



Since 1974

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

WGC has been a leading provider of housekeeping and cleaning services to the hospitality industry throughout the UK for over 50 years. With a team of over 7,000 employees working across client properties in both the UK and Germany, WGC remains firmly committed to preventing modern slavery and human trafficking in all aspects of its operations.

We operate with a zero-tolerance approach to slavery and human trafficking and have taken concrete steps to identify and mitigate risks within our business. This statement outlines the actions WGC has taken to understand and address all potential modern slavery risks and the procedures we have implemented to eliminate such practices from our business.

WGC is committed to preventing acts of modern slavery and human trafficking within its business. Due to very limited procurement activity and no onward supply chain, we have fewer exposure risks in this area.

WGC Structure

WGC operates across multiple sectors within the hospitality and support services industries, including:

- Hotel Housekeeping
- Education Sector Cleaning
- Window and Specialist Cleaning Services

To deliver on our client contracts, WGC provides labour directly to clients, ensuring that all team members and partners adhere to policies designed to eradicate any form of modern slavery or human trafficking. WGC operates extensively across the UK and Germany, servicing a diverse client base ranging from large corporates to smaller enterprises, all of whom are expected to share our ethical standards.

Each operational location is managed by experienced professionals who uphold WGC's core policies and report through a clear structure to Operations Directors and the CEO.

Our procurement is minimal, restricted to chemicals, equipment, and sundries. All suppliers are reputable UK-based companies. In line with our environmental commitments, we prioritise sourcing environmentally friendly products wherever possible.

Our Clients

WGC builds relationships of trust and transparency with all clients, underpinned by mutual accountability. We undertake due diligence on each client, considering:

- Reputation and ethical standing
- Legal compliance
- Health, safety, and environmental performance

WGC is continually enhancing its policies and procedures to ensure that it only works with clients who operate to the ethical standards that WGC expects.

We welcome client audits of our practices, including those related to modern slavery, and encourage open dialogue on improvements and expectations.

To date, WGC has not received any allegations of human trafficking or modern slavery concerning any client. If such a situation were to arise, WGC would take immediate action, including notification of appropriate authorities.

Employee Training and Whistleblowing

We actively engage our workforce on important issues, including modern slavery, through a variety of tools and channels:



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- Intranet platform ("Central"): Promotes awareness, policy updates, and guidance
- E-learning modules: Cover topics including modern slavery and are mandatory for all employees
- Regular updates: Policies are reviewed annually, and employees are informed of any changes

Senior national management receive quarterly briefings and training on all aspects of modern slavery and human trafficking to maintain awareness and oversight.

WGC also maintains a confidential People Helpline (People@wgc.ltd.uk), accessible to all employees with a guaranteed response within 12 hours. This channel allows safe and anonymous whistleblowing, ensuring employees can report any concerns without fear of retaliation.

Risk Assessments

Over the past 12 months, WGC has taken the following proactive steps to manage and mitigate modern slavery risks:

- Underwent audits by major clients
- Identified potentially vulnerable groups within our workforce
- Conducted internal site audits every 4 weeks across all locations
- Paid employees directly into personal bank accounts
- Issued employment contracts with clear and fair notice periods
- Prohibited any request for surrender of passports or work permits

We have not received any allegations of modern slavery or trafficking within our organisation during the reporting period.

Policies and Compliance

- WGC maintains and annually reviews a comprehensive suite of policies to ensure compliance with legal and ethical standards, including:
 - Modern Slavery Policy – Outlines our commitment to preventing modern slavery and human trafficking within our operations.
 - Disciplinary, Grievance, and Appeal Policy – Ensures fair, transparent, and accessible procedures for all employees.
 - Code of Conduct – Sets out the expected standards of behaviour and ethical practices for all employees and partners.
 - Whistleblowing Policy – Provides a secure and confidential mechanism for reporting concerns without fear of retaliation.
 - Recruitment and Selection Policy – Ensures that all hiring processes are fair, transparent, and compliant with employment laws, preventing exploitation.
 - Equal Opportunities and Diversity Policy – Promotes an inclusive workplace free from discrimination and harassment.
 - Health and Safety Policy – Ensures a safe working environment for all employees, reducing vulnerabilities that can be exploited.

These policies are regularly communicated to employees through training, internal communications, and are readily accessible on our intranet platform. Regular audits and reviews ensure that they remain effective and aligned with evolving best practices and legal requirements.

Awareness and Communications

WGC promotes awareness through:

- Posters and materials in every operational location, translated into multiple languages to ensure accessibility for all employees
- Regular internal communications on Central and the WGC Hub, accessible to all staff, featuring updates, guidance, and policy reminders
- Mandatory training modules and refresher courses on modern slavery, human trafficking, and ethical



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workplace practices

- Team briefings and toolbox talks led by management to reinforce key messages and encourage open dialogue
- Inclusion of modern slavery awareness in new employee inductions to ensure early understanding of company values
- Periodic employee surveys and feedback channels to gauge understanding and identify areas for improvement
- Collaboration with external experts and NGOs to provide additional resources and awareness campaigns

These efforts help embed a culture of vigilance and responsibility, empowering employees at all levels to identify and report any concerns related to modern slavery or unethical practices.

This statement was last updated on 1 April 2025 and has been approved by the Board of Directors of WGC UK & DE.

A full copy of WGC's Modern Slavery and Human Trafficking Policy is available upon request.