



22. Anti-Slavery Statement

Reviewed By: Melissa Munnich

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22.1 Background

Modern slavery is a crime and a violation of fundamental human rights. It encompasses various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking—all involving the deprivation of a person's liberty for exploitation. Woodhurst has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships. We aim to implement effective systems to ensure modern slavery is not taking place within our business or supply chains, aligned with our ethical commitments under the Modern Slavery Act 2015.

Whilst we are not legally required to publish an annual statement, Woodhurst voluntarily pursues transparency in addressing modern slavery risks. We expect high standards from our contractors, suppliers, and other business partners. Our contracting processes include specific prohibitions against forced or trafficked labour, or any forms of slavery or servitude, and we encourage our suppliers to uphold the same high standards within their own supply chains. This policy applies to all persons working for us or on our behalf, including employees, directors, officers, agency workers, volunteers, contractors, and business partners. This policy is not part of any employee's contract of employment, and we may amend it at any time.

22.2 Responsibility

Woodhurst holds overall responsibility for ensuring compliance with this policy and maintaining alignment with our ethical commitments. Primary responsibility

lies with the Operations lead (Alex Bywater) to implement and monitor this policy, address queries, and ensure our internal controls are effective against modern slavery risks. Management at all levels is responsible for ensuring that staff reporting to them understand and comply with this policy and that they receive adequate guidance on the issue of modern slavery in our supply chains. We welcome feedback on this policy and encourage comments, suggestions, and queries to be directed to the Operations lead.

22.3 Compliance

All individuals working for or with us are expected to read, understand, and comply with this policy. Preventing, detecting, and reporting modern slavery within our business and supply chains is a shared responsibility. Staff should avoid any activity that may suggest a breach of this policy and must report any suspicions or known conflicts with this policy to their line manager or a company director. Concerns may also be raised following our Public Interest Disclosure (Whistleblowing) Policy, which ensures confidentiality and protection for those reporting issues.

In instances where we identify risks of modern slavery within our supply chains, we are committed to supporting our suppliers to address and correct any coercive, abusive, or exploitative practices. If any individual is uncertain about whether an action, treatment of workers, or condition within our supply chains constitutes modern slavery, they should consult their line manager or a company director. We encourage openness and will support those who raise concerns in good faith, even if they turn out to be unfounded. We are committed to ensuring no one suffers detriment as a result of reporting a suspicion of modern slavery.

Detrimental treatment includes dismissal, disciplinary action, or other unfavourable responses resulting from raising a concern. If you believe you have been subjected to such treatment, inform your line manager promptly. If the issue is not resolved, employees may raise it formally using our Grievance Procedure, detailed in the employee handbook.

22.4 Communication & Awareness

Awareness of this policy and of modern slavery risks forms part of our induction for relevant employees, and updates are provided through our established communication channels. Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors, and business partners at the outset of our relationship with them and reinforced as needed.

22.5 Breaches

Any employee found to be in breach of this policy will face disciplinary action, potentially leading to dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.