

Modern Slavery Statement for Financial Year 01.10.24

This statement is made pursuant to the Modern Slavery Act 2015. It sets out the steps that Willerby is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Willerby recognises that Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. Willerby has a zero-tolerance approach to any form of modern slavery. Willerby is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective and proportionate systems and controls in place to safeguard against modern slavery taking place within the business or our supply chain.

Our Business

Willerby is the UK's leading manufacturer of static holiday homes and luxury lodges. We also manufacture residential park homes. We operate in the UK at two sites in Hull, selling and distributing the homes mainly in the UK through our own Show Grounds, a number of dealers and directly to holiday parks and residential parks. Most components are bought directly from UK suppliers with whom we have a long relationship although some are sourced from overseas, mainly from Europe. New suppliers are engaged when circumstances merit and subject to appropriate due diligence.

All assessments to date with respect to our responsibilities under the Modern Slavery Act 2015 have reported that Willerby has not reported any high-risk areas. This matter has been kept under regular review by our directors as well as procurement and purchasing personnel since that time, and we believe we remain at relatively low risk.

Our policies

We have a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These internal policies are available on the company's intranet or from the Human Resources team. These include:

1. All Willerby Board members and senior managers are aware of the provisions and requirements to comply with the Modern Slavery Act 2015.
2. Willerby has a written Anti-Slavery and Human Trafficking Policy which sets out the organisation's stance on modern slavery and explains how employees who identify any instances of this can report via the whistleblowing provisions. It also explains the manner in which we behave as an organisation and how we expect our employees to behave.
3. Our whistleblowing policy exists so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Contact details for the Director of People, the Chief Financial Officer and Protect (an independent whistleblowing charity) are detailed in this policy.
4. Willerby operates a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Internal Payroll checks are also carried out to

identify any potentially at-risk employees, including confidential verification of bank accounts.

5. Posters are positioned throughout our sites reminding staff of our responsibilities under the Modern Slavery Act 2015.
6. We operate an anti-harassment and bullying policy which provides guidance on how to raise concerns regarding harassment or bullying.
7. Our suppliers should take this statement as notice of Willerby's policy against any Modern Slavery practices within their own organisation or own supply chain.
8. Willerby has a "Works Council" being an active forum where our employees can raise any concerns through their representatives about our business.

Our suppliers

In common with many manufacturers Willerby has a number of long-established suppliers and a number of preferred suppliers. Willerby continues to conduct proportionate due diligence on suppliers before allowing them to supply and/or become a preferred supplier. This due diligence includes:

1. We send questionnaires as part of the vendor onboarding process and conduct online searches to ensure that that particular organisation has never been convicted of offences relating to modern slavery.
2. Managers visiting suppliers' premises are instructed to informally monitor working conditions. Procurement teams are instructed to report purchases offered at unrealistically low prices and the use of labour engaged on unrealistically low wages.
3. After initial onboarding, we regularly send out questionnaires to suppliers of direct materials enquiring as to what steps they have taken to eradicate slavery within their own business and how they hold their own suppliers to account over modern slavery. Additional enquiries are made to check that they pay at least the national minimum wage in the UK. For any international supplier we ask that they pay their employees any prevailing minimum wage applicable within their country of operations. Enquiries are made of suppliers of indirect goods and services according to their location, type of goods supplied, and spend.
4. We reserve the right to terminate any contract at any time should any instances of Modern Slavery come to light.

Reliance on Subcontractors and Employment Agencies

Willerby works with a preferred supplier list for the supply of subcontract labour. Service Level Agreements are in place with each supplier which enables the business to monitor and audit each organisation on their compliance to the Modern Slavery Act 2015. This includes review of Modern Slavery Policy, IR35 compliance and right to work in the UK audits.

Training

Willerby continues to provide Directors and staff with training and refresher training with regards to the Modern Slavery Act 2015.

Our Key Performance Indicators

Whilst Willerby cannot guarantee our entire supply chain is entirely free of all aspects of Modern Slavery, we nevertheless have a zero tolerance of the same if it is ever discovered. Although we believe our risk rating is relatively low, incidences identified through our internal procedures already covered above or through Whistleblowing are monitored by the Director of People and reported each month as part of the functional reporting to the Board.

Approval of this Statement

This statement was approved by the Board of Directors on 7th M a y 2 025.

Lindsay Edet

Lindsay Edet
Director