

Charles Wells Ltd

Modern Slavery and Human Trafficking Statement

This statement is issued in accordance with section 54 of the Modern Slavery Act 2015.

Charles Wells Ltd is committed to ensuring that all of its business operations are free from involvement with slavery or human trafficking.

As a family owned business we take issues of modern slavery and human trafficking very seriously and expect our employees to raise any concerns they have, or observe, with their immediate manager, a Director of the Company or the appropriate authority. We are committed to taking all reasonable steps to ensure our business is free from modern slavery and human trafficking at all levels.

This statement will be reviewed annually.

Organisational Structure and Supply Chain

The business is built around; brewing beer, operating managed houses in the UK and France and tenanted and leased pubs predominantly situated in the Midlands and the South East of England.

We directly employ in the region of 792 employees within the business.

Wells' beer brands are produced at the Company's Brewery, Brewpoint based in the UK.

We also obtain other drinks products for consumption in our UK pubs principally from one supplier. The products purchased from this supplier are almost exclusively (with the exception of some wine and spirit products) purchased from within the UK or the European Union and this Supplier routinely audits their supply chains.

For use within our French Pubs we also obtain other drinks products principally from a single source supplier who's supply chain is within the European Union.

Food products for use within the managed pubs in the UK and France, are sourced from within those countries respectively. We also expect that food suppliers have applicable Anti-Slavery and Human Trafficking policies and procedures in place.

We obtain a very small percentage of items of clothing, point of sale merchandise and promotional materials from outside of the UK and the European Union with a slightly increased risk for slavery and human trafficking issues.

Due Diligence:

The business will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.

We will expect all who have, or seek to have a commercial relationship with Charles Wells to familiarise themselves with The Modern Slavery Act and our anti-slavery values, and act consistently within these.

We have in place an internal Whistle Blowing policy to encourage employees to report concerns.

Processes and procedures are in place to ensure that all of our employees are legally entitled to work within the UK and France respectively. Employees are paid in accordance with the rates of pay that are no less than the statutory legal minimums. We endeavour to pay employees only into a bank account held in their own name.

We have a specialist Purchasing Manager and together with the Company Secretary our major supplier contractual Terms and Conditions are routinely reviewed to ensure:

- That we assess the level of risk of exposure from that supplier.
- That through contracted terms our suppliers confirm that they understand the compliance measures under the Modern Slavery Act 2015
- That we will not knowingly trade with any organisation where slavery or human trafficking are involved in the supply chain at any point

Communication:

We will routinely review this policy and make employees aware of any policy and compliance changes.

We seek to maintain open communication with our contractors, suppliers and business partners regarding our values and expectations.

Our Policy on Modern Slavery and Human Trafficking

We will maintain a zero tolerance of modern slavery and human trafficking and we expect all those in our supply chain and service providers to comply with the Modern Slavery Act, and to report any issues to us and the relevant authority.

If a supplier is found to be demonstrating unacceptable practices they will be removed from our supplier list and reported to the relevant authority.

Company policies are in place to support our stance and to assist us in the assessment and prevention of modern slavery in our organisation and supply chain. Such policies include:

- Anti-Bribery and Corruption Policy
- Grievance Policy
- Whistle Blowing Policy
- Purchasing Terms and Conditions

Approval

This statement has been approved by the company's board of directors.

A handwritten signature in black ink that reads "AR Fryer". The signature is written in a cursive, slightly slanted style.

Name: Anthony Fryer
Position: Chief Finance Officer
Dated: 17 April 2026