

The Modern Slavery Act 2015 requires certain large organisations to produce a statement annually about their efforts in each relevant financial year to eradicate modern slavery and human trafficking in their businesses and supply chains. WDFG UK Limited (the “**Company**”) has produced this statement in compliance with its obligations under Section 53 of the Modern Slavery Act in respect of its financial year ending 31 December 2022.

Our structure, business and supply chain

The Company is the principal UK operating subsidiary of Dufry AG (a company listed on the Swiss stock exchange).

The Company is a leading travel retailer in the UK, and has a significant presence in the UK, employing over 3,500 people, with stores located in 25 airports and 2 train stations. The Company also operates leisure retail shops at Center Parcs in the UK. The Company offers a wide selection of products, mainly in beauty, liquor, tobacco, food and luxury items (such as sunglasses and watches).

The Company’s main airport stores are branded World Duty Free and Biza, which offer a full range of products. In addition, the Company has several specialist and themed stores which includes Glorious Britain (souvenirs), World of Whiskies and Macallan (liquor) and Collections (fashion accessories). The Company also operates some supplier branded stores, such as Jo Malone, Bobbi Brown, MAC, Hermes and Bvlgari.

The Company sources its products from a range of third-party suppliers, who are generally selected by its parent companies, and most of which include highly reputable international brands. The parent companies ordinarily enter into arrangements with the brands and suppliers that covers the supply of products to the Company. If there is no global arrangement, the Company will usually source products direct from the brand or supplier. This largely applies to products that are sourced from UK suppliers.

The Company implements its own supply chain, so that all products are brought in directly from the brand or supplier to the Company’s UK warehouses, to be distributed to the Company’s retail stores.

Our policies

As part of the Dufry group of companies (“**Dufry Group**”), the Company adopts and implements the Dufry Group’s policies. This includes:

- The Code of Ethics; and
- The Sustainability and Integrity in Business Transactions Policy, which incorporates the Dufry Group’s whistleblowing policy and policy governing the procurement of new business partners.

The Company is aware of its responsibility to implement policies and take actions that address the risk of human rights violations and human trafficking, both at its operations and in the supply chain, and follows the approach taken by the Dufry Group in doing so. The Dufry Group is committed to fulfilling the requirements of the UN Global Compact, and in particular to respecting the Universal Declaration of Human Rights adopted by the United Nations General Assembly in 1948 and the International Labour Organization Declaration on Fundamental Principles and Rights at Work adopted in 1998.

The Dufry Group requires all its directors, employees and officers to adhere to the principles stated in the [Dufry Code of Conduct](#) in their interactions with colleagues, customers, business partners and other shareholders.

Dufry's Code of Conduct outlines how the company is committed to act ethically in all aspects of the company and to maintain the highest levels of integrity. Dufry also carries out due diligence on their business partners.

As a step forward towards achieving a more sustainable supply chain, in 2017 Dufry developed its [Supplier's Code of Conduct](#) ("**Supplier Code**"), with the purpose of ensuring that our suppliers across all product categories have in place accepted business standards, as described by the UN Global Compact, regarding: – Ethics and integrity – Labour and employment practices and working conditions – Environmental compliance and sustainability – Product safety and security. In 2018, the Dufry Group started to roll out its Supplier Code to its main suppliers.

This Supplier Code of Conduct, together with the Dufry Code of Conduct, was updated in 2020 to reflect developments in law, regulation and professional ethics, as well as our enhanced commitment to a more sustainable business. In 2022, the Dufry Group approached again the suppliers who previously acknowledged the terms of the Supplier Code, and asked them to re-certify the Supplier Code, and approached additional suppliers to acknowledge and agree to the terms of the Supplier Code. This 2022 recertification cycle of the Supplier Code of Conduct covered 59% of Dufry's procurement budget. As at the end of the financial year 2022, suppliers accounting for 52% of Dufry's overall procurement budget have now accepted or acknowledged the Supplier Code of Conduct. This recertification process will be continued every three years. The Dufry Group will continue to expand the Supplier Code to the suppliers who have not yet signed up to it. Detailed information on the Dufry Supplier Code of Conduct is available on the Dufry Annual Report 2022 on page 93.

We expect all of our suppliers to comply with the principles included in the Supplier Code, as well as to comply with all applicable laws and international best practices in respect of human rights and labour standards, and ultimately to replicate these standards further down their supply chain. Suppliers are required to confirm that they acknowledge, agree to and accept the Supplier Code.

High risk areas identified within our business

While modern slavery can be found in all countries, we take in to account region-specific risks associated with modern slavery, for example, countries with large populations of migrant workers, with weaker employment and labour law enforcement, or where a significant modern slavery prevalence is well known. We understand that countries in our supply chain may present higher risks of modern slavery, requiring additional due diligence and collaboration with our suppliers and business partners.

We also understand and recognise that while modern slavery can also be found among any population, some groups are more vulnerable than others including: foreign migrant workers; contract, agency and temporary workers; refugees, asylum seekers, ethnic and religious minorities and young or student workers.

The Company has identified its smaller local suppliers and consultancies that provide workers as its high-risk areas. These risks are managed by placing anti-modern slavery and human trafficking obligations on these suppliers. We do not employ anyone under the age of 18 in our business, [and we ask our consultancies to confirm that the staff they provide are paid above the minimum wage.]

We are looking into how we can enhance the initial due diligence that we conduct on local suppliers to ensure that there is no modern slavery or human trafficking in their supply chains.

Our Commitment

The Company and the Dufry Group are proud of the progress they have made in regards to the prevention of modern slavery throughout the business. However, they are aware that there is still more progress to be made, and the Dufry Group and the Company are doing the work to make this happen.

Effectiveness of the steps we have taken and how we are measuring these

During the period of 2022, the Company has not been made aware of any existing or previous occurrence of human trafficking or modern slavery within its business or supply chain.

We have no formal KPIs to monitor our progress, but going forward the Company will consider ways in which it can meaningfully measure the progress it has made in monitoring and preventing modern slavery and human trafficking.

Training

The Company does not currently have any formal training in place, but it is looking into implement training for all of its staff, and specialised training for procurement teams and managers in the near future.

This statement was approved by the WDFG UK Limited Board of Directors.

Fred Creighton

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Fred Creighton
CEO, WDFG UK Limited