



Modern Slavery & Human Trafficking Policy

Wogen recognises that in order to be a successful and valued partner to its customers, business must be conducted in a sustainable manner. This means that, in addition to operating a business that delivers good commercial value in fulfilling customer objectives, we must be sure that our services are delivered in a way that does not threaten the ability of others to enjoy basic human rights.

Sourcing and trading materials from across the world, Wogen is acutely aware of the need to ensure that the materials we supply reflects the values we aspire to. Throughout our activities and supply chain there is no place for slavery, forced labour or human trafficking. In the current year we have corresponded with our counterparties affirming that adherence to our Modern Slavery and Human Trafficking Policy forms part of our standard Terms and Conditions of trade. We apply an “eyes-on” principle in visiting and assessing for ourselves the adherence of our counterparties to the standards of operation we would expect within their local communities.

Wogen’s teams have chosen freely to work for us and do so in an equitable environment without any form of arbitrary discrimination, enjoying the right to have their voice heard as an individual or collectively if they feel the need. All work will be age-appropriate (where those under 18 come into our business it will be as part of their education and development) and everyone will be supported to maximise their contribution to the company. This vision of a workplace leaves no place for slavery, forced labour or human trafficking.

We are committed to ensuring that our supply chain upholds these values and that material tainted by unacceptable labour standards should not be traded. Although the nature of international trade makes absolute confidence very difficult to acquire, we have worked to create a culture where:

- Everyone working for us understands the risks of slavery, trafficking and exploitative workplaces and are committed to eliminating them. This is part of our code of conduct and training given to new starters.
- Counterparties are known to the business, visited where possible and evaluated before trading occurs. Internal audits confirm consistent and effective application of policies.
- Through active participation in industry forums such as the MMTA, we are aware of rogue operators and risk factors within individual businesses, regions or commodities.
- We share the good and not so good that we learn about potential counterparties openly throughout the group and make it available to our traders and decision makers.
- The origin of material is identified and documented wherever possible and its status is clearly communicated to customers in line with their requirements and the risks we have identified.
- Anyone in our supply chain, customer base or teams can report concerns for investigation to our company secretary or via our whistleblowing procedure. Though the facility has been available throughout, no reports of this kind have been received in the past financial year.

This policy has the full support of our Board of Directors and hence the commitment of the entire company.

John Craig, CEO

This policy is re-issued annually and includes the statements required by Section 54 of the Modern Slavery Act for the year ending September 2019.