

Modern Slavery Statement 2026

Financial year ended 31 May 2026

WCF Ltd is committed to conducting business ethically and responsibly. We do not tolerate slavery, servitude, forced or compulsory labour, human trafficking or any other form of exploitation in our operations or supply chains. This statement explains the steps we have taken, and the improvements we intend to make, to identify and address modern slavery risks.

This statement is made under section 54 of the Modern Slavery Act 2015 and covers WCF Ltd and the businesses it controls for the financial year ended 31 May 2026.

Our business and supply chains

WCF is a long-established, partly employee-owned group operating in the United Kingdom. We employ approximately 350 colleagues across a diverse group of businesses. Our principal activities are:

- fuel distribution to domestic, agricultural and commercial customers
- mail order and e-commerce retailing of clothing
- e-commerce fulfilment services
- online retailing of lawn, horticultural and amenity products
- leisure parks providing camping, glamping and holiday accommodation
- retailing of pet, equestrian and smallholder supplies

Our direct operations are based in the UK. Our supply chains vary by business and include fuel and lubricant suppliers, clothing and product manufacturers, wholesalers, logistics providers, labour providers, contractors, technology suppliers, professional services and facilities support. Some goods sold by our retail businesses are manufactured or sourced outside the UK, which can create longer and less transparent supply chains.

Governance and responsibility

The WCF Board has overall responsibility for this statement and for oversight of our approach to modern slavery. Day-to-day responsibility is shared by the leaders of our trading businesses and the their respective procurement teams. Business leaders are expected to identify relevant risks, raise concerns and support proportionate due diligence within their areas.

We expect colleagues, suppliers and business partners to act lawfully, treat people fairly and provide safe working conditions. Concerns should be raised promptly through a line manager, the People team or WCF's confidential reporting arrangements.

Policies and standards

Our approach is supported by policies and procedures that promote ethical conduct and fair treatment. These include our Anti-Corruption and Bribery Policy and Equality Policy, together with our recruitment, employment, health and safety, grievance and reporting arrangements.

We expect suppliers and contractors to comply with applicable employment, human rights and health and safety laws. Where relevant to the risk, we expect them to maintain

appropriate controls to prevent forced labour, human trafficking and worker exploitation in their own operations and supply chains.

Risk assessment

We assess risk by considering the nature of the goods or services, the location and complexity of the supply chain, the use of temporary or migrant labour, subcontracting, and the degree of visibility available beyond a direct supplier. Our current priority areas include:

- clothing and other goods manufactured or sourced through international supply chains
- agricultural, horticultural and commodity-based products where seasonal or migrant labour may be used
- transport, warehousing, cleaning, maintenance and other outsourced services that can involve subcontracted or temporary labour
- suppliers operating in countries or sectors associated with weaker labour protections or limited supply-chain transparency

A higher level of risk does not mean that modern slavery is occurring. It means that stronger enquiry, evidence and ongoing oversight may be appropriate.

Supplier due diligence

WCF seeks to work with reputable suppliers and, where practical, contracts through established UK businesses. Our major suppliers' published modern slavery statements are reviewed where applicable, and we maintain dialogue with suppliers about their controls and working practices.

The nature and depth of checks are proportionate to the risk and may include reviewing a supplier's modern slavery statement and relevant policies, seeking information about manufacturing locations and labour arrangements, clarifying the use of subcontractors, and requiring remedial action where concerns arise. We will not knowingly continue a relationship where a supplier refuses to address a credible risk or serious breach.

Responding to concerns

Any indication of modern slavery will be treated seriously and escalated promptly. Our first priority will be the safety and welfare of any person who may be at risk. WCF will seek appropriate specialist advice and, where necessary, contact the relevant authorities or the Modern Slavery and Exploitation Helpline. We will consider the possible effect on victims before changing or ending a supplier relationship, because immediate termination can sometimes increase harm.

WCF will keep appropriate records of concerns, decisions and actions. Retaliation against a colleague who raises a genuine concern in good faith will not be tolerated.

Training and awareness

Business leaders have been provided with guidance on the Modern Slavery Act and the policies that support this statement. We will continue to improve awareness among colleagues whose roles involve procurement, recruitment, supplier management or the supervision of outsourced workers, with emphasis on recognising warning signs and knowing how to report a concern.

Effectiveness and priorities for 2026 and 2027

WCF will monitor progress through practical measures that improve visibility and accountability. During 2026 and 2027, our priorities are to:

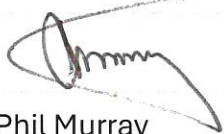
- confirm ownership of modern slavery risk within each trading business
- review and document the risk profile of key suppliers and higher-risk categories
- strengthen supplier onboarding and contract wording where proportionate
- refresh guidance for relevant managers and colleagues
- record concerns raised, investigations completed and remedial actions taken
- review progress annually and identify further improvements for the next statement

Our effectiveness will be assessed by the completion and quality of these actions, rather than by the absence of reported concerns alone.

Approval

This statement was approved by the Board of WCF Ltd on [insert Board approval date].

Signed



Name

Phil Murray

Position

Chief Executive and Director

Date

September 2026