

Wilmington plc Modern Slavery Act Transparency Statement

This statement is made in accordance with the Modern Slavery Act 2015 and reflects our commitment to acting ethically and with integrity in all our business relationships. Due to the impact of Coronavirus and pressure on resources, the publication of this statement was delayed by a few days in line with the six month extension granted by the UK Government.

Wilmington plc takes a zero-tolerance approach to any kind of modern slavery within its operations and supply chains. As a professional services organisation, we consider the risk of modern slavery existing within our business to be low. We are not complacent, however. No sector or industry is risk-free. Each of us has a responsibility to be alert to the risks, however small, of modern slavery in any part of our business or supply chains. Staff are expected to report concerns, using the appropriate reporting channels and management are expected to act upon them.

Organisational structure and supply chains

Wilmington plc comprises of trading companies that operate in offices that are based in many different countries and jurisdictions. These companies provide networking, information and education services to our communities across the globe.

In doing so, Wilmington relies on a number of suppliers from around the world. We anticipate that with some potential suppliers, their daily operations may not necessarily be conducted according to the ethical and legal standards prevalent in the UK. This necessitates careful evaluation of such suppliers; which Wilmington plc is committed to undertaking.

Commitment

The organisation is committed to ensuring there is no slavery or human trafficking in its supply chain or in any part of its business. It complies with all applicable employment legislation relating to pre-employment checks that identify the right to work, employee terms and conditions, including pay, and the organisation invests in supporting the health and wellbeing of its staff.

Relevant policies

The organisation operates the following policies that support its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations. These policies apply across all group companies and in all countries:

- **Anti-Bribery and Corruption Policy (“ABC”):** The organisation recognises potential links between bribery and corruption and modern slavery. The organisation has a robust ABC policy which is communicated to its employees and associated persons (for example consultants and agency staff).
- **Whistleblowing policy:** The organisation encourages its employees and associated persons and business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise

to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. The whistleblowing procedure can be found on the corporate website (<https://www.wilmingtonplc.com/investors/corporate-governance>)

- **Employee code of conduct:** The organisation's values make clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating in the UK and abroad and managing its supply chain.
- **Recruitment/Agency workers policy:** The organisation uses only specified, reputable employment agencies to source employees/temporary staff members and always verifies the practices of any new agency it engages before accepting workers from that agency.

Due diligence

In line with its responsibilities under the Modern Slavery Act 2015 the organisation undertakes formal and informal supplier selection procedures across all its activities and maintains vigilance of its supply chain. Violation by a supplier of its responsibilities in preventing modern slavery is likely to lead to the termination of the business relationship between the supplier and Wilmington plc.

Training

Employees are requested to undertake online ABC training which includes information on organisational and employee responsibilities under the Modern Slavery Act 2015, and how to report concerns.

Board approval

This statement has been approved by the organisation's Board of Directors, who will review and update it periodically, as appropriate.

January 2021