

Anti-slavery and human trafficking policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

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 or any other individual's contract, although the potential consequences for failure to comply with its terms are set out below. HR Wallingford will review this policy and may amend it at any time and all employees will be informed of any amendments to this policy in writing.

Responsibility for the policy

The Board of HR Wallingford in place from time to time (the "Board") 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 CEOs have primary and 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.

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

Compliance with this policy

You must ensure that you 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 those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You 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 you 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 your manager or the CEOs.

If you believe or suspect that a conflict with this policy or a breach of this policy has occurred, or may occur in the future, then you should raise your concerns in accordance with our Whistleblowing Policy available from the Personnel Manager.

We 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 you believe that you have suffered any such treatment, you should inform a member of the Board. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which is available from the Personnel Manager, alternatively you should write to a Board director.

Communication and awareness of this policy

A copy of this policy will be provided to all employees and they will be invited to raise any questions that they have in respect of its application. All new employees will be provided with a copy of this policy as part of the induction process. All employees are required to complete mandatory e learning training on modern slavery and human trafficking, and renew the training on an annual basis. This training forms part of the Company's ongoing commitment to raising awareness, supporting the identification of risks, and ensuring compliance with this policy.

The Board has had training on modern slavery and will keep under review whether further training is required for other employees of the business in due course.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We are committed to ensure that all suppliers have confirmed that they will comply with the terms of this policy or that they can demonstrate a similar or greater commitment to eliminating the risk of modern slavery in their business and their own supply chain. If suppliers are unable to satisfy this requirement by that time then no further payments shall be made to them.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct without notice or any payment in lieu of notice.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy or fail to confirm they will comply with its terms.

Territory

This policy has been prepared principally with reference to the laws of England and Wales, but the Company is committed to compliance with the laws and regulations of all jurisdictions in which it operates. This policy shall accordingly be read and interpreted, as far as is possible, so that it is line with the applicable legal jurisdiction and the Company reserves the right to depart from the terms of this policy as may be necessary to comply with legal requirements.

Ridha Bentiba

Chief Executive Officer (Joint), HR Wallingford Ltd

Signed:



Date: 09 July 2026

Review date: 09 July 2027