



September 2025

## Modern Slavery Statement

### Introduction

Modern slavery is a global issue, affecting an estimated 45.8 million people across the world. Modern slavery takes many forms including forced labour, trafficking of people of all ages and subjecting people to servitude and slavery for the purpose of exploitation. It is important to note that modern slavery is present within the UK and as a responsible employer, we have to be vigilant to ensure that modern slavery is not present within our business and our supply chain.

The Modern Slavery Act 2015 sets out the requirement for all commercial organisations that meet certain criteria are legally required to create and publish an annual Modern Slavery Statement, detailing the steps it has taken to combat modern slavery and human trafficking within its structure or supply chain. Section 54 of the Act defines a “commercial organisation” as any partnership or body corporate that:

- supplies goods or services; and
- carries on all or part of its business in the UK; and
- has an annual turnover of at least £36 million.

The growth and success of Wren Sterling means that we have now met the threshold that requires us to meet the obligations of the Modern Slavery Act. We have previously recognised our responsibility to take a robust approach by defining a voluntary Modern Slavery Statement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery statement for Wren Sterling Financial Planning Limited and its subsidiaries for the financial year 1st April 2025 - 31st March 2026. It sets out the steps taken to prevent modern slavery and human trafficking in our business and supply chains.

### Our Structure, Business and Supply Chains

Wren Sterling Financial Planning Limited provides holistic, whole-of-market financial planning advice to individuals, businesses, and their customers across the UK.

The Group employs over 400 colleagues in 18 locations nationwide.

Our supply chain consists primarily of professional service providers, technology partners, and office suppliers, which we assess as low risk for modern slavery.

### Policies Relating to Slavery and Human Trafficking

We are committed to acting ethically and with integrity. Our approach is underpinned by the following policies:

- Whistleblowing Policy: Enables staff to report concerns confidentially.
- Supplier Code of Conduct: Requires suppliers to uphold high ethical standards and comply with the Modern Slavery Act.
- Recruitment Policy: Ensures all recruitment is fair, transparent, and conducted through reputable agencies.
- Employee Code of Conduct: Sets expectations for ethical behaviour.



## Due Diligence and Risk Assessment

To identify and mitigate modern slavery risks, we:

- Conduct annual risk assessments of all suppliers using a RAG (Red, Amber, Green) rating system.
- Identify higher-risk areas, such as temporary labour and small local suppliers.
- Require new suppliers to confirm compliance with the Modern Slavery Act 2015.
- Monitor suppliers identified as higher risk and require corrective action where necessary.

## Training and Awareness

All employees will receive mandatory training on modern slavery and human trafficking, including how to identify risks and report concerns. Training is refreshed annually and is available to all new starters. Awareness materials are displayed in all offices and available on our intranet.

## Measuring Effectiveness

Reviewing and updating our risk assessment annually.

- Monitoring completion rates for modern slavery training (target: 100%).
- Tracking supplier compliance and taking action where standards are not met.
- Reviewing any reports or incidents and responding appropriately.

## Incidents

During the reporting period, no incidents of modern slavery or human trafficking were identified within our business or supply chains.



## Continuous Improvement

We are committed to continuous improvement and will:

- Regularly review and update our policies and procedures.
- Enhance supplier due diligence where necessary.
- Continue to raise awareness and provide training to all staff.

## Board Approval and Signatures

This statement covers Wren Sterling Financial Planning Limited and its subsidiaries and was approved by the Board of Directors on 30th September 2025.

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| <b>James Twining</b>  | <b>Steve Williams</b>  |
| <b>Chief Executive Officer</b>  | <b>Director of Human Resources</b>   |
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