



Winder Power Limited - Modern Slavery Statement 2026

Introduction

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 for the financial year ending 5th April 2026 and sets out the steps that Winder Power has taken, and continues to take, to ensure that slavery and human trafficking are not taking place in any part of our business or supply chain.

At Winder Power, we are committed to maintaining the highest ethical standards and ensuring that modern slavery, human trafficking, and other forms of exploitation are not part of our operation or supply chain. We are committed to transparency in all areas of our business.

Company Structure and Business

Winder Power is one of the UK's leading manufacturers of Power & Distribution Transformers. We specialise in the design and manufacture of power generation and electrical equipment. Within the group there are three separate divisions, all with market-leading qualities in their respective business areas. These divisions are Power and Distribution Transformers, Transformer Services and PMGs and Exciters. We operate across the UK employing 180 employees. Our supply chain includes raw materials, manufacturing, logistics and distribution.

Our Policies and Commitment to Preventing Modern Slavery

Winder Power operates under a zero tolerance approach to slavery and human trafficking. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our supply chains.

Our key policies include:

- **Modern Slavery Policy:** This outlines our commitment to preventing modern slavery in our operations and supply chains and provides a framework for identifying and mitigating risk.
- **Whistleblowing Policy:** Employees and stakeholders can report any concerns related to modern slavery without fear of retaliation.

Risk Assessment and Management

We recognise that the risk of modern slavery can arise in different areas of our business and supply chain, particularly where there is reliance on temporary, agency or subcontracted labour, complex supply chains, overseas sourcing, raw materials, manufacturing services, logistics, transportation, and lower-skilled or labour intensive work. As a UK manufacturer, we consider these areas as part of our ongoing assessment of potential modern slavery and human trafficking risks.

Our risk assessment process considers factors such as the nature of the goods or services being supplied, the geographical location of suppliers, the use of labour providers or subcontractors, the

level of visibility within the supply chain, and any concerns identified through supplier engagement, audits, employee reports, whistleblowing channels or other due diligence activity.

Where a higher risk is identified, we will take appropriate steps to manage and reduce that risk. This may include further supplier checks, requesting evidence of modern slavery policies and procedures, reviewing contractual terms, seeking confirmation of right-to-work and recruitment practices, engaging with suppliers to understand their controls, and escalating concerns where necessary. We will not knowingly work with any supplier, contractor or labour provider that fails to demonstrate appropriate standards or refuses to address concerns relating to modern slavery or human trafficking.

Due Diligence

During the reporting year, we reviewed our supplier engagement and contractual arrangements to support alignment with our core values and our commitment to preventing modern slavery and human trafficking. As part of this process, suppliers were expected to confirm that they had appropriate measures in place to prevent slavery and human trafficking within their own operations and supply chains, or to comply with Winder Power's standards where their own arrangements were not in place. Anti-slavery expectations were also reflected in supplier terms and contractual arrangements, including requirements that suppliers and their employees must not be involved in slavery, servitude, forced or compulsory labour, or human trafficking.

We continued to work only with reputable employment agencies and labour providers that were able to demonstrate appropriate recruitment, onboarding and right-to-work practices, including awareness of modern slavery obligations. We also provided internal awareness and training to employees to help them recognise potential indicators of modern slavery and human trafficking, understand how concerns may arise in our business or supply chain, and know how to report concerns through the appropriate internal channels.

Performance Monitoring and Reporting

We monitored the effectiveness of the steps taken during the reporting year by reviewing our policies, supplier engagement, contractual arrangements, training activity and reporting channels. This helped us assess whether our controls remained appropriate to the size and nature of our business and whether any further action was required to strengthen our approach to preventing modern slavery and human trafficking.

In assessing effectiveness, we considered a range of indicators, including whether supplier due diligence had been completed where required, whether modern slavery expectations were communicated to relevant suppliers and labour providers, whether internal training and awareness activity had taken place, whether any concerns were raised through management or whistleblowing channels, and whether any supplier or labour provider concerns required escalation.

We will use the following key performance indicators to support ongoing monitoring and continuous improvement:

KPI	Measure	Target / Review Frequency
Supplier due diligence	Percentage of new or higher risk suppliers reviewed for modern slavery risk before engagement or contract renewal.	Reviewed annually, with a target of completing checks for all identified higher risk suppliers.

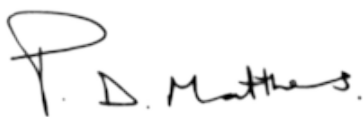
Supplier commitments	Number of suppliers confirming compliance with Winder Power's anti-slavery expectations or providing evidence of equivalent policies and controls.	Monitored as part of supplier onboarding, review and renewal processes.
Training and awareness	Percentage of relevant employees completing modern slavery awareness training or communication.	Reviewed annually, with completion monitored for employees involved in procurement, HR, recruitment, management and supplier engagement.
Concerns and reports	Number of modern slavery concerns raised through management, HR, supplier engagement or whistleblowing channels.	Reviewed at least annually, with all concerns investigated and escalated where appropriate.
Incident response	Number of confirmed incidents, corrective actions, supplier improvement plans or supplier disengagement decisions relating to modern slavery or human trafficking.	Reviewed annually and reported as part of the annual statement review process.
Annual governance review	Completion of an annual review of the modern slavery statement, policies, risk assessment and due diligence activity.	Completed annually before board approval and publication of the statement.

During the reporting year, no confirmed incidents of modern slavery or human trafficking were identified within our business or supply chain. We will continue to review our approach annually and will consider improvements such as enhancing supplier checks, improving supply chain visibility, increasing employee awareness, and recording measurable indicators to support ongoing monitoring and continuous improvement.

Approval and Sign-off

This statement has been approved by the Board of Directors and is signed by the Managing Director of Winder Power Limited.

Signed by:



Paul Matthews

Managing Director – Winder Power Limited

Date: 25 June 2026

Annual Update

This statement will be reviewed annually to ensure its effectiveness and relevance to our business operations and supply chains. We are committed to continuously improving our systems and practices to protect against modern slavery and human trafficking.

* References to 'Winder Power' pertain to Winder Power Limited.