



## Modern Slavery and Human Trafficking Statement

For the Financial Year Ending 31 December 2024  
Wernick Group (Holdings) Limited

1. **Introduction.** This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that Wernick Group (Holdings) Limited and its subsidiaries (“the Wernick Group”) has taken during the financial year ending 31 December 2024 and our continuous plans to prevent modern slavery in our business operations and supply chains.

Modern slavery is a serious crime and a violation of human rights, involving exploitation through slavery, servitude, forced labour, or human trafficking. Wernick Group is committed to conducting business responsibly, ethically, with integrity and in compliance with all applicable laws and regulations. We oppose all forms of modern slavery and are committed to taking appropriate steps to ensure that these practices do not occur in any part of our business or our supply chains.

### 2. **Our Organisational Structure, Business and Supply Chains**

a. **Organisation Structure and Business.** Wernick Group is one of the UK’s leading providers of portable and modular buildings supplying products to a variety of sectors including: Construction, Healthcare, Education, Events, MOD, Industrial, Leisure and Custodial.

Wernick Group (Holdings) Limited (company number: 03671447) is the parent company of several subsidiaries, including, but not limited to, S Wernick & Sons (Holdings) Ltd, Wernick Buildings Ltd, Wernick Construction Ltd, Wernick Hire Ltd, Wernick Event Hire Ltd, Wernick Refurbished Buildings Ltd, Wernick Power Solutions Ltd, Wernick AV Danzer Ltd and Rawley Plant Hire Ltd.

Wernick Group head office is at Molineux House, Russell Gardens, Wickford, Essex, England, SS11 8QG. Wernick Group employs approximately 950 staff operating in 9 companies over 39 sites in the United Kingdom, supplying mainly UK based client requirements.

Further details about Wernick Group can be found at <https://www.wernick.co.uk>

b. **Our Employees.** Wernick Group complies with all relevant employment regulations and legislation, and we continue to monitor our employment practices to ensure they are aligned and comply to regulations and legislation.

c. **Our Supply Chains.** We have a substantial number of suppliers and subcontractors supporting our business operations, of which the majority are UK based. Our suppliers and subcontractors mainly provide the following range of goods and services:

(1) Materials for modular buildings, including refurbished buildings, steel components, panels, insulation, windows, doors, glazing, mechanical and electrical components, plumbing supplies, flooring, generators, furniture, office supplies, etc.

(2) Consultancy and Sub-contract services for construction, transportation, installation, dismantling, repair/maintenance, information technology, catering, cleaning, photography, security services, etc.

We recognise that certain regions and sectors present higher risks of modern slavery, and we are committed to identifying and managing those risks.

3. **Organisational Policy.** Wernick Group has a zero-tolerance approach to modern slavery. We have implemented doctrine which includes certified Management Systems, Intranet communications, Safety Schemes in Procurement (“SSIP”) and professional memberships, that where applicable, enable and communicate all of our corporate social responsibility policies. We have developed specific policies and procedures that directly address and/or have a tangible link to modern slavery and our ethical, legal and contractual obligations.

- a. Management systems held across the group entity:
  - (1) ISO Management systems including ISO9001, ISO45001, ISO14001 and BIM19650 certifications;
  - (2) Forestry Stewardship Commission (FSC) certification;
  - (3) Product and service compliance certifications.
  
- b. Intranet communication system:
  - (1) Wini;
  - (2) Message the CEO.
  
- c. SSIP memberships and professional associations:
  - (1) Achilles Building Confidence;
  - (2) Achilles Utilities Vendor Database (“UVDB”) Service;
  - (3) Constructionline;
  - (4) Safecontractor;
  - (5) Fleet Operator Recognition Scheme (“FORS”).
  
- d. Policy level documents and statements:
  - (1) Wernick Group Modern Slavery and Human Trafficking Statement ;
  - (2) Anti-Modern Slavery and Human Trafficking Policy;
  - (3) Human Rights Policy Statement;
  - (4) Recruitment and Selection Policy;
  - (5) Equal Opportunities Policy;
  - (6) Sustainability Policy Statement;
  - (7) Anti Bribery & Corruption Policy;
  - (8) Corporate Social Responsibility Policy;
  - (9) Whistleblowing Policy;
  - (10) Counterfeit, Fraudulent and Suspect Items Statement;
  - (11) Health and Safety Policy Statement.

Our policies and statements are developed in collaboration and consultation with relevant teams, such as purchasing, production, operations, human resources, legal, health, safety, environmental and quality functions within the Wernick Group. We plan to further develop our policies and procedures across the Wernick Group.

Policy and guidance are communicated to employees on the Intranet (Wini) and Jonathan Wernick is responsible for ensuring compliance with modern slavery and human trafficking policies.

4. **Assessing and Managing Risk.** In our internal operating companies, we consider the risk of modern slavery to be low. However, we recognise that certain areas of our supply chain may be more vulnerable to modern slavery. We assess and manage risks by:

- a. The establishment of a core team of employees suitably trained in Modern Slavery;
- b. Identification of the internal stakeholders who are most likely to identify Modern Slavery;
- c. Identifying which suppliers and subcontractors are at significant risk of being complicit to Modern Slavery;
- d. Implementing appropriate checks and measures to ensure compliance.

5. **Due Diligence.** We have implemented a range of due diligence processes to identify and mitigate modern slavery risks, such as:

- a. **Pre-qualification of suppliers** - Prospective new suppliers go through various pre-qualification checks to become an Approved Supplier.
- b. **Supplier Audits** - All suppliers are audited on an annual basis requesting up-to-date insurance details and certificates, along with a renewal of their commitment to adhere by Wernick Group's policies and procedures.
- c. **Human Resources Procedures** - Wernick Group complies with all relevant employment regulations and legislation. Wernick Group's obligation is to ensure fairness in the selection, hiring and advancement of all employees, both permanent and temporary, without discrimination. All staff have a personal responsibility for maintaining a respectful work atmosphere, free of abusive or unprofessional conduct. Each employee is expected to respect other people and treat them with dignity.
- d. **Communication** - Company policies are communicated to all new staff as part of their induction process. Existing employees access these policies via Wernick Group's intranet and receive periodic notifications of renewals, updates or amendments.
- e. **Internal Audits** - All Wernick Group operating companies and their locations go through various audits periodically to ensure their continued full compliance with all Wernick Group policies, standards and procedures. Wernick Group will assess any instances of non-compliance and take appropriate remedial action as necessary.

In the financial year ending 31 December 2024, we did not encounter any modern slavery incidents.

6. **Training.** A core team of employees has been suitably trained in Modern Slavery.

7. **Monitoring and Evaluation.** We measure the effectiveness of our actions by:

- a. Monitoring whistleblowing reports, grievance reports and direct messages to the CEO;
- b. Internal reviews and audits;
- c. Supplier performance evaluations;
- d. Reviews of supplier onboarding questionnaires.

8. **Future Steps - Plans for 2025 and Beyond.** Over the next period, we plan to:

- a. Produce a Supplier's Code of Conduct;
- b. Improve the Subcontractor and Supplier onboarding process;
- c. Continue to review and improve organisational policies;
- d. Establish additional training to staff, to include Toolbox Talks;
- e. Raise awareness internally on our intranet.

9. **Review Process.** This statement will be reviewed and updated annually. This statement will be published on our website <https://www.wernick.co.uk> as required under section 54 (7) of the Modern Slavery Act 2015.

10. **Board Approval.** This statement has been approved by the Board of Directors of Wernick Group (Holdings) Limited and signed by:

Signed:

Date: 23<sup>rd</sup> June 2025

Jonathan Wernick  
Chief Executive Officer  
Wernick Group (Holdings) Limited