

Witt Group UK Services Limited acknowledges and accepts its legal responsibilities, as prescribed by The Modern Slavery Act 2015

DEFINITIONS

The Company considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

RESPONSIBILITY FOR THE POLICY

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Quality, Health and Safety Manager has the day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

COMMITMENT

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under the relevant employment legislation.

SUPPLY CHAINS:

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values and operate a transparent business.

POTENTIAL EXPOSURE

In general, the Company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING:

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery. In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:

- We limit the geographical scope of our operations to the UK, Ireland and Europe
- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour
- With regards to national or international supply chains, our point of contact is preferably with a UK or Ireland company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have systems in place to encourage the reporting of concerns and the protection of whistle blowers

MEASURES:

We use the following measures to check how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Right to work checks completed at recruitment stage;
- Ensure minimum employment age adhered to, in line with the relevant legislation;
- Always apply national minimum wage thresholds, in line with the relevant legislation;
- Regular contact with material suppliers including their understanding of, and compliance with, our expectations.
- Over the next 12 month we aim to Make our staff aware of the Modern Slavery Act 2015, including the definitions of slavery and human trafficking.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of our regular training programme and will be updated as necessary.

CORPORATE SOCIAL RESPONSIBILITY:

The Company operates a corporate social responsibility policy which incorporates its stance on modern slavery.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

SLAVERY COMPLIANCE

All identified persons must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all employees or those under our control. They are required to avoid any activity that might lead to, or suggest, a breach of this policy.

They must notify a manager or the compliance as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If employees believe or suspect a breach of this policy has occurred or that it may occur they must notify a manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with a manager.

The Company aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If employees believe that they have suffered any such treatment, they should inform the QHSE Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Any employee who breaches this policy will face disciplinary action, which could result in 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.

The Company has a Quality, Safety, Health and Environmental Manager, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Company obligations in this regard. This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged.

Signed 
Name: Paul Rennison

Date 14th January 2026
Position: Quality Health and Safety Manager