

WINN & COALES INTERNATIONAL LTD and subsidiaries

MODERN SLAVERY POLICY STATEMENT

For the year ended 30 June 2020

We have a zero-tolerance approach to modern slavery and human trafficking and are committed to ensuring that participants in our supply chain, our customers or any part of our business do not utilise or benefit from modern slavery or human trafficking. This annual policy statement is part of our commitment to act ethically and with integrity in everything we do and in all our stakeholder relationships. We have implemented internal controls, policies and systems around our interactions with suppliers, customers and employees to ensure continued compliance with our required standards.

Suppliers

Relationships with suppliers have generally been developed over many years and, in particular with SME suppliers, there is a good understanding of their activities and close business relationships with their management. Larger suppliers and service providers are well known reputable businesses with similar policies on ethics and integrity.

Before taking on a new supplier, a detailed due diligence is carried out which includes:

- a review of their supplier approval process;
- assessment of financial stability and resilience;
- obtaining information on production, handling, storage and delivery;
- identifying and assessing potential risk areas;
- an assessment of environmental and ethical issues, including the suppliers modern slavery policy;
- obtaining references from other customers as to the prospective suppliers suitability.

We regularly review existing suppliers to ensure their continued suitability. Should we become aware of any supplier practices that we consider to be contrary to our standard of ethics and integrity and that we consider to be participation in modern slavery and human trafficking, we will immediately cease to utilise the supplier and will take the necessary legal action.

Customers

As with suppliers, we have had long term business relationships with most of our customers and have a good understanding of their businesses and management. Before supplying a

new customer, a due diligence process is also carried out which includes steps to ensure they are not associated with modern slavery and that they follow similar standards of ethics and integrity. Customers are monitored and regularly reviewed to ensure that they continue to apply acceptable business practices.

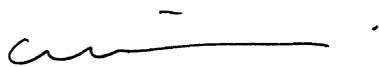
Employees

We are committed to the fair treatment and a high standard of health and welfare for all our employees and temporary staff. We ensure that they are fairly remunerated and are able to work in a safe, healthy and supportive environment, free from discrimination, abuse and exploitation.

As part of our recruitment processes, we perform background checks on prospective employees and contract workers to confirm their identity and ensure that they have the required citizenship or work permits. We also ensure that we are fully compliant with all taxation and regulatory requirements.

We offer staff opportunities for personal development and career progression. We regularly review salary and wage levels to ensure they are compliant with legislated and industry standards and reward excellent personal performance. We also have a employee incentive scheme where staff are rewarded for outstanding personal and company performance.

Staff interacting with suppliers and customers have been trained in the awareness and identification of modern slavery and whistle-blowing protection policies are in place.



Christopher Winn
Director