

## Wilmington plc Modern Slavery Act Transparency Statement

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and reflects our commitment to acting ethically and with integrity in all our business relationships. It describes the actions taken by Wilmington plc and its subsidiaries (together, the “Group”) during the financial year ending 30 June 2023 to prevent modern slavery and human trafficking within its business and supply chain.

### 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. During the year ended 30 June 2023 Wilmington plc was accredited as a Living Wage Employer in the UK by the Living Wage Foundation, demonstrating a further commitment to fair pay for all, extending to third party contracted staff. Whilst the accreditation is specific to the UK workforce, the commitment to fair pay is reflected across its operations globally.

### 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 a range of data and information, and training and education solutions to our communities across the globe.

Due to its international operations, 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.

The core services procured by the group are professional services and those related to the effective operation of our office premises. These core services are supplied via short supply chains, which facilitates good visibility of the standards upheld by such suppliers in relation to treatment of workers and potential risk of modern slavery and human trafficking.

### 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. Enforcement of these policies is achieved through a combination of mandatory training and active policy acceptance, with responsibility for adherence being assigned to management at all levels. 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.
- **Supplier code of conduct:** The organisation's procurement policy mandates that all suppliers accept the supplier code of conduct before being engaged for service provision. The supplier code of conduct clearly defines the actions and behaviours expected of suppliers in their own operations to ensure that the highest standards of business practice are adhered to.
- **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. This approach is supported by the commitments made by the organisation as an accredited living wage employer.

## 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.

## Risk

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. In accordance with the Group's whistleblowing policy, staff are encouraged to report concerns, using the appropriate reporting channels and management are expected to act upon them.

Modern slavery related risk within the operations and supply chains of the Group, together with associated mitigating actions, are considered as an integral part of the Group's formal risk management process. Within the Group's assessment of principal risks and uncertainties, the impact of modern slavery is considered as part of the management of three principal risks:

People; Remoteness of operations and globalisation; and Reputational risk. Full details of the Groups formal risk management arrangements can be found in the latest annual report available on the corporate website (<https://wilmingtonplc.com/investors/reports-and-presentations>).

### **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.

December 2023