WGC

Since 1974

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT
WGC Ltd

This statement is made under section 54(1) of the Modern Slavery Act 2015. It sets out the steps WGC Ltd ("WGC") has taken during the financial year ending 31 March 2026 to ensure that slavery and human trafficking are not taking place in any part of our business or supply chains.

WGC has a zero-tolerance approach to modern slavery and human trafficking. We recognise that the cleaning and hospitality sectors carry particular risks, and we keep our controls under ongoing review.

1. Our Business

WGC has provided housekeeping and cleaning services to the hospitality industry for over 50 years. We employ around 6,000 people, working across client properties throughout the UK. Our services include:

- Hotel housekeeping
- Window and specialist cleaning

Everyone who delivers our services is directly employed by WGC. We do not use agency workers, labour providers or subcontractors to deliver our services. This removes the highest-risk area of labour supply in our sector.

Each site is managed by site management, reporting through Area Managers and Operations Directors to the Chief Executive. The People Director has day-to-day responsibility for this statement and our Modern Slavery Policy. The Board has overall responsibility.

2. Our Supply Chain

Our procurement is limited to cleaning chemicals, equipment, uniforms and sundries. We do not procure labour. We consider the modern slavery risk in our supply chain to be low. New suppliers are currently asked to provide a self-declaration of compliance with the Modern Slavery Act 2015 before they are appointed. We acknowledge that this is a self-declaration only and does not constitute a full audit of supplier practices. Introducing a structured supplier modern slavery questionnaire is a priority for the coming year.

3. Our Clients

Our services are delivered on our clients' premises. We welcome client audits of our practices, including those relating to modern slavery, and three client audits took place during the year.

If we received an allegation of modern slavery or human trafficking concerning a client, we would act immediately, including by notifying the appropriate authorities and taking all steps necessary to protect any individual affected.

4. Where the Risks Lie

The main risk in our business is not WGC's own practices but the exploitation of individuals by third parties, before or during their employment with us. Our workforce includes many entry-level roles and many colleagues whose first language is not English. Indicators we are alert to include:

- a third party controlling a worker's wages, bank account or identity documents
- workers being charged fees to obtain work
- several workers sharing the same bank account or address
- workers being transported to and from work by the same third party, or appearing fearful or withdrawn

5. Our Controls and Due Diligence

- Right-to-work checks are completed for every employee before they start, using the check prescribed by the Home Office for that individual: an online share-code check, a manual check

of original documents, or a certified digital identity check, with the Employer Checking Service used where required.
- Employees joining us under TUPE have their right to work rechecked within 60 days of transfer.
- We recruit directly and never charge candidates fees to obtain work.
- Wages are paid directly into a bank account in the employee's own name. Payroll flags any bank account or address shared by more than one employee for review.
- Every employee receives a written contract setting out their hours, pay and notice, and can access their payslips electronically.
- We never ask employees to surrender passports, identity documents or work permits.
- Internal site audits are carried out every four weeks across our locations.

6. Remediation

If a case of modern slavery or human trafficking were identified within our business or supply chain, WGC would take immediate action. Our response would be victim-centred: we would prioritise the safety and wellbeing of the individual concerned, connect them with appropriate support services, notify the police and support a referral into the National Referral Mechanism through a first responder.

We would suspend or terminate our relationship with any supplier or third party found to be involved, and we would conduct a full review of the controls that failed to prevent the situation. We are committed to being transparent about any cases identified and the steps taken in response.

7. Our Policies

Our approach is supported by the following policies, which are reviewed annually and available to all employees on Connect:

- Modern Slavery and Human Trafficking Policy
- Right to Work and Immigration Compliance Policy
- Recruitment and Selection Policy
- Whistleblowing Policy
- Standards and Conduct Policy
- Anti-Bribery and Corruption Policy
- Disciplinary Rules and Procedure
- Grievance Rules and Procedure
- Equal Opportunity, Anti-Harassment, Bullying and Dignity at Work Policy
- Equality, Diversity and Inclusion Policy
- Property and Equipment Policy
- Health and Safety Policy

8. Training and Awareness

- Modern slavery awareness forms part of our new starter induction.
- Modern slavery e-learning is mandatory for all employees and managers, and completion is tracked.
- Senior managers receive quarterly briefings on modern slavery and human trafficking.
- Awareness posters are displayed at our sites in multiple languages.
- Guidance and policy updates are published on Connect.

9. Reporting Concerns

Employees can raise concerns confidentially through the People Helpline (People@wgc.ltd.uk), which responds within 12 hours, or under our Whistleblowing Policy. We will not tolerate any detriment to anyone who raises a genuine concern.

Concerns can also be reported to the independent Modern Slavery and Exploitation Helpline on 08000 121 700.

No concerns relating to modern slavery or human trafficking were reported during the year.

WGC

Since 1974

10. Measuring Effectiveness

We use the following measures to assess whether our controls are working:

Measure	Financial year ending 31 March 2026
New starters with right to work verified before their first day	100%
TUPE transferees with right to work rechecked within 60 days	100%
Managers completing modern slavery e-learning (where completion is tracked)	100%
Internal site audits completed	300
Client audits of WGC practices	3
Modern slavery concerns reported, and outcome	0 – no cases

11. Priorities for the Coming Year

- Introduce a structured supplier modern slavery questionnaire to replace the current self-declaration process
- Extend training completion tracking to all sites
- Review our workwear provision and recovery arrangements

Approval and Publication

This statement was approved by the Board of Directors of WGC Ltd on 6 April 2026 and is signed on its behalf by a director. It is published on WGC's website, with a prominent link from the homepage, in accordance with section 54 of the Modern Slavery Act 2015. It will be reviewed and updated annually. A copy of our Modern Slavery and Human Trafficking Policy is available on request.

Martin Birch – Chief Executive Officer

For and on behalf of the Board of Directors, WGC Ltd

Date: 6 April 2026

Version 1.0 | Approved 6 April 2026 | Next review: April 2027