

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 54 of the Modern Slavery Act 2015 in respect of its financial year ending 31 December 2024.

Our structure, business and supply chain

The Company is the principal UK operating subsidiary of Avolta 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 3,900 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 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 Bulgari.

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 Avolta group of companies (“**Avolta Group**”), the Company adopts and implements the Avolta’s Group’s policies.

In November 2024, the Company adopted the Avolta Group’s new Code of Conduct which replaced the Code of Ethics, and the Sustainability and Integrity in Business Transactions Policy. The Code of Conduct requires all our employees, officers and directors to act ethically and in compliance with all applicable laws at all times including internationally accepted human rights standards. The Code of Conduct further outlines the types of conduct that are not permissible and imposes strict rules in relation to charitable contributions and sponsorships, as well as giving or accepting gifts, hospitality and entertainment, to mitigate the risk of corruption. The Code of Conduct also incorporates the Company’s whistleblowing policy. In addition, the Code of Conduct requires careful due diligence to be conducted on any external partner the Company is working with, including joint-venture partners, business

development consultants, counterparts to M&A transactions and other similar third parties. The Code of Conduct is publicly available on the Company website: www.avoltaworld.com/en/our-impact (Download Section).

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 in its operations and in the supply chain, and follows the approach taken by the Avolta Group in doing so. The Avolta 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 Avolta Group has a set of internal policies and procedures (that have been adopted by the Company), which describe the ethical, social and environmental principles to be applied by its team members at all times and which complement the Avolta Code of Conduct. These policies and procedures address specific topics in the areas of environmental, social, employee and human rights-related matters as well as anti-bribery (among others) and provide guidance on the expected standards and behaviors of employees in their day-to-day work. Furthermore, they are available to all employees through the internal communication tools of the Company or the Avolta Group's corporate website. This set of information includes:

- a) **Avolta Supplier Code of Conduct:** the Supplier Code of Conduct is aligned with the principles of the Employee Code of Conduct and inspired also by the Rio Declaration on Environment & Development (1992), the OECD Convention on Controlling Bribery of Foreign Public Officials in International Business Transactions, the U.S. Foreign Corrupt Practices Act, and the UK Bribery Act (among others). The Code defines the requirements and expected behaviours from the Company's suppliers and sub-suppliers, and it requires suppliers to comply with Avolta's principles in relation to human and labour rights, environmental protection, antibribery & anticorruption, anti-money laundering and anti-terrorism.
- b) **Anti-Corruption and External Partners Policy:** this policy prohibits all forms of bribery and implements other anti-corruption practices. The policy mandates that transactions be accurately recorded and properly documented. External partners must undergo due diligence and pre-clearance before engagement.
- c) **Human Resources Policy:** based on the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and its successor and the ILO Occupational Safety and Health Convention, further complements the Avolta Code of Conduct by detailing behaviors and requirements with respect to legality, diversity, non-discrimination and equal opportunities as axis of conduct to be followed in the selection, hiring, working conditions, and career development processes.
- d) **Reporting channels for potential wrongdoings:** the Company is committed to fostering a culture of transparency and accountability and provides reporting channels through which the Company's employees and third parties can raise concerns about behaviors that may have violated the Code of Conduct or applicable laws and regulations.

This Avolta Supplier Code of Conduct, was initially rolled out in 2018, and then updated in 2020 to reflect developments in law, regulation and professional ethics, as well as our enhanced commitment to a more sustainable business. (https://www.avoltaworld.com/sites/default/files/document/2024-09/Avolta_Supplier_Code_of_Conduct_final.pdf). The certification process advanced further in 2024, with a strategic focus on broadening the scope to include all F&B markets. By the end of 2024, a total of 684 suppliers (2023: 441), representing approximately 60% of the Avolta Group's total cost of goods sold (COGS) (2023: 49%), had signed the Supplier Code of Conduct or got acknowledgement. In the retail sector, the number of certified suppliers was 144 (2023: 157), accounting for 65% of the 2024 retail COGS (2023: 57%).

We expect all of our suppliers to comply with the principles included in the Supplier Code of Conduct, 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 of Conduct.

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 continue to look 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 Avolta Group is committed to upholding and protecting human rights across its operations and supply chain, aligning with global standards to promote ethical practices for employees

and business partners like suppliers and vendors. The Avolta Group is a participant of the UN Global Compact and an active supporter of the UN Ten Principles – encompassing human rights, labour standards, environmental responsibility, and anti-corruption – and aligns its main policies – the Code of Conduct, Supplier Code of Conduct, Human Resource Policy, and practices with the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

The Company is committed to conducting its operations ethically and legally, adhering to business standards and regulations fully respectful of human rights. The Company, and the Avolta Group strictly forbids child labour and forced labour at any of its locations, and this commitment is enforced through clear recruitment procedures and regular workplace controls.

The Company and the Avolta 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 Avolta 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 2024, 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.

To address human rights violations, the Avolta Group has implemented a series of preventive measures to protect both its employees and those within its supply chain. One key measure is the whistleblowing reporting channels for potential wrongdoings, another significant measure adopted by the Avolta Group is risk assessments on its supplier base, leveraging the Ecovadis platform to evaluate potential vulnerabilities. This assessment focused particularly on identifying risks related to child labour and forced labour.

For products sold in the Company's stores, the assessment focused on product categories with higher exposure to the risk of child labour, as identified based on publicly available reports and studies. These include tobacco, food & confectionery, toys and souvenirs, textiles, leather, luggage and electronics. It considered various criteria such as supplier location and the country of production taking into account the UNICEF Child Labour Country Risk Index, as well as financial materiality. Suppliers accounting for approximately 90% of purchase volume from global suppliers in each of the categories were included. Beyond these higher-risk categories, we also assessed our top 200 retail suppliers by purchase volume.

The suppliers with the highest risk exposure as identified in the risk assessment are required to undergo a further screening process facilitated by Ecovadis, including a focused questionnaire regarding the supplier's labour practices. This enables Avolta to gain a deeper understanding of supplier compliance and to identify suppliers in need of further assessment or corrective action. Suppliers for whom a reasonable suspicion regarding child labour is identified are subject to remedial action, including corrective action plans, guidance on compliance and trainings, with progress

monitored by the Avolta Group. Of the more than 700 suppliers assessed, approximately 30 were identified as having the highest risk exposure and were thus selected to undergo the further screening process on child and forced labour facilitated by Ecovadis.

The Avolta Group, and the Company are still considering additional ways in which it can meaningfully measure the progress it has made in monitoring and preventing modern slavery and human trafficking.

Training

The Company provides regular training to its employees to reinforce lawful and ethical behavior, aligning with its Code of Conduct, internal policies, and human rights principles. The Company will continue to review the training it offers its employees, and will consider if specialised training for procurement teams and managers is required.

This statement was approved by the WDFG UK Limited Board of Directors on 23 June 2025.


Fred Creighton (Jun 25, 2025 03:29 GMT+2)
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