

BRADFORD WATTS

MODERN DAY SLAVERY

INTRODUCTION:

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Bradford Watts Ltd., we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. BWL do not use convict/prison labour; indentured, forced, compulsory, slave, bonded and underage labour. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year.

Our business and supply chains

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and robust on-boarding PQQ procedure includes due diligence of the supplier's reputation, processes, respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the appropriate authorities.

Risk assessment

Annually, we conducted a PQQ review and risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index.
- The business services rendered by the suppliers.
- The presence of vulnerable demographic groups.
- A news analysis and the insights of labour and human rights groups.

This PQQ assessment will determine our response and the risk controls that we implement.

Version:	07
Created:	15/01/2026
Review Date:	15/01/2027

Policies

Bradford Watts Ltd. operate the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Purchasing Code - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

Supplier due diligence

Bradford Watts Ltd. conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals.

This includes:

- Assessing risks in the provision of particular services.
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts.
- Requiring improvements to substandard employment practices.
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

We require all suppliers to attest that:

- They do not use convict/prison labour; indentured, forced, compulsory, slave, bonded and underage labour.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.
- They do not require employees to post a deposit/bond and do not withhold their salaries for any reasons.
- They do not require employees to surrender their passports or work permits as a condition of employment.

Awareness

Bradford Watts Ltd. has raised awareness of modern slavery issues by putting up posters across our facilities, providing internal training for all key/appropriate staff via our training partners, iHasco, and sending an iHasco platform internal email of our Modern Day Slavery Policy to all operatives to read and download for their records that is focused specifically on modern slavery, which explains:

- Our commitment in the fight against modern slavery.
- Red flags for potential cases of slavery or human trafficking.
- How employees should report suspicions of modern slavery.

Version:	07
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Training

Bradford Watts Ltd. operate an awareness programme, for all employees and will be rolling this out to coversupplier contacts, which covers:

- Various forms of modern slavery in which people can be held and exploited.
- The size of the problem and the risk to our organisation.
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices.
- How employees should respond if they suspect slavery or human trafficking.
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people withintheir own organisation.
- What external help is available for the victims of slavery?
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls?
- What steps Bradford Watts Ltd. will take if a supplier fails to implement anti-slavery policies orcontrols?
- An attestation from employees that they will abide by Bradford Watts anti-slavery policy.

Measuring how we are performing

Bradford Watts Ltd. has defined a set of key performance indicators and controls to combat modern slaveryand human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?
- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivityto ethical issues?
- What are the findings of our cross-functional Human Rights team, which reviews how we areaddressing modern slavery and human trafficking?

This statement covers 11/06/2024 to 11/06/2025 and has been approved by D. Pitcher, BWL MD.

D. Pitcher. MD



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