

Modern Slavery Act Statement

Pursuant to s.54 of the Modern Slavery Act 2015

This statement is made on behalf of the WPA Group, including WPA World Class Services (India) Pvt Ltd, WPA Protocol Plc and the WPA Healthcare Practice Plc.

WPA is a leading UK private medical insurer, also offering cash plans and third-party administration of Healthcare Trusts. The WPA Group's suppliers are almost exclusively UK based. Less than 1% of the Groups total expenditure takes place outside of the UK. As at the 31 December 2025 the WPA Group had 470 UK employees and 84 employees in India. The WPA Group adheres to all applicable laws in the jurisdictions where it operates and is a signatory to the Real Living Wage in the UK, ensuring fair payment of our own staff and of the staff of suppliers under our direct control.

Since the introduction of the Modern Slavery Act 2015, the WPA Group has taken the following steps to ensure slavery and human trafficking does not occur within our organisation or in our supply chain:

- Appointed the Chief People Officer supported by the Chief Executive to be responsible for anti-slavery and human trafficking, and publicised this appointment across the WPA Group and its supply chain;
- Produced a Modern Slavery Policy which applies to the WPA Group and all those within our supply chain. This Policy is formally adopted by the Board annually, thereafter it is distributed to all staff;
- Undertaken annual risk assessments, and sought confirmations of compliance with the Modern Slavery Act 2015 from a number of our suppliers, in particular those in the lower paid sectors, where we have high spend or are based overseas where local legislation may differ;
- Made confirmation of compliance with the Modern Slavery Act 2015 a prerequisite for both new suppliers to WPA and upon renewal of contracts with existing suppliers, where there is a more than remote risk of modern slavery;
- Made consideration of Modern Slavery risks a prerequisite when authorising capital expenditure;
- Established a framework for organisational accountability, to allow for employees and others to raise issues, make suggestions, voice grievances and report suspected or actual slavery or human trafficking. As at the date of this Statement, none have been received;
- Raised awareness amongst our staff and managers across the WPA Group: as to the risks of slavery and human trafficking; on the requirements of the Modern Slavery Act 2015; and its objectives together with our procedures to ensure compliance.

KEY RISK INDICATORS (KRIs)

The following indicators help us monitor modern slavery risks within our business and supply chains.

- Period in the year the Modern Slavery Policy has been in force – 12 months.
- Number of reports/concerns raised in relation to Modern Slavery in the last 12 months – nil
- Number of suppliers who have provided us with their modern slavery statement when asked to do so – 100%

- Number of suppliers identified as being higher risk – 4 (predominantly due to their employees being paid the minimum wage. WPA have requested that salary's be increased to the real minimum wage)
- Number of UK WPA employees subject to pre-employment checks to verify age and their legal right to work in the UK – 100%
- Number of UK WPA employees who have received Modern Slavery awareness training – 100%
- Red flags identified by payroll in relation to pay being paid to a different person - nil
- Level of expenditure outside the UK where the risk is higher - Less than 1%
- Modern slavery concerns or red flags identified during procurement exercises carried out in the year - nil
- There have been no concerns or red flags raised during WPA's procurement exercises.

Effectiveness of Our Approach - Statement

We consider the effectiveness of our modern slavery approach by assessing whether our actions lead to meaningful reductions in risk, stronger supplier practices, and improved protection for workers across our operations and supply chain. Our focus is on outcomes and behavioural change rather than activity counts alone. We believe that by maintaining stakeholder awareness, and vigilance over our transactions the risk of Modern Slavery in our supply chain has been reduced.

In summary, we remain committed to ensuring there is transparency in our business and in our supply chain, and we expect the same standards from our suppliers and service providers. This applies to all persons who work for us in any capacity, including agency workers and business partners.

This statement was approved by the Board on the 26 March 2026.

Nathan Irwin
Chief Executive
26 March 2026