



Modern Slavery and Human Trafficking Policy

Wendling Beck Opco LLP

vAug-25

Review date: 01/08/2026

1. Policy statement

Wendling Beck is committed to preventing modern slavery, forced labour and human trafficking in all aspects of our activities and to acting ethically and with integrity in all our business relationships. We recognise our responsibility to take a robust approach to identifying, assessing and mitigating the risk of modern slavery within our operations and supply chains.

This policy reflects our values as a land-based, nature-led enterprise delivering environmental outcomes alongside commercial activity, and supports our wider commitments to responsible governance, environmental stewardship and social value.

2. Scope

This policy applies to:

- All employees, directors and officers of Wendling Beck;
- Contractors, consultants, agents and volunteers working on our behalf; and
- All suppliers and partners providing goods or services to Wendling Beck, including land management, ecological services, construction, infrastructure, professional services and operational support.

3. Our organisation and activities

Wendling Beck operates a large-scale landscape recovery and nature-based solutions project in Norfolk, delivering biodiversity net gain, nutrient mitigation, habitat creation and long-term land management. Our activities include ecological consultancy, habitat creation and management works, farming and grazing operations, construction and maintenance works, monitoring and professional services.

While we consider the overall risk of modern slavery within our direct operations to be low, we recognise that certain parts of our supply chain — particularly labour-intensive land management and construction activities — may carry a heightened risk and therefore require appropriate diligence and oversight.

4. Our commitment

Wendling Beck commits to:

- Complying with the Modern Slavery Act 2015 and all other applicable laws;
- Taking proportionate steps to identify and address modern slavery risks;
- Working with suppliers and partners who share our commitment to ethical labour practices;
- Acting transparently and responsibly where concerns are identified; and
- Continually improving our approach to managing modern slavery risks as our activities and supply chains evolve.

5. Responsibilities and governance

Overall responsibility for this policy rests with the Wendling Beck leadership team.

- The leadership team is responsible for approving this policy and ensuring it is implemented effectively.
- Managers and project leads are responsible for applying this policy in procurement, contract management and day-to-day operations.
- All individuals working for or on behalf of Wendling Beck are expected to comply with this policy and to report any concerns.

6. Risk assessment and due diligence

We take a risk-based and proportionate approach to modern slavery due diligence, which may include:

- Assessing modern slavery risks when appointing new suppliers or contractors;
- Giving particular attention to higher-risk activities such as construction, habitat works and seasonal or agency labour;
- Seeking assurances from suppliers that they comply with relevant labour laws and standards;
- Including appropriate contractual provisions requiring compliance with modern slavery legislation; and
- Monitoring supplier performance where appropriate and practicable.

We recognise that smaller local suppliers may not have formal policies in place. In such cases, we will take a pragmatic and proportionate approach, focusing on behaviours, working practices and transparency rather than purely documentary compliance.

7. Employment practices

Wendling Beck is committed to fair and lawful employment practices. We:

- Ensure that all employees have the legal right to work in the UK;
- Pay at least the National Minimum Wage or National Living Wage, as applicable;
- Do not tolerate forced, bonded or involuntary labour;
- Respect freedom of association and the right to collective bargaining; and
- Provide safe and healthy working conditions.

8. Reporting concerns (whistleblowing)

All employees, contractors and partners are encouraged to raise concerns about suspected modern slavery or unethical labour practices.

Concerns may be raised confidentially with a member of the Wendling Beck leadership team. We are committed to ensuring that anyone who raises a concern in good faith will not suffer any detriment or retaliation.

Where appropriate, concerns will be investigated sensitively and proportionately, and action will be taken to address any issues identified.

9. Training and awareness

We will ensure that relevant staff involved in procurement, contract management and operational delivery have an appropriate understanding of modern slavery risks and this policy.

Training and awareness activities will be proportionate to the scale and risk profile of our operations and may include briefings, guidance notes or informal training as appropriate.

10. Continuous improvement

Wendling Beck recognises that managing modern slavery risk is an ongoing process. We will:

- Review this policy periodically to ensure it remains appropriate and effective;
- Update our approach as our activities, supply chains and regulatory expectations evolve; and
- Engage constructively with partners and stakeholders to promote good practice.

11. Approval and review

This policy is approved by the Wendling Beck leadership team and will be reviewed at least annually, or sooner if there are significant changes to our activities or risk profile.

Approved by: Wendling Beck Leadership Team

Date: 01/08/2025