

Modern Slavery and Human Trafficking Statement

Introduction

We are, and will continue to be, committed to ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own employees and suppliers to the same high standards.

Definitions

Modern Slavery – the recruitment, movement, harbouring, or receiving of human beings through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.

Human Trafficking – the arranging or facilitating of travel of another person with a view to that person being exploited.

Commitments

Woodley Equipment Company Ltd. expects everyone working for us, with us, and on our behalf to respect, support and uphold the following commitments to safeguard against modern slavery and human trafficking:

- We have a zero-tolerance approach to modern slavery within our organisation and our supply chains.
- The prevention, detection, and reporting of modern slavery in any part of our organisation is the responsibility of everyone working for us, or on our behalf.

Employees must not engage in, facilitate, or fail to report any activity which might lead to, or suggest, a breach of our Modern Slavery and Human Trafficking Policy.

- We are committed to engaging with all third-parties who work with us, for us, or on our behalf to address the risk of modern slavery in our operations and supply chain.
- We establish a relationship of trust and integrity with all our suppliers. Our supplier selection process includes due diligence of the supplier's reputation, respect for the law, and compliance with health, safety, and environmental standards.
- We encourage all employees, clients, and suppliers to report any suspicion of modern slavery or human trafficking without a fear of retaliation.
- We strive to maintain the highest standards of employee conduct and ethical behaviour when operating within the business and when representing the business externally.

- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and human trafficking in our contracts with third-parties. We may also require employment and recruitment agencies, and suppliers engaging workers through a third-party to agree to specific prohibitions against modern slavery and human trafficking.
- As part of our risk-based approach, we will consider whether the circumstances warrant us carrying out an audit of third-party suppliers for their compliance with our Modern Slavery and Human Trafficking policy.
- If we find that employees, or individuals and organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach, to terminating such relationships, or taking legal action.