



## **Modern Slavery Act Transparency Statement**

### **For the Financial Year Ending 31 December 2024**

This statement is published by Woodside Group Holdings Limited on behalf of itself and its subsidiary companies (together, “Woodside” or the “Group”) in accordance with the requirements of Section 54 of the Modern Slavery Act 2015. It outlines the actions taken across the Group during the financial year ending 31 December 2024 to prevent modern slavery and human trafficking in our business operations and supply chains.

#### **Our Commitment**

Woodside has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We recognise our responsibility to uphold human rights and promote ethical conduct in line with the FCA’s Consumer Duty and Principles for Businesses, particularly:

- Principle 1: Integrity
- Principle 6: Customers’ interests
- Principle 8: Conflicts of interest
- Principle 11: Relations with regulators

#### **Our Business and Structure**

Woodside is a UK-based corporate and financial services provider. Woodside Group Holdings Limited is the parent company of the Group, comprising:

Woodside Secretaries Limited, which provides corporate services including company incorporations, registrar, company secretarial and corporate compliance services. It is also parent company to a number of nominee entities which hold assets on behalf of clients.

Woodside Corporate Services Limited, which is authorised and regulated by the Financial Conduct Authority (FCA) to provide custody services (safeguarding and administration of client money and assets).

Woodside operates across the UK and may engage with third-party service providers in the UK and internationally. While we consider the risk of modern slavery within our direct operations to be low, we recognise potential risks within parts of our supply chain and are committed to maintaining high ethical standards throughout the Group.

#### **Policies and Controls**

Woodside has established a consistent framework across its entities to address the risk of modern slavery and promote ethical conduct, including:

- Modern Slavery Policy, applicable group-wide
- Employee Handbook and Compliance Manual, setting out our expectations for employee conduct, equal treatment, and labour rights
- Anti-Financial Crime Framework Manual, setting out our approach to tackling financial crime. We would consider the country’s risk level of modern slavery or human trafficking when determining the jurisdiction risk



- Whistleblowing Policy, providing a secure and confidential channel for raising concerns. Employees are aware of the clear expectation that they are required to report any suspicious about a danger, risk of wrongdoing, or criminal activity (like modern slavery).
- Third-Party Supplier Due Diligence Procedures, integrated into onboarding and renewal processes to assess modern slavery risk and broader ESG factors

These policies are supported by oversight from Woodside's Compliance, HR and Risk functions and reviewed annually to ensure continued relevance.

### **Risk Assessment and Due Diligence**

Each entity within the Group conducts proportionate due diligence when engaging third-party suppliers, with centralised support from the parent company. Our key areas of focus include:

- Outsourced IT and operations services
- Office and facilities management
- Contractors or consultants operating in high-risk jurisdictions or industries

Where appropriate, suppliers are required to demonstrate their compliance with applicable laws, including the Modern Slavery Act, as part of contractual agreements.

### **Training and Awareness**

Woodside employees receive training on modern slavery and ethical business conduct through mandatory compliance modules. Our Employee Handbook and Compliance Manual reinforce this training with clear expectations regarding fair treatment, reporting mechanisms, and the importance of upholding human rights.

Enhanced awareness is provided to staff with responsibility for supplier engagement, HR, and compliance.

### **Measuring Effectiveness**

We assess the effectiveness of our approach to modern slavery risk by:

- Monitoring internal and third-party risk assessments
- Reviewing the operation of our whistleblowing procedures (no modern slavery concerns were reported during the financial year)
- Conducting regular policy reviews
- Tracking supplier compliance performance during contract lifecycles

### **Governance and Approval**

Oversight of modern slavery risk and compliance is provided by the Board, supported by the Risk and Compliance Committees. This statement has been approved by the Board of Directors and covers all wholly-owned subsidiaries of the Woodside group.

It is reviewed and published annually in line with statutory requirements.

A handwritten signature in black ink, appearing to be "Anna Long".

Anna Long, Director

On behalf of the Board of Woodside Group Holdings Limited

28 April 2025