Winners First Trading Limited
Modern Slavery Statement for financial year ending August 2026

Introduction

The Modern Slavery Act 2015 requires that any commercial organisation—regardless of sector—that supplies goods or services, conducts business in whole or in part within the UK, and exceeds the specified total turnover threshold, must produce an annual statement addressing slavery and human trafficking within its operations. For the purpose of this requirement, the term 'supply chain' is to be interpreted in its usual, everyday sense. Under current regulations, the turnover threshold is set at £36 million.

Winners First Trading Limited affirms that it does not meet the definition of a commercial organisation as specified in Section 54 of the Modern Slavery Act 2015 ("the Act"). Nevertheless, as an organisation guided by robust ethical principles, we remain dedicated to upholding the highest standards of legal compliance and responsible business conduct.

Although not legally required to make a slavery and human trafficking statement, Winners First Trading Limited is deeply committed to addressing the issue of modern slavery within our sphere of influence. Both our management and employees are resolute in their commitment to ethical practices, and, as a reflection of these values, we have prepared this Statement to outline our approach.

Policy – Modern Slavery

This statement is issued in accordance with Section 54(1) of the Modern Slavery Act 2015 and outlines the measures undertaken and continually implemented by Winners First Trading Limited to prevent modern slavery and human trafficking within our operations and supply chain.

Modern slavery, for the purposes of this policy, comprises slavery, servitude, human trafficking, and forced labour. Winners First Trading Limited maintains a strict zero-tolerance stance toward all forms of modern slavery. We are unwavering in our commitment to ethical conduct, integrity, and transparency across all aspects of our business. To this end, robust systems and controls have been established and are regularly reviewed to ensure that neither modern slavery nor human trafficking occurs within our organisation or supply chain.

Our approach reflects our dedication to upholding the highest standards of responsible business practice and safeguarding human rights throughout our commercial activities and relationships.

Our Policies

To uphold our commitment to ethical and transparent business practices, we have implemented a comprehensive suite of internal policies designed to mitigate the risk of modern slavery within our organisation and operations. These policies include:

- Anti-Slavery Policy: This policy articulates the organisation's position on modern slavery, providing clear guidance for employees on how to recognise potential instances, along with procedures for seeking support and reporting concerns.
- Recruitment Policy: Our robust recruitment procedures incorporate rigorous eligibility to work checks for all prospective employees, ensuring compliance with relevant laws and safeguarding against risks of human trafficking or forced labour.

- Whistleblowing Policy: We maintain an accessible whistleblowing framework, empowering employees to raise concerns confidentially about any aspect of workplace conduct or supply chain practices, without fear of retaliation.
- Code of Conduct: This code sets out the standards of behaviour expected from all employees and associated parties, reinforcing our organisational values and expectations for ethical conduct throughout our business relationships.

Our Suppliers

Winners First Trading Limited maintains a robust supplier policy, supported by a preferred supplier list. Prior to engagement, comprehensive due diligence is undertaken for all prospective suppliers. This process includes an online review to confirm that no organisation has been convicted of offences relating to modern slavery. Our Anti-Slavery Policy forms an integral part of the contractual agreement with every supplier, who must explicitly attest that none of their business operations contravene our policy.

As a mandatory contractual requirement, suppliers are obliged to provide written confirmation of the following:

- Active measures have been implemented to eliminate modern slavery within their organisation.
- They require their own suppliers to uphold equivalent standards in relation to modern slavery.
- UK-based suppliers pay employees at or above the applicable national minimum wage or national living wage.
- International suppliers pay their employees at least the prevailing minimum wage within the relevant jurisdiction.

Should evidence of modern slavery arise in any part of a supplier's operations, Winners First Trading Limited reserves the right to terminate the contractual relationship without notice.

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.

Performance Indicators

To assess the effectiveness of our efforts to prevent slavery and human trafficking within our business and supply chain, Winners First Trading Limited relies on a range of performance indicators. A key indicator of success is the absence of any reports, whether from staff, the public, or law enforcement agencies, highlighting instances or suspicions of modern slavery within our operations or those of our suppliers

Continuous Improvement and Monitoring

Winners First Trading Limited recognises that the risks associated with modern slavery are complex and evolving. As such, our approach is dynamic, involving ongoing evaluation and refinement of our practices. We are committed to regularly monitoring our operations and supply chain, reviewing our procedures, and implementing enhancements as needed to ensure a robust and proactive stance against modern slavery in the year ahead and beyond.

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 2026

Version: 4.0