

## MODERN SLAVERY ACT STATEMENT

Digital Mailing Solutions' core value statement, "We do things the right way," defines how we've chosen to conduct our operations and sets the tone for how we interact with our stakeholders. Employees of Digital Mailing Solutions are committed to treating our clients, business partners, co-workers and communities where we live and work with fairness, honesty, respect and integrity.

This statement further sets out the steps we are taking to combat slavery and human trafficking.

### ORGANISATION'S STRUCTURE

Digital Mailing Solutions is a technology company powering both physical and digital communications. Digital Mailing Solutions has its head office in London, covering the United Kingdom and Northern Ireland territories.

### OUR SUPPLY CHAINS AND DISTRIBUTION CHANNEL

Our supply chain and distribution channel includes:

- Procurement of hundreds of products, parts, supplies and services from suppliers located in multiple geographies (including The Americas, Europe and Asia);
- Warehousing and distribution from strategically located, third party facilities in North America and Europe and
- A direct sales force, and third party channel, retained to distribute and resell products and services.

### OUR APPROACH TO PREVENTING SLAVERY AND HUMAN TRAFFICKING

We are committed to maintaining business operations, including our supply chain, that do not use or rely on modern slavery or human trafficking; to acting ethically and with integrity; and to implementing and enforcing effective systems and controls in an effort to prevent slavery and human trafficking in our supply chains.

**Employee Accountability Standards:** Our internal accountability standards for employees are found in our Business Practices Guidelines (our employee code of conduct), our human resources policies and local rule of law. Our employee code of conduct provides that "Digital Mailing Solutions opposes the use of forced labour or the unlawful employment of children in any place where we do business, or by any contractor, agent or supplier with whom we do business." Our corporate Human Rights Policy, based on the core standards of the International Labour Organization (ILO), and provides that the Company "supports (to the full extent permitted by law), conduct that is consistent with the four core principles of the ILO Declaration on Fundamental

Principles and Rights at Work.” Subject to the provisions or requirements of local law, and after due diligence and full and fair investigation, any employee found to have engaged in slave labour or human trafficking will be subject to immediate termination of employment.

#### **Supply Chain Accountability Standards:**

- **Supplier Selection:** As part of our initiative to identify and mitigate risk our Supply Chain and Procurement functions engage in verifications of suppliers to evaluate and address risks of human trafficking and slavery in the supplier's quality, environmental, human resources and security standards and operations. These verifications are conducted in connection with our pre-contract due diligence and evaluation process as further detailed in the section below on “Risk-based assessments and audits”. Once approved the supplier must contractually commit to meeting our standards or be subject to restrictions or termination of their contractual relationship with us. Key suppliers are also subject, through contractual provisions preserving audit rights for us and any third party reviewer we retain, to a review of the supplier's facilities. We currently do not conduct any verification regarding whether our suppliers use labour brokers.
- **Supplier Code of Conduct:** Each of our suppliers is required to acknowledge and adhere to our Supplier Code of Conduct, to seek to conform to its standards and provisions and to apply the Code to their suppliers engaged in the production of goods for the Company. As stated in our Code we require that, as a condition of doing business with us, suppliers:
  - agree not to engage in any form of human trafficking or slavery. We can give suppliers examples of good management practices for evaluating and addressing risks of human trafficking in their own supply chain including not using forced or involuntary labour of any type or illegal child labour. All employment must be voluntary and legal. (Code page 4.)
  - comply with all applicable wage and hour laws and regulations including those relating to minimum wages, overtime hours, piece rates and other elements of compensation and provide legally mandated benefits. (Code page 5.)
  - treat all employees with respect and not use corporal punishment, threats of violence or other forms of physical coercion or harassment. Every supplier should have a policy that prohibits inappropriate conduct and a process for employees to report such conduct for supplier's investigation and resolution. (Code page 7.)
- **Risk-based assessments and audits:** Digital Mailing Solutions, in its discretion, expressly reserves the right to verify a supplier's compliance with the Code through audits or on-site inspections including interviews of the supplier's employees in order to evaluate supplier's compliance with our standards for trafficking and slavery in supply chains and other Digital Mailing Solutions supplier standards. Such audits or inspections can be carried out by us or by a third party at our request. We reserve the right to conduct or appoint third-party auditors to conduct, audits of our key suppliers' operations and facilities for a broad range of standards including, but not limited to, quality, environmental, human resources and security standards and operations. These audits are arranged in advance with the cooperation of the supplier and usually consist of interviews with supplier management and facility inspections.

Our future plans include implementation of a programme, based on a geographical risk assessment, to determine status and risk in our supplier base and a review of Modern Slavery as a topic in regular Supplier Business Reviews.

- **Whistle-blowing:** Digital Mailing Solutions provides an anonymous and contact form for employees, clients, suppliers and others to make inquiries and report concerns about potential violations of Company policy or the law. The Ethics Help Form is available, 24 hours a day, seven days a week for concerns to be submitted anonymously (if they so choose) and without fear of retaliation. (<https://www.digitalmailingsolutions.co.uk/ethics-contact>)

## TRAINING

To better sensitize our supply chain employees to the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to that staff. All Digital Mailing Solution employees receive training on our Business Practices Guidelines which requires their compliance with law and Company policy on a periodic basis. Both management and non-management employees in our Supply Chain and Procurement functions will receive refresher training on human trafficking and slavery risk mitigation and avoidance during the course of the year. Digital Mailing Solutions is committed to the highest standards of conduct throughout our supply chain. On a regular basis we review and update our policies and procedures to ensure that our high standards are upheld and to guard against the mistreatment of anyone in our supply chain.

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 31 December 2018.

This statement was approved by the Managing Director of Digital Mailing Solutions.



Brooke Escudier  
Managing Director  
Date: 1 January 2018