

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY AND STATEMENT

Womble Bond Dickinson (UK) LLP and Womble Bond Dickinson Wealth Limited (together referred to as "we", "us" or "our") are committed to acting ethically and with integrity in all our business relationships. We take a zero tolerance approach to slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It can take many forms including slavery, servitude, forced and compulsory labour and human trafficking. Each involves the deprivation of a person's liberty and exploitation for personal or commercial gain.

We comply with the Modern Slavery Act 2015 (**MSA**) and are committed to taking reasonable and practical steps to prevent modern slavery in our business and supply chains. We expect our suppliers, and their own supply chains, to comply with the MSA, follow good employment practices and comply with all relevant legislation and regulations in the countries in which they operate.

We are a signatory to the UN Global Compact, reflecting our commitment to internationally accepted principles on human rights, labour, the environment and anti-corruption. We also map our anti-slavery and human trafficking objectives against the UN Sustainable Development Goals (SDGs). We have identified the following SDGs as most relevant to this area and focus our efforts on them:

- **Goal 1:** No Poverty – paying a living wage, screening for forced labour, assessing supply chain risk.
- **Goal 4:** Quality Education – eradicating child labour, offering skills-based training, providing access to educational opportunities and promoting higher education.
- **Goal 10:** Reduced Inequalities – paying a living wage, employing non-discrimination practices in the workplace and creating an inclusive work environment.

Our business structure

Womble Bond Dickinson (UK) LLP is a leading UK law firm providing a comprehensive legal service across a wide range of business sectors from our offices in the UK.

Womble Bond Dickinson Wealth Limited is a wholly owned subsidiary of Womble Bond Dickinson (UK) LLP, providing regulated financial advice and services from our offices in the UK.

Womble Bond Dickinson (UK) LLP is a member of Womble Bond Dickinson (International) Limited, an international network of firms. Each member operates as a separate legal entity. This policy and statement relates solely to Womble Bond Dickinson (UK) LLP, its structure and supply chain, as Womble Bond Dickinson (UK) LLP procures products and services both on its own behalf and on behalf of Womble Bond Dickinson Wealth Limited.

We do not have intricate supply chains. Our suppliers are primarily UK based providers of goods, services or works to support day-to-day management of our offices and operations (**Operational Procurement**) and providers of services on behalf of clients, for example expert witnesses or counsel (**Legal Services Providers**).

Policies and procedures

We use these policies and procedures to help monitor and reduce the risk of modern slavery occurring within our business or our supply chains:

- our Ethical Framework;
- this Anti-slavery Policy and Statement;
- our Sustainable Procurement Policy;
- our Supplier Code of Conduct and Supplier Standards;
- our Responsible Business Policy and procedures; and
- our Reporting Breaches and Whistleblowing Policy and Procedure.

Steps for the prevention of modern slavery

Operational Procurement

In our efforts to monitor and reduce the risk of modern slavery occurring within our business and its supply chains, we:

- carry out a firm-wide risk assessment to determine the level of risk of modern slavery posed to our business;
- undertake periodic supplier risk assessments to identify areas of heightened risk and to inform our due diligence activities; and
- seek to identify, prevent and mitigate modern slavery risks through supplier due diligence, contractual controls, ongoing supplier engagement and periodic supplier reviews.

For those Operational Procurement suppliers with a spend of over £20,000 during the last financial year 2025/26, our annual supplier assessment considered supplier sector,

geography, workforce profile, turnover, supply chain characteristics, publicly available modern slavery disclosures and any adverse information identified through desktop research. This review covered 151 suppliers. Our assessment found that:

- no suppliers were assessed as presenting a high or medium risk of modern slavery;
- the majority of suppliers operated within sectors and jurisdictions generally considered to present a low risk of modern slavery;
- where suppliers were required to publish a modern slavery statement under the Modern Slavery Act 2015, published statements were reviewed and, where necessary, clarification or additional information was sought from the supplier; and
- a small number of suppliers were identified for follow-up enquiries where statements or supporting information were not readily available.

Based on this assessment we have concluded that the risk of modern slavery occurring within our business and its supply chain is low.

We use the results of these annual supplier assessments as a key measure of the effectiveness of our modern slavery controls. These findings support our conclusion that our current policies, due diligence procedures and supplier engagement activities remain effective and proportionate to the level of risk presented by our business and supply chain.

Legal Services Providers

We have procedures in place governing how we procure services for clients. We expect high standards of integrity and professionalism from our service providers, and expect them to comply with all applicable statutory requirements, and share our commitment to ethical considerations.

Employment practices

We adopt robust recruitment processes. All our employees have the necessary documentation to legally work in the UK, are

paid at least the Real Living Wage and have reached school leaving age.

Further actions

Our Sustainable Procurement Policy is designed to ensure that we engage suppliers who align with our ethical standards.

Our major suppliers are required to comply with our Supplier Code of Conduct, which includes commitments:

- not to engage in or tolerate any form of human trafficking or modern slavery;
- to comply with all applicable anti-slavery laws and human trafficking laws and regulations; and
- to implement due diligence procedures to ensure there is no slavery or human trafficking in their supply chains.

We have set ourselves the following key performance indicators for the next 12 months:

- continue to ensure that all new employees receive information during induction on modern slavery risks, indicators and reporting channels;
- complete an annual modern slavery risk assessment of operational suppliers with whom annual spend exceeds £15,000;
- ensure that those responsible for supplier procurement and supplier due diligence undertake an annual review of modern slavery risks, supplier due diligence processes and developments in modern slavery reporting requirements.

We will assess any instances of non-compliance with our Supplier Code of Conduct on a case-by-case basis and will tailor remedial action appropriately. This remedial action may result in us deciding not to establish a relationship with a new supplier or the termination of our relationship with an existing supplier.

Training, responsibility for and compliance with this policy

Support teams involved in procurement have been trained to enable them to identify the risks of modern slavery and to report concerns. Training has also been provided to legal teams who might come across modern slavery in client supply chains.

We use our induction programme for new staff and annual refresher information for existing staff to raise and maintain awareness of the risks of modern slavery in our business and supply chains and the importance of reporting any concerns.

The Board of Womble Bond Dickinson (UK) LLP has overall responsibility for ensuring that this policy complies with our legal and ethical obligations. Our General Counsel has day-to-day responsibility for implementing and monitoring the effectiveness of this policy and will review it annually.

We encourage all staff working for and with us (including employees, consultants, contractors and agency workers) to report any concerns about modern slavery in any part of our business or in our supply chains in accordance with our Reporting Breaches and Whistleblowing Policy and Procedure.

This policy does not form part of any employee's contract of employment so may be amended from time to time.

Statement

This policy sets out the steps which we have taken and are continuing to take to ensure that slavery and human trafficking is not taking place in any part of our UK business or supply chains. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Womble Bond Dickinson (UK) LLP (and its wholly owned subsidiary, Womble Bond Dickinson Wealth Limited) for the financial year ending 31 March 2026.

This policy and statement was approved by the Board of Womble Bond Dickinson (UK) LLP on behalf of its members on 16 September 2026. A copy of this statement was signed by Paul Stewart, Managing Partner, on behalf of the Board and published on our website at www.womblebond dickinson.com/modern-slavery

This policy and statement was signed by:

A handwritten signature in black ink, appearing to read 'P. Stewart', with a stylized flourish at the end.

Paul Stewart Managing Partner

womblebond dickinson.com