

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 2025.

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, employing over 4,000 people, and stores located in 20 airports and 2 train stations. The Company also operates leisure retail shops at Center Parcs in the UK. As part of the wider Avolta group of companies (the “Avolta Group”), the Company draws on the Avolta Group’s global infrastructure and governance framework.

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, which offer a full range of products. In addition, the Company has several specialist and themed stores which include 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 and Hermes.

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 cover 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, the Company adopts and implements the Avolta Group’s policies. The Company operates under the Avolta Group’s Code of Conduct, which requires all 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 certain external partners 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, in which it has participated since March 2020, 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 behaviours 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, anti-bribery and anti-corruption, , anti-money laundering and anti-terrorism. It also sets the standards for product quality and safety, record keeping, and whistleblowing practices suppliers must adhere to.
- 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 undergo due diligence and compliance clearance before engagement, acknowledge Avolta's Code of Conduct and Anti-Corruption and External Partners Policy. Internal audits are conducted to assess compliance, with results reported annually to the Audit Committee.
- c) **People & Culture 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, this policy further complements the Avolta Code of Conduct by detailing behaviours and requirements with respect to legality, non-discrimination and fair opportunities as guiding principles to be followed in the selection, hiring, working conditions, and career development processes. The policy also describes Avolta Group's approach to respecting human rights throughout its operations and business relationships, acknowledging specific differences in each of the countries in which Avolta operates and respecting the regulations applicable in each jurisdiction.
- 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 behaviours that may have violated the Code of Conduct or applicable laws and regulations. Reporting of possible wrongdoings can be done by email to the Compliance Department and through Avolta's global whistleblowing tool, where complaints can be submitted either through the website or by calling one of the country-specific toll-free hotline numbers. The reports are received by the

Compliance Department for further investigation, and the Chief Compliance Officer reports to Avolta's General Counsel, who is a member of the Global Executive Committee.

The 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 the Group's enhanced commitment to a more sustainable business. The Supplier Code of Conduct is publicly available on the Company website in the Downloads section: www.avoltaworld.com/en/our-impact.

In 2023, Avolta launched a new supplier certification cycle following the introduction of its Supplier Code of Conduct. This initiative engaged suppliers across all major retail product categories.

The certification process advanced further in 2024 and 2025, with a strategic focus on broadening the scope to include all F&B markets. By the end of 2025, a total of 912 suppliers (2024: 684), representing approximately 57% of the Avolta Group's total cost of goods sold (COGS) (2024: 60%), had signed the Supplier Code of Conduct or provided acknowledgement. In the retail sector, the number of certified suppliers was 364 (2024: 144), accounting for over 65% of the 2025 retail COGS (2024: 65%).

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 into 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 pay our staff above the minimum wage, and we ask our consultancies to confirm that the staff they provide are paid above the minimum wage.

We remain focused on strengthening the initial due diligence applied to our local suppliers, so that we can be confident their supply chains are free from modern slavery and human trafficking.

Our Commitment

The Company and the Avolta Group are committed to upholding and protecting human rights across their operations and supply chains, aligning with global standards to promote ethical practices for employees and business partners. The Avolta Group is a participant in the UN Global Compact and an active supporter of the UN Ten Principles - encompassing human rights, labour standards,

environmental responsibility, and anti-corruption – the Avolta Group aligns its main policies - including the Code of Conduct, Supplier Code of Conduct, and People & Culture 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 their locations, and this commitment is enforced through clear recruitment procedures and regular workplace audits.

Although the Company and the Avolta Group are encouraged by the progress they have made in preventing modern slavery across the business, they remain conscious that the task is not complete. We are committed to continuing our efforts and driving further improvement in this area.

Steps We Have Taken and How We Are Measuring These

During the period of 2025, 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. In 2025, the Company did not receive any alerts regarding child labour through its reporting channels.

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, which empowers team members, suppliers, and other stakeholders to report any suspected human rights violations through a secure and confidential system.

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 1,000 global suppliers (current and new) assessed, approximately 40 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 also exploring additional approaches that would allow them to assess, in a meaningful way, the progress achieved in monitoring and preventing modern slavery and human trafficking.

Training

The Company provides regular training to its employees to reinforce lawful and ethical behaviour, aligning with its Code of Conduct, internal policies, and human rights principles. In 2025, the Company's employees took part in specialised training on anti-corruption, reinforcing the collective responsibility to maintain a culture of integrity.

This statement was approved by the WDFG UK Limited Board of Directors on 25 June 2026.

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