

MODERN SLAVERY STATEMENT

wanzl



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WZL-HR-0014

WANZL UK GROUP



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Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Wanzl Ltd and its subsidiary, Wanzl (Ireland) Ltd, for the financial year ending 2025.

This statement applies to all relevant group entities meeting the requirements of the Act, including those with an annual turnover exceeding £36 million.

Modern slavery remains a serious global issue, encompassing slavery, servitude, forced or compulsory labour, and human trafficking. Wanzl Ltd recognises its responsibility to prevent modern slavery within its operations and supply chains and is committed to acting ethically, transparently, and responsibly.

This statement has been prepared with regard to the UK Government's updated statutory guidance on transparency in supply chains (March 2025 and December 2025), which places increased emphasis on detailed disclosure, measurable impact, and continuous improvement.

Our Business and Supply Chains

Wanzl Ltd operates within the manufacturing and supply sector and engages with a wide range of suppliers, contractors, and stakeholders across multiple jurisdictions, including the UK, Ireland, the EU, and other global sourcing regions.

Our supply chain includes:

- Direct (Tier 1) suppliers providing goods and services
- Indirect suppliers supporting logistics, distribution, and facilities
- Labour providers, including temporary and agency workers

We recognise that certain areas present higher inherent risk, particularly:

- Use of temporary or agency labour
- Lower-tier supply chains where visibility is more limited
- Sectors involving manual or low-skilled labour

We are continually improving our supply chain mapping beyond Tier 1 and are transparent about areas where further visibility is required, in line with current government expectations.

Policies and Governance

We maintain a robust governance framework to support ethical business practices and prevent modern slavery.

Key policies include:

- Supplier Code of Conduct
- Anti-Slavery and Human Trafficking Policy

- Whistleblowing Policy
- Recruitment & Selection Policy

All policies are reviewed regularly to reflect legal updates and evolving best practice. Responsibility for modern slavery compliance rests with the Board of Directors. Day-to-day responsibility is delegated to the Operations Director, supported by HR and senior leadership teams. Oversight includes regular reporting on risks, incidents, and mitigation activities.

Risk Assessment and Due Diligence

We adopt a risk-based approach to identifying and addressing modern slavery risks across our operations and supply chain.

Our due diligence processes include:

- Verification of identity and right-to-work checks for all employees
- Strict prohibition on withholding personal documentation
- Supplier onboarding processes including modern slavery questionnaires
- Contractual provisions requiring compliance with anti-slavery laws
- The right to audit suppliers and labour providers
- Risk-based audits of sites, particularly those using agency labour
- Ongoing monitoring of higher-risk geographies and sectors

We recognise that failing to identify risks may indicate insufficient due diligence and are committed to increasing scrutiny, transparency, and reporting of findings.

Supplier Engagement and Controls

We actively engage with our suppliers to ensure alignment with our standards:

- Suppliers must adhere to our Supplier Code of Conduct
- Modern slavery clauses are embedded within supplier contracts
- Suppliers may be required to provide evidence of their own due diligence processes
- Non-compliance is addressed through corrective action plans, with escalation where necessary

We aim to work collaboratively with suppliers to improve standards rather than immediately disengaging, unless serious violations occur.

Training and Awareness

We provide training to ensure employees understand modern slavery risks and their role in preventing it.

- Training is delivered at induction and refreshed annually
- All employees receive awareness training
- Managers in higher-risk areas receive enhanced, role-specific training
- Training includes practical scenarios to support identification and response

We continue to enhance our training approach to ensure it drives meaningful awareness and action, not just compliance.

Worker Engagement and Reporting

We support open and safe channels for raising concerns:

- Anonymous whistleblowing system (accessible via the Wanzl website)
- Direct reporting to HR or management
- Clear escalation pathways
- “Stronger Together” materials displayed in multiple languages at all relevant sites

We are committed to ensuring that all workers, including agency staff, have access to reporting mechanisms and understand their rights.

Remediation and Victim Support

Where modern slavery risks or incidents are identified, we adopt a victim-centred approach, prioritising the safety and wellbeing of affected individuals.

Our approach includes:

- Engaging with relevant authorities and specialist organisations
- Supporting affected individuals where appropriate
- Ensuring no recruitment fees are charged
- Taking corrective action with suppliers
- Avoiding abrupt termination of supplier relationships where this may negatively impact workers

This approach aligns with UK Government guidance encouraging responsible and proportionate remediation.

Effectiveness and Key Performance Indicators (KPIs)

We measure the effectiveness of our approach through the following KPIs:

- 100% completion of mandatory employee training
- Percentage of suppliers assessed for modern slavery risk
- Number and outcome of supplier/site audits
- Number of concerns reported and resolved
- Progress in supply chain mapping beyond Tier 1

Future Targets (2026–2027)

- Increase audit coverage of high-risk suppliers
- Enhance supply chain mapping beyond Tier 1 suppliers
- Introduce more advanced risk assessment tools
- Expand role-specific training for higher-risk functions

These measures reflect a commitment to continuous improvement and measurable impact, as encouraged by updated guidance.

Continuous Improvement

We are committed to strengthening our approach each year by:

- Reviewing policies and procedures annually
- Incorporating stakeholder feedback
- Aligning with international standards such as the UN Guiding Principles on Business and Human Rights
- Increasing transparency in reporting both risks and actions

Transparency and Accessibility

This statement is published on our website with a prominent link from the homepage and is made available to all employees and stakeholders.

We also support transparency through publication on relevant government reporting platforms where applicable.

Approval

This statement was approved by the UK Group Board of Directors on 29th June 2026.

Signed:

A handwritten signature in blue ink, appearing to read "D. Rolland". The signature is fluid and cursive.

Dean Rolland
Managing Director
Wanzl Ltd