

Policy: Modern Slavery and Human Trafficking Policy

1. SUMMARY

- 1.1. This policy defines WINNS Services Modern Slavery and Human Trafficking Policy to ensure it meets requirements.
- 1.2. The Operations Director is responsible for implementation and management of the Modern Slavery and Human Trafficking Policy

Rev.	Date	Nature of Changes	Approved By
1	27 February 2018	Original issue.	C Stebbing
2	7th September 2021	General Update	C Stebbing

2. POLICY: Modern Slavery and Human Trafficking Policy

3. INTRODUCTION

WINNS Services is committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within WINNS Services.

As part of the companies due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the Operations Managers upon request.

This policy statement will be reviewed annually and published.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007. The implementation and operation of this

management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.