Wildstone

Modern Slavery

Annual Statement 2024

Philip Allard
WILDSTONE CAPITAL LIMITED | 05 JULY 2024

Introduction

This Statement is prepared on behalf of Whistler UK Bidco Limited and subsidiary group companies ("Wildstone Group"). At Wildstone, we are committed to upholding ethical and responsible business practices. As part of Wildstone's commitment to human rights and social responsibility, a Modern Slavery Policy was adopted in November 2023, to eradicate any form of modern slavery or human trafficking from our operations and supply chains. We believe in promoting transparency, fairness, and dignity for all individuals involved in our business, including employees, suppliers, contractors and partners.

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our contractors, suppliers and other business partners will hold their own suppliers to the same high standards.

Please send any written requests for information on this Statement to office@wildstone.co.uk and your request shall be responded to within the timeframes set out in the applicable law.

Regulatory Framework

The United Kingdom Modern Slavery Act came into effect in October 2015. This Act requires commercial organisations doing business in the UK that supply goods or services and have an annual turnover exceeding £36 million to publish an annual statement addressing the measures taken to mitigate the risk of modern slavery.

Oversight and Modern Slavery Policy

Environmental, Social and Governance matters, including human rights policies and procedures, are overseen by Wildstone's Board. Risk, including in relation to ESG matters, is overseen by the Senior Management Team.

Wildstone adopted its Modern Slavery Policy on the 10th November 2023. This is attached at Appendix 1.

Organisation Structure and Supply Chain

Wildstone Group is an outdoor media infrastructure business that acquires and rents property assets for outdoor advertising in the UK, Germany, Ireland, the Netherlands and Spain. Wildstone is in the process of setting up a company in Australia.

Wildstone procures goods and services from a limited supply chain in each of the countries it operates in, which can be summarised as follows:

- Professional services (ie lawyers, accountants, planning consultants etc);
- Contractors to install and maintain traditional and digital outdoor media infrastructure, power and associated works (eg hard and soft landscaping); and
- Suppliers of outdoor media infrastructure (ie digital screens and ancillary infrastructure and traditional outdoor infrastructure such as paper and paste panels)

Wildstone seeks to ensure that legal agreements with third parties require them to comply with applicable human rights, modern slavery and labour laws and we do not knowingly contract with suppliers engaged in any practice of child labour or human trafficking.

Risk Assessment and Management

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited and we procure goods and services from a restricted range of UK and EU based corporate suppliers. The only suppliers we use outside of the UK and EU our digital screen suppliers in China.

We have introduced a Pre-Qualification Questionnaire which all contractors that need to be completed. This includes questions on ESG such as modern slavery.

Training and Risk Awareness

Wildstone introduced training to raise awareness and ensure that all staff have a basic level of understanding of modern slavery and what to look for in their respective roles. For all existing staff, Wildstone rolled out basic training in Q1 in 2024 and that all new staff complete the training as part of their onboarding.

An independent whistle blower hotline for internal and external parties to alert Wildstone to risks including human rights abuses.

Due Diligence Processes

Wildstone has assessed the risk of modern slavery from our supply chain in the UK and EU to be low given the highly regulated nature of the environment in which Group companies are operating. Nonetheless, Wildstone has instigated a supplier questionnaire to understand the companies we are contracting with and the workers within our supply chain in order to assess risk at a company level.

The only major supplier not based in the UK or EU in our supply chain is our digital screen supplier that is based in Shenzhen, China. China has a vulnerability score of 46 (out of 100) based on the Walk Free global slavery index and the UN has identified widespread evidence of state-sanctioned modern slavery in Tibet and Xinjiang, China, homeland of the Tibetans and Uyghurs.

Wildstone's manufacturing partner is a private owned company based in Shenzen, China. Prior to entering into a manufacturing and supply agreement Wildstone undertook inspections of its manufacturing and workers facilities. Wildstone will be undertaking an inspection of the manufacturing facilities in Q4 2024. In addition, we have taken steps to ensure that the extended supply chain does not source components from regions in China with a higher risk of modern slavery or forced labour.

The due diligence steps undertaken by Wildstone has not identified any indications of modern slavery or forced labour in our supply chain.

Relevant Policies

Wildstone has adopted the following policies relevant to this statement:

- Modern Slavery Policy
- Whistleblowing Policy

Key Performance Indicators

We will continue to monitor working conditions in our supply chain through the following:

- Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking;
- Requiring staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK;
- Ensuring that consideration of the modern slavery risks and prevention are added to Wildstone's policy review process as an employer and procurer of goods and services;
- Continuing to take action to embed a zero tolerance policy towards modern slavery; and
- Requiring staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices

This Statement was prepared for the 2023 financial year and was approved at Wildstone's Board on the 27th June 2024.

Wildstone is not aware of any issues in its supply chain that contradict this Statement.



Philip Allard

Chief Operating Officer

27th June 2024