This document constitutes company policy of andwis lifts Limited (Registration No: 2487116). It is to provide relevant information and instructions to employees or information to andwis lifts Limited customers and suppliers. All Company Policies are stored on the IMS held on SharePoint

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MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Organisation: andwis lifts Limited (Formerly Classic Lifts Limited - Company Registration No: 2487116)

Financial Year Ending: 31st December 2025.

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for **andwis lifts Limited** (Registration No: 2487116) for the financial year ending **31/12/2025.**

1. Organisational Structure, Business and Supply Chains

andwis lifts Limited (Registration No: 2487116) is a specialist provider of lift installation, modernisation, refurbishment, servicing, and maintenance solutions operating across the United Kingdom, and is part of the wider andwis group of technical services companies. We employ over 300 direct personnel across our UK regional branches and operational centres, with an annual turnover exceeding the £36 million threshold under the Modern Slavery Act 2015.

Our supply chain primarily consists of:

- **Tier 1 Product & Component Suppliers:** Reputable UK and European manufacturers and distributors of mechanical, hydraulic, and electrical lift equipment, entrance systems, and replacement parts.
- **Specialist Subcontractors:** Vetted UK-based specialist engineering, scaffolding, electrical, and building works subcontractors supporting on-site installation and modernisation projects.
- **Corporate & Operational Services:** Providers of fleet vehicles, personal protective equipment (PPE), workwear, IT hardware, and facilities management services.

2. Our Policies in Relation to Slavery and Human Trafficking

We operate a zero-tolerance approach to modern slavery and human trafficking across our operations and supply chains. Our commitment is governed through our ISO 9001, ISO 14001, and ISO 45001 Integrated Management System (IMS) held on SharePoint, supported by the following core policies:

- **Anti-Slavery and Human Trafficking Policy (Company Policy No. 7):** Sets out our zero-tolerance stance, responsibilities, due diligence rules, and reporting procedures for all employees, agency workers, and business partners.
- **Whistleblowing Policy:** Encourages employees, subcontractors, and third parties to report any suspicion of unethical conduct or worker exploitation in good faith without fear of retaliation or victimisation.
- **Recruitment & Equal Opportunities Policies:** Ensure all direct recruitment is conducted fairly, transparently, and in strict adherence to UK employment legislation.
- **Supplier & Subcontractor Onboarding Controls:** Incorporate specific prohibitions against forced, compulsory, or trafficked labour within our commercial terms and conditions.

3. Risk Assessment and Management

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As part of our Integrated Management System governance, we assess where the potential risks of modern slavery and labour exploitation could arise:

Operational Area	Risk Level	Mitigation & Risk Management Controls
Direct Operations	Low Risk	Workforce consists of qualified engineers, technicians, apprentices, and professional support staff based exclusively in the UK. All staff undergo strict Right-to-Work verification, are paid directly into personal bank accounts at rates above the National Living Wage or recognised JIB apprentice rates, and work under robust UK health and safety standards.
Subcontracted Site Labour & Agency Workers	Medium Risk	Recognising that the wider construction and building services sector carries heightened risk regarding temporary or subcontracted site labour, we mandate that all subcontractors and labour agencies pass our pre-qualification vetting prior to site deployment.
Manufactured Components & Raw Materials	Medium Risk	While we procure finished lift assemblies and components from established UK and European Tier 1 suppliers, we recognise that raw materials, electronics, and PPE originate from global supply chains. We mitigate this by partnering with long-standing, accredited Tier 1 manufacturers who maintain their own robust ethical sourcing frameworks.

4. Due Diligence Processes and Remediation

To mitigate the risks identified above, we have embedded the following controls into our day-to-day operations:

- **Employee Verification & Fair Pay:** 100% of direct employees undergo mandatory UK Right-to-Work checks prior to commencing employment. All adult employees are remunerated above the UK Living Wage, and all trainees are remunerated in line with JIB apprentice rates.
- **Supplier & Subcontractor Pre-Qualification:** New and existing key suppliers and subcontractors are vetted via our Approved Supplier process, verifying their health, safety, quality, and ethical compliance (aligned with Constructionline Gold, CHAS, and SSIP standards).
- **Audit, Inspection & Remediation:** We reserve the right to audit key suppliers and subcontractors on a risk-assessed basis. Any suspected instance of modern slavery reported via our internal channels or the UK Modern Slavery Helpline (0800 0121 700) is investigated immediately by the Lift & Entrance Division Managing Director and HSEQ/Compliance team. We will require immediate corrective remediation or terminate commercial relationships with any partner found to have breached our Anti-Slavery Policy.

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5. Key Performance Indicators (KPIs) and Effectiveness

To monitor the effectiveness of our steps to prevent modern slavery during the financial year, we track the following performance indicators:

Target Metric	Performance Indicator	Status / Result
Induction Compliance	Percentage of new direct employees completing company induction including Policy No. 7 awareness.	**100%**
Workforce Verification	Percentage of direct employees undergoing verified UK Right-to-Work checks and paid above National Living Wage / JIB rates.	**100%**
Supplier Vetting	Percentage of newly onboarded critical Tier 1 suppliers and subcontractors completing pre-qualification vetting.	**100%**
Incident Reporting	Confirmed instances of modern slavery or human trafficking identified within operations or Tier 1 supply chain.	**Zero (0)**

6. Training and Capacity Building

Every new starter at andwis lifts Limited is briefed on our Anti-Slavery and Human Trafficking Policy (Policy No. 7) during their company induction. Operational managers, procurement personnel, and site supervisors are provided with guidance on recognising the warning signs of labour exploitation on-site and within the supply chain, as well as the escalation routes both internally and via the UK Modern Slavery Helpline (0800 0121 700).

7. Board Approval and Director Signature

This statement was formally approved by the Board of Directors of andwis lifts Limited (Registration No: 2487116) on 16/11/2026 and will be reviewed and updated annually.

Signed: *Kerry Sheehan*

Position: Lift & Entrance Division Managing Director

Last Review Date: 16/11/2026

Appendix A

Definition of Slavery and Servitude Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed using coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

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Definition of Forced or Compulsory Labour Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work, or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

Definition of Human Trafficking An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here:

http://www.legislation.gov.uk/ukpga/2015/30/section/3/enacted. Recent figures from the UK National Crime Agency (NCA), show that the most prominent exploitation type recorded for potential victims first exploited as a child (where this is known), was labour.