

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial Year Ending 31 December 2025

BOARD APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes WSH International Investments Limited's slavery and human trafficking statement for the fiscal year ending 31 December 2025. It was approved by WSH's Board of Directors.

This statement covers entities within the WSH Group of companies that meet the threshold requirements of the Modern Slavery Act 2015; WSH International Investments Limited and its principal UK trading subsidiaries.

1. OUR BUSINESS

WSH International Investments Limited ('WSHII' or "WSH") is the parent company for a group of leading, premium catering and hospitality businesses. Founded over 25 years ago, WSHII is the UK's largest independent contract catering company for business and industry, education and events, with a growing presence across Europe. Each day, our team of approximately 30,000 people serves millions of customers across around 4,000 locations, from client restaurants and coffee shops to school lunch halls and hospitality suites.

OUR OPERATING BRANDS

WSH operates through a family of independently run, entrepreneurial brands, each serving distinct client segments:

Business & Industry Catering

- BaxterStorey: Chef-led catering across offices and industry sites in the UK, Ireland, France, Belgium, Netherlands and Norway
- BM Caterers: Specialist contract catering
- Genuine Dining Company: Premium workplace dining
- MRS: France-based business and industry catering
- Meyers: Denmark-based catering and events

Education Catering

- Holroyd Howe: Premium catering for independent schools
- Caterlink: Specialist catering for state schools and local authorities

Leisure & Consumer

- Searcys: Premium restaurants, bars and events at iconic venues
- Benugo: Cafés and restaurants at cultural attractions
- Notes Coffee: Independent specialty coffee
- Musiam: France-based museum and cultural venue catering

Hospitality & Facilities

- South West Larder: Catering and soft-service provision across the UK's largest infrastructure project
- Portico: Front-of-house and concierge services
- Amplify Guest Services: Specialist guest experience services

OUR OPERATING MODEL

WSH operates a decentralised model in which each of our brands retain their own identity, leadership team and operational autonomy. Central functions; Legal, Finance, People, Procurement, Technical, IT and ESG, provide frameworks, policies, governance and support. This model gives our brands the agility to respond to client needs whilst benefiting from the scale, expertise and governance infrastructure of the Group.

Our procurement model combines central leverage on pricing and standards with local flexibility, enabling chefs and operators to source fresh, seasonal and locally appropriate ingredients while adhering to group-wide ethical and sourcing standards. A hybrid procurement approach secures strong terms with suppliers while ensuring our people retain the freedom to select what best fits their menus and clients.

OUR WORKFORCE

WSH employs approximately 30,000 people across seven countries; the United Kingdom, Ireland, France, Belgium, the Netherlands, Denmark and Norway. UK and Ireland represent the majority of our workforce. Our teams span a wide range of roles including chefs, front-of-house, operations management, support functions and specialist services.

Our workforce is diverse in background and experience. Approximately 38% of management development programme participants are female, and we continue to work towards a greater gender balance across leadership roles and are committed to fair and decent work; including progressing Real Living Wage accreditation across our businesses, and to creating inclusive workplaces where everyone can thrive.

Our sector is characterised by a high proportion of part-time and flexible roles, shift work and seasonal employment, which creates particular considerations for worker welfare that are addressed through our policies, training and supplier standards described in this statement.

OUR STRATEGY AND ESG COMMITMENT

WSH's sustainability strategy, 'Second Nature', provides a clear, evidence-based framework for how we address climate, nature, inclusion and supply chain resilience across our family of businesses. Second Nature aligns with recognised international standards including the Global Reporting Initiative (GRI), UN Sustainable Development Goals (SDGs) and the Sustainability Accounting Standards Board (SASB), and prepares us for reporting aligned with the European Sustainability Reporting Standards (ESRS).

In 2025, WSH completed a Double Materiality Assessment engaging over 120 internal and external stakeholders. Modern slavery and human rights was identified as a material topic, confirming the importance of continued focus in this area.

Alignment with UN Guiding Principles on Business and Human Rights (UNGPs)

WSH's approach to human rights is grounded in the UN Guiding Principles on Business and Human Rights (UNGPs) and connected to the UN Global Compact (UNGC), of which WSH is a signatory. Our practical implementation of these principles is reflected in:

- A clear commitment by the WSH Board and ESG Committee to respect human rights throughout our operations and supply chain
 - Continuously improving our Human rights due diligence across our supplier onboarding, risk assessment and audit processes
 - Access to remedy through our Whistleblowing Policy and partnership with Unseen UK's Modern Slavery Helpline
 - Transparency through annual reporting on progress against commitments, including this statement
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2. OUR POSITION

At WSH, we are clear about our responsibility to prevent slavery and human trafficking. We maintain a zero-tolerance approach to all forms of modern slavery; forced labour, debt bondage, human trafficking, child labour and any form of exploitation both within our own operations and across our supply chain.

We recognise that zero tolerance does not mean zero engagement. Where risks or concerns are identified, our approach is collaborative and remedial first; working with suppliers and partners to address issues whilst maintaining the right to terminate relationships where substantive non-compliance persists or is concealed. We want everyone; whether they work within our business or across our supply chain, to feel safe to raise concerns, confident that they will be addressed responsibly and without retaliation.

Human rights are fundamental to how we operate. Continued global instability; including conflict, climate-driven displacement and cost of living pressures, raises the risk of exploitation in supply chains. Labour shortages in the hospitality sector also create additional vulnerability. This statement outlines the steps taken during the financial year ending 31 December 2025 to prevent slavery and human trafficking in our operations and supply chains.

3. GOVERNANCE

WSH recognises that strong governance is essential for identifying and addressing modern slavery risk. Executive-level ownership and Board accountability are central to our approach.

Board Accountability

Modern slavery strategy is developed and overseen by our Environmental, Social and Governance ('ESG') Committee. The ESG Committee meets quarterly and reports to the main WSH Board. It is chaired by a WSH Board member and includes senior functional leaders representing People, Procurement, Legal, Finance and Sustainability as well as Brand CEO's and MD's.

ESG Committee Structure

The ESG Committee oversees the Second Nature sustainability strategy through four working pillars, each led by a senior functional manager or Director and sponsored by a WSH Board member:

PILLAR	FOCUS AREA	RELEVANCE TO MODERN SLAVERY	BOARD SPONSOR
Step Up	Climate action, environmental impact	Supply chain resilience and environmental human rights	WSH Board Member
Progressive Partnerships	Responsible sourcing, ethical supply chain	Primary pillar for modern slavery risk management	WSH Board Member
Inclusion by Design	Inclusive workplaces, gender equity	Fair and decent work standards for own employees	WSH Board Member
Nurturing & Growing Talent	Training, development, wellbeing	Awareness, training and whistleblowing culture	WSH Board Member

Modern slavery is a permanent agenda item for the ESG Committee. In 2025, topics discussed included the City of London's external review of the WSH 2024 Modern Slavery Statement, ESG legislative developments

including CSRD (Corporate sustainability reporting directive) and TISC (Transparency in Supply Chains guidance), gender pay gap progress and broader human rights topics arising from the Double Materiality Assessment.

Third-party subject matter experts are regularly invited to share insights with the ESG Committee, covering topics including modern slavery, inclusion and diversity, and carbon literacy.

4. POLICIES AND PROCEDURES

WSH adheres to internationally recognised human rights principles. Our policies are underpinned by the following standards:

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights (UNGPs)
- Core International Labour Organisation (ILO) Conventions
- Ethical Trading Initiative (ETI) Base Code
- UN Global Compact (WSH is a signatory)
- National and international law in all territories of operation

Core Human Rights Principles in Practice

The following principles guide how we protect and respect human rights across our operations and supply chain:

- Employment is freely chosen — no forced, bonded or involuntary labour
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid, with progressive improvement towards Real Living Wage accreditation
- Working hours are not excessive
- No discrimination is practised
- Right to an effective remedy is upheld
- Regular employment is provided wherever possible
- No harsh or inhumane treatment is permitted

Key Policies

The following policies underpin WSH's approach to preventing modern slavery:

POLICY	WHAT IT COVERS	HOW WE ENSURE COMPLIANCE
Modern Slavery Policy	Standards for ethical trading, zero-tolerance approach, responsibilities of employees and suppliers	Shared during supplier onboarding; required annual acknowledgement by employees in higher-risk roles
Supplier Code of Conduct (SCoC)	Minimum standards for all WSH supplier partners covering labour, environment, anti-corruption and modern slavery	Mandatory signature for all strategic and valued partner suppliers as part of onboarding; SCoC edition 2.0 launching H1 2026
Whistleblowing Policy	Confidential reporting mechanism for concerns; links to Unseen UK helpline	Available to all employees; suppliers notified of reporting routes; WSH Board trained on application

Recruitment Policy	Fair and legal hiring including right-to-work checks, prohibition on recruitment fees, inclusive hiring practices	Annual review; specific training for HR and general managers; sector-specific module for education (safeguarding requirements)
Anti-Bribery and Corruption Policy	Prohibition of corrupt practices in procurement and contracting	Shared as part of onboarding; reviewed annually

Core policies are shared as part of the onboarding process, requiring active confirmation of receipt and compliance where relevant, with annual refreshers required in specific cases. Policies are stored on a central SharePoint platform accessible to all employees.

As approved by the Risk Committee in April 2026, WSH is developing a standard set of core policies (including those that are legally required, represent best practice, or are regularly required by our clients) to be launched under a new framework ('The Standard') from September 2026, with policies stored on a central hub. These will be approved by the WSH Board and then by the board of each operating brand, and reviewed at least every two years.

Supplier Policy Expectations

We expect all suppliers to comply with our Modern Slavery policy, Supplier Code of Conduct, Whistleblowing policy and applicable national laws. We require suppliers to:

- Implement a due diligence process within their own operations to focus on identifiable risks of, or human trafficking and preventative measures, including in relation to personnel obtained via recruitment agencies
- Ensure any subcontractor or supplier contracts also include human trafficking provisions meeting WSH's requirements
- Maintain a published Modern Slavery Statement where required to do so by law, and share this with WSH
- Be registered on SEDEX (Supplier Ethical Data Exchange) with a completed Self-Assessment Questionnaire (SAQ)

5. OUR SUPPLY CHAIN

WSH has an extensive UK supply chain of over 3,500 suppliers, of which circa. 200 are considered as Tier 1, 2 ("Strategic") suppliers. Almost all are based in the UK, although across the wide range of products and services provided, a number of products are sourced from Europe and further afield for reasons of seasonality, availability and provenance.

Supply Chain Structure and Scale

Our supply chain is deliberately decentralised, reflecting our operating model. Procurement secures strong terms and sets minimum standards, while local operators retain the freedom to select from approved suppliers to best serve their clients and menus. This hybrid approach supports:

- Fresh, seasonal and regional sourcing
- Local vendor support and SME inclusion
- Reduced dependency on any single provider
- Specialist routes to market in fresh produce, meat and dairy

Our supply chain spans food, beverage and non-food goods and services (GNFR — goods not for resale), including packaging, uniforms, equipment, cleaning services, waste services, technology, temporary staffing agencies and professional services. Each category carries its own risk profile, and our approach to due diligence is proportionate to that risk.

Proportionality and Zero Tolerance

Our zero-tolerance approach to modern slavery means that we do not knowingly work with any supplier or partner engaged in practices that constitute modern slavery, forced labour, child labour, human trafficking or any related form of exploitation. Where such practices are identified or credibly alleged, we will take prompt action.

However, we recognise that zero tolerance must be implemented proportionately and intelligently. Our supply chain is complex and geographically diverse; requiring every supplier to meet perfect compliance simultaneously would not be realistic and could have unintended consequences e.g. removing suppliers from communities that rely on them, before remediation can occur. Our approach is therefore;

- identifying and prioritising the highest-risk supplier relationships and categories;
- engaging collaboratively to understand and address risks;
- supporting suppliers to improve, providing training and guidance where needed, and
- escalating and, where necessary, terminating relationships where serious, repetitive or unmitigated non-compliance is confirmed and cannot be remediated.

We do not regard low or medium supplier risk scores as licence to disengage. All suppliers are expected to meet our minimum standards, and our onboarding, monitoring and audit processes apply across the supply base.

Supplier Onboarding

Any supplier wishing to work with WSH must complete a detailed onboarding process that requires them to agree to our general terms and conditions of trade, which include anti-slavery and human trafficking clauses. They must confirm compliance with the following:

- WSH Modern Slavery Policy
- WSH Supplier Code of Conduct
- WSH Whistleblowing Policy
- UK Modern Slavery Act 2015 (where applicable) and provision of their own statement
- Due diligence processes within their own operations and supply chains
- Human trafficking provisions in any subcontractor or supplier contracts

In 2025, WSH launched a new digital risk module within the onboarding process for non-food and services suppliers. This takes suppliers through a dynamic SAQ (Supplier assessment questionnaire) process specific to their category; covering health and safety, subcontracting, modern slavery, cyber security and data protection. This significantly strengthens our due diligence across higher-risk non-food categories.

6. RISK ASSESSMENT AND DUE DILIGENCE

WSH uses a risk-based approach to identify, prioritise and manage modern slavery risk across our supply chain. Our ethical risk assessment, first conducted in 2024 by Unseen UK, covered 1,304 suppliers representing more than two-thirds of total direct spend.

Ethical Risk Assessment Framework

Suppliers are scored based on inherent and business-specific risk factors including;

- Category (purchasing group); some product and service categories carry inherently higher risk
- Supplier characteristics including operating location, size and sector
- Modern Slavery Statement compliance where required by law
- SEDEX membership status and SAQ completion
- Spend, materiality and contract value

Each criterion is assigned a risk score from 1 (highest risk) to 5 (lowest). The initial assessment identified 46 suppliers (3.5% of those assessed) with a total score of 5 or below, indicating the highest risk. Temporary staffing agencies were identified as the single largest purchasing risk group.

The risk assessment will be repeated every three years; the next assessment is planned for 2026/2027.

Case Study: Temporary Staff Agencies

Temporary staffing was identified as a high-risk category in 2024. WSH hires an average of 2,000 temporary workers each month across UK businesses, making this a priority area for 2025 action.

Actions taken in 2025:

- Implemented more thorough right-to-work checks across all temporary worker placements
- Streamlined agency partnerships, reducing the number of agencies on our Preferred supplier list by one third
- Required all active agencies to complete WSH's ESG questionnaire and pass risk assessment criteria
- Benchmarked hourly rates to ensure fair pay and reduce the risk of exploitation through underpayment

All active agencies on our Preferred Supplier List now meet our standards. This exercise has significantly reduced ethical risk in this category.

SEDEX and SAQ Engagement

SEDEX is the world's largest collaborative platform for sharing responsible sourcing data in supply chains. WSH requires all strategic and valued supplier partners to be registered on SEDEX with a completed SAQ.

Following the redesign of the SEDEX SAQ in 2024, many suppliers experienced difficulty completing the updated questionnaire. To support our supply base:

- WSH extended the completion deadline to 2026
- WSH engaged SEDEX directly to provide dedicated support to lapsed and new suppliers

By the end of the 2025 reporting period: 38% of strategic and valued suppliers were registered with a completed SAQ in place, and a further 12% were actively in the process of completing it.

Supplier Auditing

Following onboarding risk scoring, suppliers identified as high risk are prioritised for site audit. Site audits enable us to understand what suppliers are genuinely doing to protect their people and identify any remedial actions required. We monitor SAQ resubmissions closely to ensure no deterioration in supplier compliance status.

Ethical audits (including third-party audits) are planned to commence in 2026 as part of our ongoing improvement plan.

7. TRAINING AND AWARENESS

Building awareness and capability is essential to embedding an anti-slavery culture across our business. Our training approach targets both frontline employees and higher-risk functions, with continued development of materials and reach.

TRAINING TYPE	CONTENT	AUDIENCE	FREQUENCY	2025 OUTCOME
E-learning: Modern Slavery & Human Rights Awareness	Modern slavery definitions, warning signs, reporting	All employees (UK & Ireland)	Annually	1,231 employees completed the module

	mechanisms, legal obligations			
Higher-Risk Function Training	Focused training for functions with heightened exposure: procurement, HR, operations and general management	Procurement, Supply Chain	Annually	20 employees from high-risk functions trained
Responsible Recruitment (HR)	Effective recruitment practices including right-to-work checks, inclusive hiring, prohibition of recruitment fees; safeguarding module for education sector (aligned to DfE requirements)	General Managers and above; HR functions	Annually	Delivered to general managers and HR teams across operating businesses
WSH Board Training	Modern slavery obligations, governance responsibilities and emerging risk areas	WSH Board of Directors	Bi-annually	Delivered Q1 2024, scheduled 2026.

Our training programme is designed to ensure that colleagues most likely to encounter modern slavery risks are equipped to identify warning signs and know how to respond and report. Participation in ISEP environmental sustainability training, a related programme building broader ESG capability, was attended by equal numbers of female and male employees in 2025, demonstrating the reach of our learning infrastructure.

8. PROGRESS IN 2025

The following table summarises the commitments made in our 2024 statement and the progress achieved during the financial year ending 31 December 2025.

COMMITMENT	STATUS	WHAT WE DID
Achieve 100% SEDEX registration with completed SAQs for strategic and valued suppliers	In progress	Extended deadline to 2026 following SEDEX SAQ redesign. 38% of strategic and valued suppliers registered with completed SAQ; 12% actively completing. SEDEX providing dedicated support.
Roll out e-learning to all colleagues	In progress	1,231 employees completed modern slavery e-learning. Training focus shifting to location-based delivery to maximise risk mitigation where it matters most.
Ensure 100% of strategic and valued suppliers sign the Supplier Code of Conduct	Completed (strategic); in progress (valued)	100% of strategic suppliers remain signed. 94% of strategic and valued partners overall, covering 94% of value. SCoC 2.0 launching H1 2026.
Develop digital supply chain risk management capability	Completed	Launched new online risk management platform for non-food and services suppliers. Covers packaging, uniforms, equipment, cleaning, technology, temp agencies and marketing. Dynamic SAQ process live.

Reduce ethical risk in temporary staffing	Completed	Reduced agency supplier count by one third. All active agencies completed ESG questionnaire, passed risk assessment and meet hourly rate benchmarks. Right-to-work checks strengthened.
Implement remediation procedure and root cause analysis framework	In progress	Frameworks under development with Unseen UK. Any alleged incidents in the interim are managed collaboratively with Unseen. Ethical audits planned to commence 2026.
Increase supplier modern slavery policy coverage	In progress	48% of suppliers have a modern slavery policy in place. Monitoring continues via annual SAQ resubmission process.

KPI Summary 2025

METRIC	2025 OUTCOME
Employees trained on modern slavery (e-learning)	1,231
High-risk function employees trained	20
Strategic suppliers with signed Supplier Code of Conduct	100%
Strategic and valued suppliers with signed SCoC (by value)	94%
Suppliers registered on SEDEX with completed SAQ	38% (12% in progress)
Suppliers with a modern slavery policy in place	48%
Temporary staff agencies reduced on Preferred Supplier List	Reduced by one third
Internal policies updated	3 policies updated during 2025
Independent MSAT assessment score (City of London, WSH 2025 Statement)	108 — 'higher-performing organisation with a strong overall statement'

9. PARTNERSHIP WITH UNSEEN UK

Unseen is a UK charity providing safe houses and community support for survivors of trafficking and modern slavery. They operate the UK Modern Slavery & Exploitation Helpline and work with businesses, governments, charities and statutory agencies to eradicate modern slavery. WSH has been an Unseen Business Hub member since 2023.

Our partnership with Unseen provides access to specialist expertise and bespoke services, including gap analysis, risk assessment and guidance on remediation. The Unseen whistleblowing helpline is referenced in our Whistleblowing Policy and shared with employees as an independent, confidential reporting route.

Progress against Unseen-recommended objectives during 2025:

AREA	OBJECTIVE	2025 PROGRESS
Prevent	Modern Slavery training; Whistleblowing policy; updated Recruitment policies	Training delivered to 1,231+ employees and 20 high-risk function staff. Whistleblowing

		policy active. Recruitment policies under annual review.
Identify	Supply chain risk assessment; ethical audits	Risk assessment covering 1,304 suppliers completed (2024). New digital risk platform for non-food/services launched 2025. Ethical audits planned for 2026.
Mitigate	Remediation procedure; root cause analysis framework	Frameworks under development. Unseen UK support interim incident response. All alleged incidents handled collaboratively with Unseen.

10. LOOKING AHEAD: 2026 COMMITMENTS

Building on progress made in 2025, WSH is committed to the following actions in the next reporting year:

- Launch Supplier Code of Conduct edition 2.0 (H1 2026), with strengthened expectations around human rights due diligence
- Achieve 100% SEDEX registration with completed SAQs for all strategic and valued supplier partners
- Commence ethical audits, including third-party audits, for high-risk suppliers identified through the ethical risk assessment
- Repeat the supplier ethical risk assessment (next scheduled 2026/2027)
- Develop remediation procedure and root cause analysis framework in partnership with Unseen UK
- Launch 'The Standard' — WSH's new centralised core policy framework — including updated Modern Slavery policy across all operating brands (phased roll-out from September 2026)
- Conduct TISC (Transparency in Supply Chains) guidance improvements in training quality and coverage, including lived experience engagement in training design
- Continue to improve data quality across KPIs, aiming for more granular spend-based risk scoring
- Extend modern slavery training to European operating territories as the Group's footprint grows
- Work with sector experts including Unseen UK, SEDEX and the UNGC to further strengthen our approach
- Launch Supplier Modern Slavery toolkit in collaboration with Unseen.

11. INCIDENT REPORTING

WSH had no confirmed modern slavery incidents within its own operations or Supply Chain during the financial year ending 31 December 2025.

We remain committed to operating responsibly and with integrity. Whilst we assess the risk of modern slavery within our own directly employed workforce as low; given the strength of our recruitment processes, living wage commitments and workplace culture, we acknowledge that risk in our wider supply chain, particularly indirect and seasonal categories, is higher. We continue to address this through the measures outlined in this statement.

The scale of modern slavery globally, with an estimated 50 million people in situations of forced labour or forced marriage according to the ILO, underscores the continued urgency for collective action. WSH remains committed to being part of the solution through transparent reporting, meaningful collaboration and continuous improvement.

For further information, see WSH International Investments Limited 2025 Annual Accounts and the WSH Second Nature 2025 Sustainability Report.
Website: www.wshlimited.com

APPROVAL AND SIGNATURES

This statement was approved by the Board of Directors of WSH International Investments Limited.

<p>ANDY MILNER WSH Procurement and Supply Chain Director</p> <p>Signature: </p> <p>Date: 30th June 2026</p>	<p>DENISE ALLEN WSH UK & Ireland HR Director</p> <p>Signature: </p> <p>Date: 30th June 2026</p>
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