

Modern Slavery and Human Trafficking Policy

1. Introduction

WintWire, is committed to operating responsibly, establishing and adhering to the highest ethical standards. This policy outlines our stance on modern slavery and human trafficking, reinforcing our commitment to preventing these heinous crimes within our business operations and supply chains.

2. Policy Statement

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. WintWire. has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity in all our business dealings and relationships.

3. Scope

This policy applies to all individuals working for WintWire. 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.

4. Our Commitments

- **Compliance with Legislation:** We comply with all relevant local and international laws regarding modern slavery and human trafficking, including the UK Modern Slavery Act 2015.
- **Risk Assessment:** We conduct regular risk assessments of our business operations and supply chains to identify areas where the risk of modern slavery and human trafficking may be prevalent.
- **Supplier Due Diligence:** We implement robust due diligence processes for all new and existing suppliers, ensuring that they share our commitment to preventing modern slavery and human trafficking.
- **Training and Awareness:** We provide training to all employees to help them understand the signs of modern slavery and human trafficking and the importance of complying with this policy.
- **Reporting and Whistleblowing:** We encourage all employees, suppliers, and business partners to report any concerns related to modern slavery and human trafficking.
- **Remediation:** If any instances of modern slavery or human trafficking are identified, we will act promptly to address the issue and provide support to the affected individuals.

5. Responsibilities

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- **Board of Directors:** The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- **Managers:** Managers are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on the issue of modern slavery in supply chains.
- **Employees and Contractors:** Employees and contractors must avoid any activity that might lead to, or suggest, a breach of this policy. They are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.

6. Monitoring and review

This policy will be reviewed annually by the Board of Directors to ensure its effectiveness and relevance. Any necessary improvements will be made and communicated to all employees and stakeholders.

7. Reporting Concerns

Employees, suppliers, and business partners can report concerns about modern slavery or human trafficking in the following ways:

- **Email:** b.turner@wintwire.co.uk
- **Postal Address:**
Admin
Wintwire
Oxspring Wiremills
Oxspring
Sheffield
S36 8YW

All reports will be taken seriously and investigated promptly and thoroughly.

8. Communication and Awareness

This policy is communicated to all employees, suppliers, and business partners and is available on the WintWire Ltd. website. Awareness of this policy and the importance of preventing modern slavery and human trafficking is promoted throughout the organization.

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9. Breaches of this Policy

Any breaches of this policy may result in the termination of our relationship with any person/persons or organisations found to have been in breach.

Approved by:

Ben Turner
Managing Director
12/07/24

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