MODERN SLAVERY POLICY

POL2023.03 Dated 1st May 2025

What is Modern Slavery?

Modern slavery is an umbrella term that covers the offences of human trafficking and slavery, servitude and forced or compulsory labour, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. It is a highly complex and hidden crime that is a violation of fundamental human rights. The UK Government has estimated there are 13,000 victims of modern slavery in the UK and the number is increasing.

Modern slavery refers to situations of exploitation that a person cannot leave due to coercion, use of force, abuse of vulnerability, deception or other means. It is the illegal exploitation of people for personal or commercial gain and is a violation of fundamental human rights. Modern slavery is an umbrella term that encompasses a wide spectrum of crime, including:

- **Slavery**
  Ownership of another person as personal property.
- **Servitude**
  Complete control over a person short of owning them.
- **Forced and compulsory labour**
  Work performed involuntarily due to the threat of punishment.
- **Child labour**
  Illegal or exploitative work performed by a child.
- **Human trafficking**
  Movement of people without their consent for the purpose of exploiting them.
- **Bonded labour**
  Forced work to repay a debt.

The Modern Slavery Act 2015

In 2015 the Modern Slavery Act was passed, requiring all companies with a turnover of more than £36 million operating in the UK to publish an annual slavery and human trafficking statement outlining their approach to identifying and eradicating slavery in their supply chains. While the risks of modern slavery in A N Wallis's direct activities are likely to be low, there are potential risks of modern slavery through the goods and services we procure that can be linked to supply chains around the world.

What is A N Wallis & Co Ltd doing?

The Company has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

It is a key priority for us to ensure we trade ethically, source responsibly and work to prevent modern slavery and human rights issues throughout our organisation and in our supply chain.

We are also committed to ensuring our transparency and approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

MODERN SLAVERY POLICY

POL2023.03 Dated 1st May 2025

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

As part of this, we will ensure that:-

- Our workers have the freedom to terminate their employment with the Company
- Our workers have a freedom of movement
- Our workers have freedom of association
- We will prohibit any threat of violence, harassment or intimidation towards any member of staff.
- We will prohibit the use of worker-paid recruitment fees
- We will prohibit compulsory overtime.
- Prohibit the employment of persons under the minimum legal age.
- We will prohibit discrimination of any kind.
- We will prohibit the confiscation of worker's original identification documents
- We will provide access to remedy, compensation and justice for victims of modern slavery.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Over time, staff at various levels of the business will undergo awareness training on this subject, the effectiveness will also be monitored to ensure that this correct balance of training is provided across the business.

This policy does not form part of any employee's employment contract and we may amend it at any time.

Responsibility for the policy

The Company is responsible for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply.

The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they effectively counter modern slavery.

Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways to improve it. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

You must avoid any activity that might lead to or suggest a breach of this policy. You must notify your line manager OR a Company Director as soon as possible if you believe or suspect a conflict with this policy has occurred or may occur.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may happen, you must notify your line manager or company Director.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they are mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

You should inform your line manager immediately if you believe you have suffered any such treatment. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

Communication & awareness of this policy

Training on this policy and the risk our business faces from modern slavery in its supply chains forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

For and on behalf of A N Wallis & Co Ltd

Christopher Brown

Christopher Brown (May 19, 2025 13:23 GMT+1)

C Brown
Managing Director
1st May 2025

POL2023.03 Modern Slavery

Final Audit Report 2025-05-19

Created:	2025-05-19
By:	Simon Sorsby (simon.sorsby@an-wallis.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAk4tWviNXqhWb0IX6_vluS5bOCUeF3aKR

"POL2023.03 Modern Slavery" History

Document created by Simon Sorsby (simon.sorsby@an-wallis.com)
2025-05-19 - 7:18:08 AM GMT

Document emailed to Christopher Brown (chris.brown@an-wallis.com) for signature
2025-05-19 - 7:18:12 AM GMT

Email viewed by Christopher Brown (chris.brown@an-wallis.com)
2025-05-19 - 12:15:13 PM GMT

Document e-signed by Christopher Brown (chris.brown@an-wallis.com)
Signature Date: 2025-05-19 - 12:23:13 PM GMT - Time Source: server

Agreement completed.
2025-05-19 - 12:23:13 PM GMT