

ANTI-SLAVERY POLICY

1. POLICY STATEMENT

- 1.1 Modern slavery is the severe exploitation of other people for personal or commercial gain, including forced and compulsory labour. Modern slavery is a crime and a violation of human rights.
- 1.2 WCS Commercial operate a zero-tolerance approach with regards to modern slavery and have implemented a system that ensures modern slavery is not taking place within our own business and also in any of our supply chain.
- 1.3 This policy applies to all associated parties working for us or on our behalf, and is applied at all levels of business – directors, officers, agency workers, volunteers, interns or anyone associated with WCS Commercial.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The Managing Director(s) have overall responsibility for ensuring that the policy complies with our legal obligations, and that all those under our control comply with it.
- 2.2 The compliance team, comprised of the Managing Director and HSQE Manager will work together to ensure that this policy is upheld across all our operations and will ensure that any breaches or concerns are addressed.
- 2.3 The HSQE Manager has primary day-to-day responsibility in ensuring this policy is implemented within both our supply chain and those directly employed by WCS, dealing with any queries about it and auditing internal control systems; to ensure they are effective in countering modern slavery.

3. COMPLIANCE WITH THE POLICY

- 3.1 All persons working for WCS Commercial must ensure they have read and understand the policy and comply with it.
- 3.2 All persons working for WCS Commercial must ensure they avoid any activity that might lead to, or suggest, a breach of this policy. The prevention and detection of modern slavery in any form is the responsibility of all persons working for WCS Commercial.
- 3.3 WCS Commercial encourage all persons working for them to raise any concerns about modern slavery and all persons working for WCS Commercial are assured that they will not serve any adverse consequences for reporting genuine concerns over suspected business wrongdoing.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 This policy will be communicated to all WCS Commercial employees

4.2 All WCS Commercial employees are required to communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and supply chain.

5. DUE DILIGENCE

5.1 In order to implement our zero-tolerance approach, we have systems in place to ensure that all our employees and our supply chain implement our policy.

6. BREACHES OF THIS POLICY

6.1 Any breach of this policy will be treated as gross misconduct and may result in dismissal without notice.

6.2 We may terminate our relationship with individuals and organisations working on our behalf if they do not comply with this policy