

MODERN SLAVERY

Modern Slavery is a crime which occurs in many forms and for the purpose of this policy includes any act of slavery, servitude, bonded, forced or compulsory labour, child labour or human trafficking. All of these acts are normally conducted for the purposes of either personal or commercial gain and without exception result in the abuse and exploitation of an individual's human rights.

Walter Lilly & Company Ltd is fully committed to the eradication of Modern Slavery in all its forms and as a Company we will not engage in, nor will we condone or tolerate, any act of Modern Slavery within any aspect of our operations.

As a Company we will act transparently, ethically and with integrity both internally and across all of our business relationships. Appropriate action will be taken in response to any identified act of Modern Slavery and the processes and control measures we implement in support of this policy aim to prevent, in so far as we are able, the opportunity for acts of Modern Slavery to arise.

Our approach to Modern Slavery, including our control measures, is contained within our supporting procedures. However as a minimum we will:

- Identify and prioritise which if any parts of our business and Supply Chain are at most risk of Modern Slavery so that we can focus on those areas
- Communicate our commitment to our Supply Chain using the Preorder procurement process and the Contractor Qualification Questionnaire and engage with them, as appropriate, to understand the measures being taken by them to ensure that Modern Slavery is not occurring within their business.
- If there is a perceived risk, introduce and implement appropriate due diligence activities which enable us to confirm, to the fullest extent possible, that Modern Slavery is not occurring within our Supply Chain
- Prepare and publish on our Company website an annual Modern Slavery and Human Trafficking Statement which details the steps being taken to support the prevention of Modern Slavery within our business and our Supply Chain
- Through appropriate communication raise employee awareness of Modern Slavery

All employees, temporary workers, or subcontract employees, who perform work at any site or location operated by Walter Lilly & Company Ltd will be required to conform fully to the requirements of this policy and its supporting procedures. This includes reporting any suspected act of Modern Slavery identified within the workplace to either their Line Manager or the HR Team for investigation/action.

This policy will be reviewed annually, as a minimum, to ensure its continued effectiveness.



Managing Director | Walter Lilly