

Modern Slavery Statement 2026/27

Our Commitment

At Wilson James, doing business in the right way is integral to who we are, and we believe that respect for human rights is fundamental to our core values and the way in which we conduct our business. Modern Slavery, in all its forms, is a grave violation of these human rights and an affront to human dignity. We are committed to playing our part in eradicating these practices and ensuring that our operations and supply chains are free from Modern Slavery.

As CEO of Wilson James, I am dedicated to sustaining an organisational culture that prioritises ethical behaviours, transparency and accountability. Our commitment to combating Modern Slavery is integral to our broader ambition to be a responsible and sustainable business. We understand that Modern Slavery is a complex and ongoing challenge, which is why we are committed to continuously improving our policies, processes and practices to ensure they are robust and effective.

Our efforts are guided by national and international frameworks including the United Nations Guiding Principles on Business and Human Rights, and the Modern Slavery Act 2015. Where possible, we also seek to collaborate with industry peers, policymakers and other stakeholders to amplify our impact and contribute to broader systemic change. .

As part of Wilson James’ efforts to monitor and reduce the risk of modern slavery and human trafficking occurring within our business and supply chains, we seek to:

- Design our recruitment processes so that they are transparent and regularly reviewed. This includes having robust vetting processes for the appointment of our colleagues.
- Raise awareness of modern slavery amongst our people and our suppliers to help them be alert to the hidden nature of modern slavery.
- Challenge and support our suppliers in the effort to drive out modern slavery and human trafficking; and
- Apply the spirit, as well as the letter of the law, to our internal practices.

We take the following actions to ensure Wilson James prevents modern slavery or human trafficking:

- Provide mandatory Modern Slavery training for all staff in management positions in 2026/27.
- Provide awareness training to all our colleagues in 2026/27.
- Implement Supply Chain Risk Assessments prior to appointment of suppliers.
- Regularly review our recruitment and vetting processes.
- Benchmark our approach to managing the risk of modern slavery.

This statement is communicated to all persons working under the control and supervision of Wilson James so that they understand and support our commitment to ensure that Wilson James’ reputation never becomes tainted by association with modern slavery or human trafficking.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Wilson James Limited’s slavery and human trafficking statement for the period 1 August 2026 to 31 July 2027.

Together, we can make a significant difference in the fight against Modern Slavery and uphold the rights and dignity of all individuals involved with our business.



Mark Dobson
Chief Executive Officer

Wilson James

Highlights from FY 2025/26



Our Modern Slavery Working Group continues to bring together colleagues with responsibility and influence in this area so that we can take a planned approach and make further progress. The Group reports annually to the Risk & Audit Committee.



We have continued to develop employee engagement, conducting our business-wide WJ Viewpoint survey for the second year and providing employees with another channel to communicate with us.



We have conducted a risk assessment on our recruitment processes, and our Inclusion Steering Group is overseeing work to ensure that these processes are as inclusive as possible.



We have launched a new Wellbeing strategy and delivered Manager awareness training on Wellbeing and Mental Health as well as Mental Health First Aider training.



We have progressed our Inclusion commitments by accrediting to the Inclusive Employers' Standard, achieving the Bronze level. This reflects our achievements and also points to an action plan for further progress.

Our Organisational Structure

Wilson James is a security, logistics, technology, and people solutions provider. Privately owned since its foundation in 1991, in January 2026 Wilson James became an employee-owned business held through an Employee Ownership Trust. We are immensely proud to be employee owned and see this becoming a key feature of how we approach everything that we do.

Since 1991, we have grown our organisation from a small Essex-based outfit to a business turning over £350m per annum and counting leading British and global brands in its prestigious client base. Our solutions range from bespoke consultancy and analysis to supply chain and material management, as well as integrated security, technology, and logistics solutions.

Our colleagues can be found supporting a variety of operations including those at national infrastructure projects, high profile cultural heritage institutions, and securing passenger safety and assistance at the UK's largest airports.

We are dedicated to the creation of safe, secure, and logistically efficient workplaces; delivered with passion and pride, through people and technology. We aim to be our client's first choice in partnerships in all our business activities, an employer of choice for the industries we serve, and a client of choice to our supply chain.

We know that delivering on this aim requires a well-trained and motivated workforce and a robust, trusted supply chain. It also requires us to source expert partners with rigorous commitments to excellence and to conduct business responsibly.

Wilson James

Values & People

Our core values are the heart of our brand and inform activity at every level of our operations. They are Honesty, Respect, Safety, Responsibility and Communication.

These values guide our investment programme, our people offering and resources, our bid activity, and our client and supplier relationships. They are the standard by which we measure ourselves, and by which we evaluate potential service partners.

They also inform specific evaluation criteria, e.g., the ability to measure environmental impact, demonstration of product quality and responsible sourcing/production, transparency in reporting where required.



Honesty

We are fair and honest in all our activities.



Respect

We treat each other with dignity and respect.



Safety

We will continuously develop safe systems of work.



Responsibility

We are responsible for all our actions and accountable for their consequences.



Communication

We have an environment that enables and supports communication.

Wilson James

Values & People

Wilson James employs over 5,200 people across a range of specialist services, including Security, Aviation, Logistics, Infrastructure, Technology and Advisory Services. We serve over 250 clients across 300 site locations within the UK and Northern Ireland; together they make up our large diverse customer base of professional organisations.

We are proud to be recognised by the Living Wage Foundation as a Living Wage Recognised Service Provider. This means we pay the real Living Wage to our colleagues working on our own sites and we always supply a Living Wage bid option alongside every market rate submission to all current and prospective clients.

We directly employ most of our workforce. We conduct robust checks on any new employee including eligibility to work in the UK and adherence to the BS7858 standard where appropriate to safeguard against human trafficking or individuals being forced to work against their will.

Where we supplement our directly employed workforce with agency labour, we use only specified and reputable employment agencies to source labour and always verify the practices of any new agency prior to accepting workers.

We recognise that modern slavery risks can be heightened in labour-intensive services, lower-paid roles, agency labour arrangements, subcontracted services and complex supply chains. Our approach is therefore risk-based, with particular attention to recruitment, right-to-work checks, working time, pay, agency labour, supplier onboarding and ongoing supplier assurance.

Our Inclusive Recruitment Pillar is a core part of our strategic approach to inclusion. We have processes and training in place to ensure our recruitment is fair, inclusive and barrier-free, supporting ethical recruitment practices, reducing the risk of exploitation, and attracting talented people from a wide range of backgrounds.

We are proud of our inclusion agenda and have ambitious plans to build a culture of diversity and inclusion where the unique experiences, skills and insights of our people are valued and included, making our business stronger, more innovative and more insightful.

Our people networks help us create this culture, energising our work in areas which support the prevention of modern slavery, including domestic abuse and violence against women and girls. In 2025 we assessed our performance against the Inclusive Employers Standard and were proud to be accredited at Bronze level in early 2026; we see this as a step, not the end, and intend to progress to a further review in two years.

We want our employees to have a voice and believe this can help to prevent modern slavery. We conducted our business-wide WJ Viewpoint survey for the second time this year and are committed to repeating this on an annual basis. This year the response rate doubled to 29% and the engagement score increased to 59%.

Our Wellbeing Strategy also plays an important part in preventing modern slavery. We have refreshed this and are working towards our goal that we will create a living culture where Wellbeing is at the heart of the way we make decisions, how we work and in our delivery to our clients and intend that we make methodical progress in this area.

Supply Chain

We believe that our suppliers are integral to our success. Our suppliers help us enhance our business and values and we are committed to ensuring that together we are a force for good. For this to happen, we need to select, engage and treat our suppliers fairly and responsibly. Equally we expect our suppliers to be legally compliant, ethical and sustainable.

This matters because good, professional relationships with our suppliers are key to our service delivery. Our suppliers are an extension of our business, and we want them to be and bring their best. That is why it is important that we are open and inclusive about the way we select, engage, and manage our suppliers, so that it provides a solid foundation to listen and implement innovation.

What it means

We select business partners fairly and objectively against our criteria to confirm suitability for us to engage and contract. This includes ethics, sustainability and Privacy & Data Governance.	We seek to put in place commercial and contractual conditions that fairly reflect the specific requirements of the procurement and market conditions.	We pay our suppliers on time.
We treat our suppliers with dignity and respect and foster an inclusive working environment.	We incentivise sustainable strategies among our suppliers, monitor their performance and drive positive change wherever we can.	We monitor and audit our suppliers through the life of the contract to provide assurance that our suppliers are compliant partners in our service delivery.

Launched this year

01

Built on the refresh of our supplier due-diligence questionnaire. This version of the Wilson James supplier due diligence questionnaire digs deeper into policy and supplier make-up so that we can understand better our supplier risk exposure.

02

Reinforced the alignment of our sustainable procurement strategy to ISO 20400 to help us embed sustainability into every aspect of the procurement lifecycle.

Our Modern Slavery Supply Chain Roadmap

Targeted assurance

Use the findings from our category review to introduce more targeted due diligence, strengthen risk-based supplier assurance and improve visibility of modern slavery risk across higher-risk supply chain categories.

2026/27

Embedded supplier management

Embed modern slavery considerations into routine supplier management, use assurance findings to agree corrective actions and strengthen the link between supplier performance, ethical procurement and contract review.

▶ ▶ ▶ 2027/28

Measured improvement

Review the effectiveness of supplier due diligence and assurance activity, refine our risk indicators and use management information to target further improvement across our supply chain.

▶ ▶ ▶ 2028/29

Continuous improvement

Continue to raise expectations across our supply chain, monitor corrective actions through governance reporting and update our approach as risks, legislation and good practice evolve.

▶ ▶ ▶ 2029 onwards

Our key focus for FY 2026/27 is to build on the deeper analysis of higher-risk supply chain categories undertaken during FY 2025/26. We will use this work to introduce more targeted due diligence and strengthen risk-based supplier assurance.

Our Training

Leadership at all levels is key. This statement sets out the Board’s commitment to improving the skills and awareness of our colleagues so that they can be vigilant and act when required. We believe that improved awareness is one of the most effective methods of preventing modern slavery.

We mandate annual training on modern slavery for all staff in management positions. Our training covers:

- What is meant by modern slavery.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within our organisation.
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and “Stronger together” initiative.

As well as training staff in management positions, we will continue to provide ‘toolbox’ training to all our colleagues.

The training explains to staff:

- The basic principles of the Modern Slavery Act 2015.
- How to identify the signs of slavery and human trafficking.
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

This training, together with the training provided to managers, will be delivered through our Learning Management System. This platform delivers learning, development and training to our colleagues and represents a significant investment in ensuring that they understand their part in preventing modern slavery.

We will also raise awareness during Anti-Modern Slavery Week in October 2026.

Performance Indicators

We have reviewed our key performance indicators (KPIs) for FY 2026/27. These indicators are designed to measure the effectiveness of our awareness activity, training, employee engagement, supplier due diligence, risk-based assurance and governance oversight. As a result, we are:

Progress against these indicators will be reviewed through the Modern Slavery Working Group and reported to the Risk & Audit Committee. Where completion rates, audit findings or supplier responses indicate areas for improvement, we will agree corrective actions and track these through the appropriate governance route.



delivering an awareness campaign to coincide with Anti-Modern Slavery Week in October 2026 (KPI: issued to 100% of managers and 75% of managers attend or view the webinar).



requiring all managers to complete our modern slavery training module by 31 July 2027 (KPI: 95% of managers complete the training module).



requiring directly employed colleagues to complete our modern slavery toolbox training by 31 July 2027 (KPI: 75% of directly employed colleagues complete the toolbox training).



deploying our WJ Viewpoint survey, building on last year's achievement (KPI: achieve a 35% response rate).



requiring new suppliers to complete modern slavery due diligence before onboarding (KPI: 100% of new suppliers complete due diligence unless an approved exception is recorded).



completing a risk-based review of higher-risk supply chain categories by 31 July 2027 (KPI: findings documented and actions recorded for suppliers requiring further assurance).



undertaking targeted assurance activity for a defined sample of higher-risk suppliers during FY 2026/27 (KPI: assurance completed and follow-up actions tracked where required).



completing an annual assurance review of approved agency labour providers (KPI: review completed, including right-to-work, pay, working time and worker welfare controls).



recording and reviewing any modern slavery concerns, referrals or whistleblowing reports through the appropriate governance route (KPI: agreed actions tracked to closure).



providing an annual modern slavery update to the Risk & Audit Committee (KPI: update includes progress against KPIs, supply chain assurance findings and any reported concerns).

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

Policies

The Chief of Staff will ensure that appropriate policies are in place to support good governance of the Company’s approach to anti-modern slavery.

Risk assessments

The Company operates a risk management procedure which is overseen by the Risk & Audit Committee, a sub-committee of the Executive board. The board is chaired by a non-executive director who is Whistleblowing champion. The committee will receive an annual update on Modern Slavery.

The Company will conduct a benchmarking exercise at the start and end of the year using the Stronger Together Labour Provider good practice check list.

Investigations/due diligence

Our Internal audit team conduct site, agency, and supplier audits. Suppliers are required to evidence their compliance with legislation during our onboarding process.

Training

The Chief of Staff oversees the planning and delivery of modern slavery training for managers through our Learning & Development function, alongside this year’s awareness programme for all employees.

Policies

Our Sustainable Ethical Procurement Policy sets out our legal and moral expectations of our suppliers for regulatory compliance, employment, right to a living wage, avoidance of excessive hours, protection from discrimination and provision of a safe and healthy working environment. Wilson James holds itself to these same standards and has an effective internal audit system to ensure that we do not fall short.

Our Supply Chain Code of Conduct This is a version of the Wilson James Code of Conduct cascaded to our suppliers so that they understand how we discharge our corporate and ethical responsibilities. This code is also available on our supplier microsite and referenced in our standard terms and conditions.

Our Code of Conduct sets out our standards and expectations about behaviour and conduct to all our colleagues and suppliers. Our Code of Conduct is supported by our Employee Handbook which provides further information.

Our Working hours policy details procedures in place to monitor compliance with the Working Time Regulations.

Our Whistleblowing & Disclosures in the Public interest policy encourages all our employees, clients and business partners to report any concerns related to the direct activities of the company or those of its supply chain.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company’s Whistleblowing procedure is designed to encourage and protect those who come forward and is supported by a reporting hotline, which is independent and confidential.

Our Equality Diversity & Inclusion policy mandates the application of equal opportunities in all aspects of recruitment.

Policies related to this Statement:

[Code of Conduct](#)
[F05 Sustainable Ethical Procurement](#)
[G07 Sustainability](#)
[G09 Ethics](#)
[G20 Modern Slavery](#)
[HR09 Equality Diversity & Inclusion](#)
[Supply Chain Code of Conduct](#)

For more information about
our Modern Slavery Statement
please contact us