies on Slavery and Human Trafficking**

Whistl is committed to ensuring that there is no Anti Slavery or Human Trafficking practices within our business or in our supply chain. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and Human Trafficking are not taking place anywhere in our supply chain.

This policy works in conjunction with a range of other relevant policies and procedures that set out steps to be taken to support the identification and prevention of slavery and Human Trafficking in the business. All our policies are reviewed and updated on an annual basis and are freely available to employees through our intranet and shared with suppliers periodically.

During 2024 we continued to undertake a review of related policies and procedures to ensure there is explicit reference of our expectations of all workers with respect to any risk of slavery or Human Trafficking that they may become aware of internally or within our supply chain.

This includes a range of internal policies such as:

Whistleblowing Policy & Procedure; Conduct and Capability Disciplinary policy, Anti-Harassment and Bullying Policy and Procedure, Anti bribery and corruption policy, Employee Wellbeing, Risk Management policy, Human Rights Policy, Grievance policy, ESG Policy, recruitment policy, Modern Slavery Policy.

All policies are compliant to UK law regarding the employment of people.

We have a Supplier Charter in place, setting out a code of conduct we expect from all our suppliers. This is incorporated into our supplier onboarding processes and contracts and is a pre-requisite for supplying goods and services to us. [www.whistl.co.uk/corporate-documents](http://www.whistl.co.uk/corporate-documents)

We will continue to review and update our policies and procedures to raise greater awareness of how Modern Slavery and Human Trafficking impacts our business.

## **Due diligence processes for Anti Slavery and Human Trafficking**

### **Our Workforce – Verification**

We regularly undertake appropriate checks in respect of our employees and contract workers through Right to Work checks, DBS checks, referencing and validation of personal information. We further verify the information supplied to us, by carrying out regular audits. Any issues identified in relation to data provided by employees, for instance shared addresses, bank accounts and/or other risk factors, are investigated. In 2024 no areas of concern were identified following the investigation of flags raised through these checks.

We continued to work with our suppliers to ensure they maintain a high standard of verification setting out clear expectations of checks and verifications to be completed at every level. Our Service Level Agreements with recruitment suppliers accurately reflect updates and changes to our own Anti-Slavery and Human Trafficking policy

### **Audits**

We carry out regular audits in relation to the employment of our employees and the arrangements with our contract workers to detect any potential breaches. Audit standards are regularly reviewed to ensure that they remain fit for purpose and are compliant with prevailing law and practice.

This practice of regular audit and review will continue in 2025

### **Supply Chain Compliance**

97% of our supply chain are GB-based. Due to the nature of our business and the areas in which we, and our supply chains operate, the level of risk has remained low.

Through our onboarding and ongoing supplier due diligence process, we regularly assess the risk levels within our supply chain and work with suppliers to ensure they certify that they comply with the laws regarding Modern Slavery and Human Trafficking in the country or countries in which they do business.

Our procurement processes ensure that:

- All existing and potential suppliers confirm compliance with relevant Anti-Slavery and Human Rights legislation as well as agreement to our Supplier Charter. Agreement to our Supplier Charter by strategic suppliers has increased from 91% in 2023 to 94% in 2024 (based on spend).
- Potential suppliers confirm commitment to our Anti-Slavery and Human Trafficking Statement, Policies and Procedures as part of a Request for Proposal (RFP) prior to being considered as a supplier.
- Our terms of business clearly set out supplier obligations in relation to Modern Slavery both for their own business and their supply chain.
- Where relevant, suppliers are required to complete additional due diligence on their processes, Policies and Procedures in place to assure compliance with Anti-Slavery and Human Trafficking laws.
- Suppliers are required to have a training programme for their employees and where relevant, their suppliers relating to Modern Slavery.

At each stage of the procurement process, any supplier who is unable to demonstrate compliance is removed from the process.

### **Risk Assessments**

The Group has determined its key principal risks as those that the Group considers material and which could have a significant impact on the Group's financial position, its operations and/or reputation. The Board of Management recognises that the risks faced by the Group, change and it regularly assesses risks to manage and mitigate any impact.

Whistl is committed to ensuring that there is no Anti Slavery or Human Trafficking practices within our business or our supply chain.

Our Modern Slavery Committee meet at least twice per year and includes representation from across the business. See below for internal accountability.

We undertake risk assessments of the following:

- Country risk – the location of Whistl's operations: Whistl's operations take place in the United Kingdom which is not considered to be a country with significant risk of Modern Slavery and Human Trafficking.
- Sector risk. We consider all the businesses within our Group and review which parts (if any) are vulnerable to Modern Slavery and Human Trafficking. The assessments of our sectors show that they are not industries associated with risk.
- Supply Chain Risk. We've risk assessed all suppliers who have been through our onboarding and sourcing processed during 2024. Suppliers are prompted to review and update their information annually via our supplier portal. For more information refer to our ESG report; [www.whistl.co.uk/company/esg](http://www.whistl.co.uk/company/esg)
- Transaction risk. We review our counterparties in the manner described above. In 2024, no significant risk of non-compliance was identified amongst our current suppliers.

### **Training**

All employees have been required to complete mandatory compliance training on induction, and then biannually. The Business Ethics and Whistleblowing training includes a module on Modern Slavery and Human Trafficking. We have in place a key performance indicator that requires no less than 85% of our workforce to have successfully completed this compliance training at any point in time.

All Whistl employees and management who have direct responsibility for supply chain management are provided with appropriate training on Human Trafficking and slavery, particularly with respect to eliminating risk within our supply chains.

Additional briefings and support materials are available to key employees involved in recruitment, on-boarding, line management and supplier relationship management to ensure appropriate knowledge and skills are available to identify, report and address any areas of concern.

### **Internal Accountability**

We have zero tolerance for any acts of slavery and Human Trafficking. To ensure all those within our business, supply chain and contractors comply with our values and ethics, we have in place an ESG Strategy and programme of works. Our compliance team consists of individuals from:

- Legal;
- Audit and Compliance;
- Human Resources;
- Procurement;
- Security;
- Marketing and Communications; and
- Environmental, Social and Governance (ESG)

That team meets together at least twice a year to review progress and identify any areas of continuous improvement.

### **Key Performance Indicators**

We have a set of Key Performance Indicators that are measured by Whistl, and which will help inform audits with suppliers. These include measures around:

- Anti-Slavery and Human Trafficking Training - Completion and successful assessment of learning as a percentage of the workforce.
- Verification Checks – Number of potential risks identified through checks, resolution times and outcomes.
- Whistleblowing Reports – Time taken to act investigate and resolve any risks identified.
- Supplier Charter Compliance – Percentage of strategic suppliers in agreement with our Supplier Charter.

The results of the Key Performance Indicators are reported to the Executive Board of Whistl on a quarterly basis.

*This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and Human Trafficking statement for the financial year ending 31st December 2024*

Name of Director: Lynn Dillon

Signatory Title: HR Director

Signature of Director:

A handwritten signature in black ink, appearing to be "L. Dillon", written in a cursive style.

Date: 30 June 2025