



## Modern Slavery Statement 2020

### Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1<sup>st</sup> January 2020 to 31<sup>st</sup> December 2020.

Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This statement is made pursuant to Section 54, of the Modern Slavery Act 2015 and sets out the steps the WildHearts Group ("the Group") has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

### Our Business

WildHearts launches companies that, through their activities and profits, champion economic and social inclusion.

In the UK we provide an enterprise training programme that helps businesses identify, attract, and retain talent. We also provide an Office Products solution to corporates, the profits of which are used to fund the delivery of enterprise training into UK schools and to help empower the poor internationally.

### Our High-Risk Areas

Our business supplies a diverse range of office products originating from a variety of different manufacturers. It is important that WildHearts selects and works with appropriate wholesale and fulfilment partners that have the necessary policies and procedures in place to ensure an ethical and compliant supply chain.

Our microfinance activities, by their nature, are focussed on the developing world and in territories where there are higher risks of exploitation of people. It is important that WildHearts undertakes appropriate due diligence and ongoing monitoring of our field partners in order to ensure that their conduct is consistent with and also positively addressing our social mission.

### Our Supply Chain

We only use suppliers that have gone through our rigorous Supplier Approval process and have shown to us, that they share the same high standards and values as WildHearts. We adopt a risk-based approach when conducting due diligence on suppliers before allowing them to become an approved supplier. This due diligence includes, but is not limited to, enquiries in respect of the organisation's own policies and procedures and research to ensure that the organisation has never been convicted of offenses relating to modern slavery. A consistent and mutual stance against modern slavery is a core part of our relationship with all suppliers and they are required to confirm that no part of their business operations contradicts our policies.



## Modern Slavery Statement 2020

WildHearts Supplier Code of Conduct provides a foundation for the Group and its suppliers to build and maintain relationships based on fairness, trust, respect for the rights of individuals, compliance with the law, and sustainable business practices.

In respect of our microfinance partners, we undertake thorough due diligence in respect of any new partners as well as a programme of ongoing monitoring visits to the areas that we fund. During these visits, we meet with and interview end beneficiaries of our funding as well as field personnel running the microfinance programme.

In our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business, the Group will refuse to do deal with suppliers who do not comply with the law.

### Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

**Anti-Slavery and Human Trafficking Policy** – This policy sets out the Group’s stance on modern slavery and explains how employees can identify and report any instances.

**Whistleblowing policy** - The Group encourages all its workers, customers, and other business partners to report any concerns related to its direct activities or its supply chains.

**Employee Code of Conduct and Ethics** - The Employee Code of Conduct and Ethics sets down the actions and behavior expected of employees when representing the Group. Our core values and behaviors are central to our business and how we operate across the globe.

**Recruitment and Vetting Policy** - Our recruitment process includes “Right to Work” confirmation. This helps to safeguard against human trafficking or individuals being forced to work against their will.

**Living Wage** – WildHearts Group is committed to ensuring all employees are paid the UK Real Living Wage and encourage suppliers to do so where practical.

**Corporate Social Responsibility (CSR) Policy** - The Group’s CSR policy summarizes how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

### Due Diligence

The Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Group’s due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners. Evaluating the modern slavery and human trafficking risks of each new supplier and 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.

We expect our employees and suppliers to always comply with our Code of Conduct. Our employees are required to:

- Read and understand WildHearts policies and the Group expects its employees to know the values and behaviors expected from them.
- Promptly report any concerns about any violation of WildHearts policies.



## Modern Slavery Statement 2020

- Co-operate with any investigation related to a violation of WildHearts policies.

Our recruitment process includes “Right to Work” confirmation.

We also encourage our employees and suppliers to raise any concerns they have with us directly. Where concerns are raised, we investigate the matter fully and act where appropriate.

All suppliers must accept and adhere to the Supplier Code of Conduct before being registered as an approved supplier.

### Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- There is no evidence of modern slavery practices found during monitoring visits to the microfinance projects we fund.

### Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Group provides training to all employees as part of their induction and all staff must undertake annual refresher training and awareness.

Individuals responsible for procurement decisions and those that deal with our microfinance partners are provided with ongoing training so that they can understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

The Leadership team is responsible for this statement and associated policies. Approval was agreed by the board of directors on 4<sup>th</sup> January 2021.

**Mick Jackson**  
Founder and CEO  
January 2021