

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY



1. OVERVIEW

WP Group is committed to protecting our employees, partners and the company from illegal or damaging actions by individuals or groups, either knowingly or unknowingly. Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

2. PURPOSE

Based throughout the South of England, WP Group and its subsidiary Airport Energy, is an integrated fuels and services company. With sustainability at its core, the Company work alongside customers and supply partners to identify and deliver measurable efficiency savings and long-term solutions.

The group has its head office in the UK and all of its sites and offices are also in the UK.



3. OUR SUPPLY CHAINS

Our supply chain includes the supply of principally related to the provision of fuels.

4. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

5. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk –

- Where viable, we run our own sites to ensure optimum control of the work environment;
- We limit the geographical scope of our own sites to ensure optimum supervision of the use of our properties;
- Where possible we build long standing relationships with local suppliers and customers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our contact point is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt ‘one-up’ due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain;
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

6. SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

The Senior Management are responsible for compliance in their respective departments and for their supplier relationships.

7. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff.

8. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Supplier and Customer Questionnaires;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations;
- Our recruitment methods for employees cover the right to work in the UK.



9. REFERENCES

- Dignity at Work Policy
- Equal Opportunities Policy

This Policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

This Anti-slavery and Human Trafficking Policy will be reviewed at least annually and revised as necessary to reflect changes to the business activities and any changes to legislation. Any changes to the Policy will be brought to the attention of all employees. This policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request.

Darren Borrás
Business Unit Director
November 2023

