

WHARTON GLOBAL MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Date: August 2026

1. Purpose and Scope

Wharton Global Limited is committed to conducting its business responsibly, ethically and in accordance with applicable laws and regulations.

We have zero tolerance for modern slavery and human trafficking. We recognise that modern slavery is a serious crime and a violation of fundamental human rights. It can take a number of forms, including slavery, servitude, forced or compulsory labour and human trafficking, all of which involve the exploitation of individuals for personal or commercial gain.

This policy applies to everyone working for or on behalf of Wharton Global, including employees, directors, contractors, consultants, temporary workers, interns, agents and other third parties acting on our behalf.

This policy does not form part of any employee's contract of employment and may be amended from time to time.

2. Other Relevant Policies

This policy should be read alongside Wharton Global's other relevant policies and procedures, including our Employee Handbook, Code of Conduct, Whistleblowing Policy, Recruitment and Selection procedures, Data Protection Policy and relevant supplier or contractor arrangements.

3. Our Approach

Wharton Global is a small professional services organisation and recognises that the risks of modern slavery and human trafficking within our direct operations are relatively low.

Nevertheless, we recognise that risks may arise through our recruitment processes, contractors, consultants, suppliers and other business relationships.

We are committed to:

- Treating all individuals working for or with us fairly and with dignity and respect.
- Complying with applicable employment and human rights legislation.

- Not knowingly engaging in or supporting forced, bonded or involuntary labour.
- Taking reasonable and proportionate steps to identify and address modern Slavery risks relevant to our business.
- Expecting our suppliers, contractors and business partners to comply with applicable laws and to operate ethically and responsibly.

We will take appropriate action where concerns relating to modern slavery or human trafficking are identified.

4. Suppliers and Business Partners

We recognise that modern slavery can occur within supply chains and third-party relationships, even where a business has no direct involvement in exploitation.

When appointing suppliers, contractors or other third parties, we will take a proportionate approach to assessing relevant risks, taking into account the nature of the service, the relationship and the potential exposure to modern slavery.

Where appropriate, we expect suppliers and contractors to:

- Comply with applicable employment and human rights laws.
- Not use forced, bonded or involuntary labour.
- Not knowingly participate in human trafficking or exploitation.
- Raise concerns where they identify potential modern slavery or human trafficking.

Where a significant concern is identified, Wharton Global will consider what action is appropriate. This may include seeking further information or assurances, requiring corrective action or, where appropriate, ending the business relationship.

We do not expect every supplier to undertake extensive modern slavery compliance programmes where these would not be proportionate to the nature and scale of their business or the services they provide to us.

5. Your Responsibility

Preventing, identifying and reporting modern slavery and human trafficking is the responsibility of everyone working for or on behalf of Wharton Global.

All employees and contractors should:

- Familiarise themselves with this policy.
- Remain alert to potential signs of exploitation.

- Raise concerns promptly where they suspect modern slavery or human trafficking.
- Cooperate appropriately with any investigation.

Potential warning signs may include a person appearing fearful or controlled, being unable to leave their employment freely, having their identity documents withheld, having wages withheld or controlled by another person, being subjected to threats or intimidation, or being forced to work through coercion or deception.

A single warning sign does not necessarily mean that modern slavery is taking place. However, concerns should not be ignored.

Individuals should not attempt to investigate or confront a suspected perpetrator themselves where doing so could place anyone at risk.

6. Communication and Awareness

Wharton Global will ensure that employees are made aware of this policy and understand how to raise concerns.

Where the nature of a particular role, supplier relationship or business activity presents a higher level of risk, additional information or training may be provided as appropriate.

We will also communicate our expectations regarding modern slavery and human trafficking to relevant contractors and suppliers where appropriate.

Given the size and nature of our organisation, our approach to awareness and training will be proportionate to the risks identified.

7. Responsibility for the Policy

The Managing Partner has overall responsibility for this policy and for ensuring that it remains appropriate for the size and nature of Wharton Global's business.

Managers are responsible for ensuring that employees and contractors understand their responsibilities and know how to raise concerns.

The policy will be reviewed periodically and following any significant change to the company's operations or relevant legal requirements.

8. Breaches of this Policy

Everyone working for or on behalf of Wharton Global must avoid activity that could result in or contribute to modern slavery or human trafficking.

A breach of this policy may result in appropriate action in accordance with the company's disciplinary procedures or the relevant contractual arrangements.

Where appropriate, serious concerns or suspected criminal activity may be reported to the relevant authorities.

9. Reporting Concerns

If you see, suspect or receive information suggesting that modern slavery or human trafficking may be taking place, you should raise the concern as soon as possible.

Concerns can be reported to:

- Your line manager.
- The Managing Partner.
- Another member of management where it would not be appropriate to raise the concern with your normal reporting line.

Concerns will be treated seriously and, where possible, confidentially.

If you believe that an individual is in immediate danger, you should contact the police or appropriate emergency services.

No individual will be penalised for raising a genuine concern in good faith.

10. Approval

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