

Modern Slavery and Human Trafficking Statement

(Financial Year 2025/2026)



1. Introduction

This Modern Slavery and Human Trafficking Statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 (“the Act”) and constitutes Whale Tankers Limited’s slavery and human trafficking statement for the financial year ending 5th April 2026. This statement sets out the steps taken to prevent modern slavery and human trafficking in our business and supply chains.

Whale Tankers Limited (“Whale”, “we”, or “the Company”) is a leading UK based manufacturer of liquid waste vacuum tankers and jetting equipment. Our headquarters and primary manufacturing facility are based in Solihull, UK, with sale and exports to international markets.

We are committed to acting ethically, with integrity, and with respect for human rights in all aspects of our operations.

2. Organisational Structure and Supply Chains

Whale is incorporated and headquartered in the United Kingdom. We design, engineer, manufacture, and supply liquid jetting and vacuum tanker products and associated parts. Most manufacturing processes are carried out in-house, with components, materials, and specialist services sourced from suppliers both in the UK and internationally.

Our supply chains include:

- ❖ Raw material and component suppliers
- ❖ Subcontracted specialist manufacturing services
- ❖ Logistics and freight providers
- ❖ Agency and temporary labour providers

We recognise that modern slavery risks can arise everywhere in a supply chain, particularly in sectors involving labour-intensive processes or overseas suppliers.

3. Policies and Accountability

We maintain a zero-tolerance approach to modern slavery and have implemented the following internal policies to support our commitment to preventing modern slavery:

- ❖ **Modern Slavery and Human Trafficking Policy** – zero tolerance approach to modern slavery and human trafficking.
- ❖ **Supplier Code of Conduct** – sets expectations for ethical business practices and compliance with all applicable labour standards.
- ❖ **Employee Code of Conduct** – outlines expected behaviours of employees in accordance with applicable laws and human rights standards.

- ❖ **Whistleblowing Policy** – provides a secure mechanism for employees and third parties to raise concerns about unethical conduct, including modern slavery.

4. Due Diligence

We undertake risk-based due diligence on suppliers, particularly where there is a higher risk of modern slavery:

- ❖ Per-qualification screening for compliance with labour and human rights laws.
- ❖ Contractual requirements obliging suppliers to comply with the Modern Slavery Act and related standards.
- ❖ Supplier assessments that evaluate compliance and risk factors.
- ❖ Ongoing performance monitoring and targeted audits where appropriate.

These actions are aligned with the Home Office's practical guidance on supply chain transparency and due diligence expectations.

5. Risk Assessment and Mitigation

We have identified the following risk areas for modern slavery exposure:

- ❖ Suppliers in higher-risk jurisdictions
- ❖ Outsourced services with complex subcontracting structures
- ❖ Labour procurement via third parties

To mitigate these risks, we incorporate ethical criteria into supplier selection, prioritise responsible suppliers, and engage directly with suppliers regarding expectations and improvements.

6. Training and awareness

We provide training to relevant staff on:

- ❖ Identifying potential signs of modern slavery
- ❖ Our reporting procedures
- ❖ Ethical procurement practices

Training is delivered to relevant employees including, procurement, HR, and management teams and is reviewed periodically to reflect emerging risks and best practice.

7. Managing Effectiveness

We monitor the effectiveness of our approach through:

- ❖ Tracking supplier compliance and corrective actions
- ❖ Conducting internal reviews and audits
- ❖ Monitoring training completion and understanding

We are committed to continual improvement in our processes and controls.

8. Reporting and Governance

All concerns relating to modern slavery or human trafficking are taken seriously and investigated promptly. Employees and suppliers can raise concerns through internal reporting channels or anonymously via the whistleblowing mechanism.

This statement has been approved by the Board of Whale Tankers Limited in accordance with Section 54(6) of the Act and is signed on its behalf by a Director.

Signed:

A handwritten signature in black ink, appearing to read 'Gregg Horne', written in a cursive style.

Name: Gregg Horne

Title: Operations Director

Date: 30th January 2026