Modern Slavery Policy

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1. PURPOSE

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This document sets out the policy of WINSHAW Group with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain.

This policy's use of the term "modern slavery" has the meaning as given in the Act.

2. SCOPE

WINSHAW Group has a zero-tolerance approach to modern slavery.

WINSHAW Group is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery does not occur in its business or organizations interacting within WINSHAW.

3. RESPONSIBILITY

The officers at WINSHAW are responsible for the implementation of this policy.

4. STEPS FOR PREVENTION

WINSHAW is committed to ensuring transparency in its business and in its approach to tackling modern slavery throughout the supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. WINSHAW expects the same standard to be adopted by its contractors, suppliers and the suppliers of WINSHAW suppliers.

Notwithstanding the statutory obligations on WINSHAW, in relation to modern slavery, it is acknowledged that WINSHAW does not control the conduct of individuals and organizations in the company's supply chain. To underpin our compliance with practical steps, WINSHAW intends to implement the following measures:

a) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery;
b) engage with suppliers regarding modern slavery to understand the measures taken to ensure modern slavery is not occurring in their businesses and their supply chain;
c) introduce supplier pre-screening and self-reporting for suppliers on safeguarding controls;
d) introduce contractual provisions for suppliers to confirm adherence to this policy and acceptance of the company's right to audit.

5. MODERN SLAVERY STATEMENT

- WINSHAW is committed to opposing and preventing modern slavery in all its forms Our attitude to modern slavery is zero tolerance.
- The company has reviewed its existing compliance and risk management processes following the introduction of the Modern Slavery Act 2015 to determine to what extent protection measures already exist, and what further measures may be required in any part of our business or in our supply chain.
- WINSHAW supports and respects the protection of human rights within its sphere of influence and, in particular, the effective elimination of compulsory labor and child labor alike.
- The company's Code of Business Conduct governs all WINSHAW business dealings and the conduct of all persons or organizations with whom it contracts directly or who is appointed to act on its behalf.
- WINSHAW is committed to communicating this policy regularly and encouraging employees to report any concerns relating to compliance with the policy to their line manager, the Director of QHSE and HR or any member of the company's Business Ethics Committee.

David Shaw
Chief Executive Officer

REV Date MAR 22, 2025