Modern Slavery Statement for 2025

Modern Slavery is a serious crime and can take many forms including the trafficking of people, forced labour, servitude, slavery and exploitation. Modern slavery victims can often face more than one type of abuse and slavery, for example if they are sold to another trafficker and then forced into another form of exploitation. A person is considered to be trafficked if they are brought to a country or location by others who threaten, frighten, hurt and force them to work or do other things against their will.

Children (those aged under 18) are considered victims of trafficking, whether or not they have been coerced, deceived or paid to secure their compliance. They only need to have been recruited, transported, received or harboured for the purpose of exploitation. It is not an issue confined to history or an issue that only exists in certain countries. It is something that is still happening today, and it happens here in the UK.

This statement sets out the Group's actions to understand all potential modern slavery risks related to its business and the steps in place aimed at ensuring there is no slavery or human trafficking in its business and its supply chains.

Supply Chain

This statement covers the activities of the Group headed by Westbrook Holdings Limited and all of its subsidiaries. It governs all of our business dealings and the conduct of all persons or businesses with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with the Group and/or any subsidiary of our Group, to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with our anti-slavery policy. We expect all suppliers to conduct business in a manner that respects human rights and to comply with all local, national and international laws and regulations including the prohibition of modern slavery.

We continue to operate a number of internal policies and practices to ensure we are conducting our businesses in an ethical manner. Our policies describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

Our anti-slavery policy sets out the Group's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help. The Group's whistleblowing policy ensures employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

We either carry out our own recruitment activities or only use reputable employment agencies to hire staff. We also carry out appropriate background checks including eligibility to work in the UK for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Awareness & Performance Indicators

We have created awareness of modern slavery issues by communications with all staff members by email.

All of our offers, purchases and sales are subject to our terms and conditions. These terms and conditions are referenced in email correspondence with all existing and prospective customers and suppliers and are available to view on our website. Our terms and conditions include a clause entitled "Compliance with Laws" which covers modern slavery to ensure our suppliers are aware and compliant with our anti-slavery policy.

Compliance

No reports were received from employees, the public, or law enforcement agencies to indicate modern slavery practices have been identified within our business activities during the last financial year.

The Group understands that modern slavery risk is not static, therefore we will continue to mitigate this risk during the current financial year to ensure our systems and controls continue to be effective in safeguarding against any form of modern slavery taking place within our business or our supply chain.

Approval

This statement was approved by the Board of Directors of the Westbrook Group on 06/01/2025