

Modern Slavery and Human Trafficking Statement

Effective January 2026

Introduction

This statement sets out Woodall-Nicholson Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year December 2024 – November 2025.

As part of the automotive manufacturing industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Woodall-Nicholson Ltd.

The organisational structure of the business is a privately-owned enterprise that manufactures vehicles by modifying them to the customer's specifications. Operating under separate divisions including Coleman Milne, VCS Police and Special Projects, Treka Bus, JM Engineering, Promech Engineering and Mellor Bus, we are a part of Woodall-Nicholson Ltd whose head office is in Westhoughton, Bolton, UK. The Group employ approximately 350 people and operate in the United Kingdom.

The Group's key supply chains involve the purchase of vehicles and vehicle parts from countries across the globe.

Countries of operation and supply:

We currently operate in the following countries:

- United Kingdom; Germany; Netherlands; France; Belgium; Italy; Poland; Finland; Spain; Turkey; Australia; Slovenia; China; Mexico and USA

The following is the process by which the company assesses whether activities or countries are high risk in relation to slavery or human trafficking:

- Supplier Risk Segmentation – Mandatory Supplier Commitment, Due Diligence by Risk Segmentation - Issuing Self-Assessment Questionnaire – Evidence sampling, Site Audits and corrective actions including Tier 2 suppliers.
 - risk → due diligence → evidence → audit → corrective action → monitoring → escalation

High-risk activities

We acknowledge that the following regions and activities are considered to be at high risk of slavery or human trafficking:

- SE & E Asia; Eastern Europe & Balkans and Latin America.
- Seat/Trim/Fabrication; GRP/Plastics; Wiring Looms; Agency & Sub-contact labour.

The business has measures in place to mitigate risks arising from these regions and activities as set out below.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** Head of HR and Head of Supply Chain.
- **Risk assessments:** Risk assessments are carried out by the Supply Chain team when we are instructing new suppliers to ensure their compliance with Modern Slavery and Human Trafficking laws.
- **Investigations/due diligence:** The HR Team and the Supply Chain Team would be responsible for investigating any potential breaches of these laws.
- **Training:** Woodall-Nicholson Ltd aims to provide training and awareness for relevant teams regarding Modern Slavery and Human Trafficking on an annual basis and aims to raise awareness across all Managers in the current financial year.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** Our code makes it clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supply Chain Code of Conduct** sets out the minimum standards expected of all suppliers, subcontractors, labour providers and service partners. Compliance with this Code is mandatory and applies to all tiers of the supply chain.
 - Suppliers must comply with all applicable local, national and international laws, including the UK Modern Slavery Act 2015 and relevant ILO conventions. Where standards differ, the higher standard shall apply.
 - Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship. The Code of Conduct is referenced in Purchase Orders, Onboarding/Supplier Self-Assessment documents and contracts when issued.
- **Recruitment Policy** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All agencies must produce and evidence their compliance with Modern Slavery and Human Trafficking laws.

Due diligence

We undertake due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Our due diligence and reviews include:

- Supplier risk is assessed using a risk-based framework – Supplier Risk Segmentation – region and process, supported by evidence review and corrective action tracking. Tier 1 Suppliers.
- Supplier acknowledgment and acceptance of the “Code of Conduct”.
- Generation of Tier 2, 3. Supply Chain mapping.
- Issuing of Supplier Self Assessments.
- Onsite assessments/audit when deemed necessary, including risk scoring, decision making and Issuing Corrective and Remediation (CAPA/NCR).
- Ongoing Monitoring and Internal escalation and governance.
- Ensure documentation and evidence retention.
- Review overall effectiveness and incorporation into the Vendor Scorecard.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- Requiring all Managers, supply chain team and HR professionals to have completed training on modern slavery within the financial year 2025-2026 and thereafter on an annual basis.

- A system for supply chain verification is in place since September 2024 with Top 20 and New Vendors expected to be completed by November 2026; whereby we will evaluate all existing suppliers.

Training

We require certain key personnel within our organisation to complete training on modern slavery as a module within our wider online training system Xcenta.

We endeavour to train all Managers, specifically those who may be responsible for hiring staff, to sign up to relevant courses to assist in raising awareness of Modern Slavery and Human Trafficking within the current financial year.

We endeavour to raise awareness to the whole workforce in the current financial year by sharing information from 'Stronger Together' via our internal newsletter, emails and posters.

Our modern slavery training covers

- Understand what modern slavery is (not just the term)
- Recognise risk indicators relevant to their role
- Know how the Supplier Code of Conduct applies in practice
- Identify red flags in suppliers, labour providers, and subcontractors
- Take correct action and escalate appropriately
- Understand their personal responsibility
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within our organisation.
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Senior Leadership Team Approval

This statement was approved on 5th January 2026 by our Senior Leadership Team who review and update it annually.

CEO's Signature and Name

A handwritten signature in black ink, appearing to read "John Randerson". The signature is written in a cursive style with a large, looped 'J' and 'R'.

John Randerson

5th January 2026