



September 2026

Modern Slavery Statement

Introduction

Modern slavery is a serious and often hidden crime in which people are exploited for personal or commercial gain. It includes forced labour, human trafficking, servitude and slavery, and can affect people of any age or background. Although it is a global issue, modern slavery also occurs in the UK and may be concealed within legitimate businesses and complex supply chain. Its severe impact on individuals and communities means we must remain vigilant, understand where risks may arise and take appropriate steps to prevent exploitation within our business and supply chain.

The Modern Slavery Act 2015 sets out the requirement that all commercial organisations meeting 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 this is the second year that we have met the threshold that requires us to formally meet the obligations of the Modern Slavery Act. We have previously voluntarily published a modern slavery statement before becoming legally required to do so.

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 1 April 2026 - 31 March 2027. It sets out the steps taken to prevent modern slavery and human trafficking in our business and supply chain.

Our Structure, Business and Supply Chain

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 470 colleagues in 22 locations nationwide.

Our supply chain continues to consist primarily of professional service providers, technology partners, and office suppliers, which we assess as low risk for modern slavery, however we acknowledge certain supplier categories may require ongoing monitoring, especially when onboarding new suppliers.

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

During the previous financial year, Wren Sterling undertook a comprehensive review of its supplier population, introducing a structured risk assessment framework to evaluate potential modern slavery risks across our supply chain.

The review included:

- Conducting annual risk assessments of all suppliers using a RAG (Red, Amber, Green) rating system.
- Identification of higher-risk supplier categories, including recruitment, temporary labour, cleaning, facilities management and contractor-based services.
- Analysis of supplier geography, industry sector and nature of services provided.
- Monitoring of suppliers identified as higher risk that require corrective action where necessary.

Training and Awareness

During the current reporting period, Wren Sterling completed the initial rollout of annual mandatory Modern Slavery and Human Trafficking awareness training to all employees. The training provides colleagues with an understanding of the indicators of modern slavery, the risks that can arise within businesses and supply chain, and the reporting channels available should concerns be identified.

Modern slavery awareness is now embedded within our onboarding process for new starters and forms part of our wider compliance and governance framework. Throughout the year, employees have continued to have access to supporting guidance, awareness materials and our whistleblowing arrangements through the Company intranet.

Measuring Effectiveness

We continue to review and update our risk assessment annually. This includes the following activities:

- Annual supplier risk assessments and reviews.
- Completion and outcomes of supplier due diligence activity.
- Monitoring of higher-risk suppliers and any remediation actions identified.
- Annual review of employee awareness and reporting arrangements.
- Review of whistleblowing reports and other concerns relating to potential modern slavery risks.
- Annual review of this statement and supporting governance documentation.

Incidents

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

Continuous Improvement

We are committed to continuously strengthening our approach to identifying, preventing and mitigating the risk of modern slavery within our business and supply chain. During the forthcoming financial year, Wren Sterling will focus on embedding the controls introduced during this reporting period and enhancing our supplier assurance processes.

Our priorities for the coming year include:

- Completing enhanced due diligence activity for suppliers identified as presenting a higher potential risk.
- Further improving supplier data quality and risk classification processes to support effective risk monitoring and governance.
- Implementing a formal supplier onboarding and assurance process requiring suppliers to confirm compliance with the Modern Slavery Act 2015 and complete due diligence questionnaires appropriate to their risk profile before engagement.
- Strengthening oversight of suppliers with international operations or more complex supply chain where appropriate.



- Maintaining employee awareness through targeted communications and ongoing awareness initiatives.
- Reviewing the effectiveness of our supplier assurance framework and identifying opportunities for further improvement.

By continuing to enhance our governance, due diligence and supplier management processes, we aim to ensure that modern slavery risks remain appropriately identified, assessed and managed across our business and supply chain.

Board Approval and Signatures

This statement covers Wren Sterling Financial Planning Limited and its subsidiaries and was approved by the Board of Directors on 29 September 2026 and signed on their behalf by the following Directors:

James Twining	Steve Williams
Chief Executive Officer	Director of Human Resources
	

