

Winners First Trading Limited

Modern Slavery Statement for financial year ending August 2024

Introduction

The provision in the Act requires that any commercial organisation in any sector, which supplies goods or services, and carries on a business or part of a business in the UK, and is above a specified total turnover, must produce a slavery and human trafficking statement for each financial year of the organisation.

For the purposes of this requirement, 'supply chain' has its everyday meaning. Regulations have set the total turnover threshold at £36m.

Winners First Trading Limited confirm that we are not a commercial organisation as defined by Section 54 of the Modern Slavery Act 2015 ("the Act")

Although Winners First Trading Limited are not a commercial organisation as defined by Section 54 of the Modern Slavery Act 2015 ("the Act"), Winners First Trading Limited has established a set of principles that guide our every decision and action.

In accordance with such principles, all employees as well as the management of Winners First Trading Limited are absolutely committed to legal compliance and ethical practices, we take the matter of "Modern Slavery" very seriously within our business and therefore have produced the following Statement

Policy – Modern Slavery

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that Winners First Trading Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Winners First Trading Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-Slavery Policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Recruitment Policy. We operate 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.
- Whistleblowing Policy. We operate a whistleblowing policy 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.
- Code of Conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our Suppliers

Winners First Trading Limited operates a supplier policy and maintains a preferred supplier list.

We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to



modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations

We may terminate the contract at any time should any instances of modern slavery come to light

Training

It is important that Winners First Trading Limited's staff are aware of and understand the risks of slavery and human trafficking. Staff must be able to identify signs of slavery and human trafficking and be aware of what action to take if such activities are suspected. Winners First Trading Limited will, therefore, consider training opportunities at appropriate levels within the UK.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Further steps and monitoring

Winners First Trading Limited is aware of the pernicious nature of modern slavery and therefore understands that the steps Winners First Trading Limited takes regarding risk associated with modern slavery should not be static.

Winners First Trading Limited will continue to monitor operational practices, review its approach and continue to build on this in the year ahead.

Approval for this Statement

Signed for and on behalf of the "Board" of Winners First Trading Limited

Name: Abdulkareem Sawwan

Signature:

Company: Winners First Trading Limited

Position: Director

Date: 31st August 2024

Version: 2.0