

MODERN SLAVERY AND HUMAN TRAFFICKING

Modern Slavery can occur in many forms. For the purpose of this policy, modern slavery includes any act of slavery, servitude, bonded, forced or compulsory labour, child labour or human trafficking. All of these acts are conducted for either personal or commercial gain and result in the abuse and exploitation of an individual's human rights. Walter Lilly remains fully committed to the eradication of modern slavery in all its forms and as a Company we do not engage in, nor do we condone or tolerate, any act of modern slavery within any aspect of our operations.

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

Our approach to preventing modern slavery, which includes communicating this policy and a series of control measures, is contained within our supporting procedures. As a minimum we will:

- I. 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
- II. Communicate and demonstrate our commitment to our supply chain using the Preorder procurement process and the Contractor Qualification Questionnaire. Engage with our supply chain as appropriate, to understand what measures they are taking to ensure that modern slavery is not occurring within their business or their own supply chain.
- III. If there is suspicion of modern slavery or even a perceived risk, introduce and implement appropriate due diligence activities to enable us to confirm, to the fullest extent possible, that modern slavery is not occurring within our supply chain.
- IV. 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
- V. Through appropriate communication raise employee awareness of modern slavery.

All employees, temporary workers, or subcontract employees, who work at any site or business 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 immediate investigation/action.

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

C. Butler

Chris Butler | Managing Director