

A close-up, low-angle photograph of several parallel steel rebar rods. The rods are arranged in a grid pattern, with their characteristic circular ribs clearly visible. The lighting is dramatic, coming from the side, which creates strong highlights on the top edges of the ribs and deep shadows in the valleys, emphasizing the texture and three-dimensional quality of the metal. The background is slightly blurred, focusing attention on the foreground rods.

***Wincanton***

## Speaking Up Policy

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## Policy Statement

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At Wincanton, we are committed to conducting our business with our stakeholders (employees, customers, suppliers, shareholders, the communities and environment in which we operate) in a lawful and ethical manner. We believe this will encourage and maintain the highest possible standards of work ethics, including honesty, openness and accountability.

### Scope

All colleagues, officers, consultants, contractors, graduates, casual and agency workers are collectively referred to here as “workers” (but not expressly or impliedly classifying any such individuals as workers for the purposes of any employment legislation or regulation) and are required to act in an ethical and honest way in all business and employment matters.

Workers are required to comply with this Policy, the ‘Wincanton Way’ Code of Conduct, the Anti-bribery & Corruption Policy and any other policy setting out standards of conduct required from our workers.

Workers are often the first to recognise when these standards are not being met. Workers are therefore encouraged to report any concerns about the behaviour of Wincanton or anyone acting on its behalf that falls short of these key business principles.

### Purpose

The purpose of the Speaking Up Policy is to:

- **clarify** what Speaking Up is; and
- **explain** what workers (in the broadest sense) are required to do, and how and to whom concerns should be reported.

### Objectives

The Policy objectives are to:

- **encourage** an open and protected environment for concerns to be raised, investigated and properly addressed, without fear of reprisal, criticism or discrimination;
- **give assurance** of our commitment and support for workers to make fair and prompt disclosure of events or circumstances where a worker believes that Wincanton or another worker is involved, and which should be disclosed (see page 2) by appointing a dedicated Whistleblowing Officer (the Company Secretary); and
- **provide** workers with the confidence to report in good faith any genuine concerns and voice worries at an early stage, confidentially, and without fear of repercussion or retaliation, even if they turn out to be mistaken.

By promoting and supporting this Policy, we want to encourage open and honest communication to ensure Wincanton and all its workers operate its business ethically and with integrity.

## ONE PAGE POLICY

If you think something is wrong, help us to help you: Speak Up

Speaking Up is the right thing to do

By speaking up, you can help develop our ethical and open culture

We want to know, so we can take action

You don't have to give your name - call or go online

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UK



**Report your concerns in confidence**

If you see or suspect wrongdoing, speak up. It's free, secure and we're available 24/7.

**How to contact us**

📞 0800 086 8226

🌐 [wincanton.ethicspoint.com](http://wincanton.ethicspoint.com)

Republic of Ireland



**Report your concerns in confidence**

If you see or suspect wrongdoing, speak up. It's free, secure and we're available 24/7.

**How to contact us**

📞 1800 851 665

🌐 [wincanton.ethicspoint.com](http://wincanton.ethicspoint.com)



## What is Speaking Up?

Speaking Up, also known as whistleblowing, is the disclosure of information about actual or suspected malpractice, wrongdoing, danger or breaches of policy or regulations in relation to Wincanton's business activities and the conduct of those activities.

Reports should be made in good faith; the reporter does not need to have evidence of the wrongdoing but must 'reasonably believe' that the allegations are substantially true. Reports should not be made for the purposes of personal gain.

## Protected Disclosures

Under the Public Interest Disclosure Act 1998, a worker reporting concerns that tend to show one or more of the following criteria (Protected Disclosures) has the right not to suffer detriment as a result of speaking up:

- Any criminal offence/act that has been or is likely to be committed (for example fraud, corruption, bribery, blackmail or any other financial irregularity).
- Any breach or intended breach of a legal or professional obligation (contractual or civil).
- Any miscarriage of justice.
- Any act or action that could jeopardise the health, safety, human rights or well-being of a person or group of people.
- any act that could damage, or is damaging, the environment.
- deliberate concealment of any information relating to any of the above.

## What is 'detriment'?

Detriment means someone being treated worse than before of having their situation made worse, because they made a disclosure. Examples of detriment can include but are not limited to bullying, reduction of hours, training requests refused without good reason.

## Confidentiality and protection of workers

Wincanton recognises the concerns and sensitivities of raising such issues and will protect the identity of the worker who has reported the matter and treat details of the investigation with the utmost confidence. No action will be taken against them, nor will there be any threat to their future career prospects either with Wincanton or for future references for external positions.

The law offers a good measure of protection to those who raise genuine concerns about wrongdoing, in the public interest, whatever the outcome of the investigation.

Any worker who believes that they have suffered detrimental treatment as a result of raising a concern should inform the Whistleblowing Officer.

Any attempt by anyone within Wincanton to deter, threaten or seek to bribe a worker to prevent or discourage them from making a report, or any victimisation of a worker because they have made a report, will be treated as a serious disciplinary offence and may lead to dismissal and further action.

Other employees must not attempt to identify reporting persons. Attempts to do so may result in disciplinary action.

## Communication with workers

All reports case managed through the EthicsPoint system will be acknowledged within 48 hours. They will then be updated with an indication of how the concern will be investigated and the likely timeline within 28 days. If it is not possible for initial enquiries to be completed within 28 days, the system will be updated to explain the reasons.

The level of contact with the disclosing worker will depend on the nature and severity of the concern reported, and the clarity of the information provided. We may need to contact the reporting worker for further information.

If the reporter is not happy with the way a concern has been handled, they can raise it with the Chairman or CEO, via the Head of Internal Audit.

## Anonymous disclosures

It is important to distinguish between an anonymous disclosure (where the identity of the person making the disclosure is withheld by them) and a confidential disclosure (where the identity of the person making the disclosure is protected by the recipient).

Where possible anonymous disclosures will be dealt with in accordance with this policy and the procedures set out in this policy; however, Wincanton's ability to investigate the issues disclosed may be restricted where the person making the disclosure withholds their identity. Certain aspects of the procedures set out below, for example, keeping the discloser informed and protecting them from penalization, may be difficult or impossible to apply unless the person making the disclosure reveals their identity.

## What is not covered by this Policy?

Speaking Up is the disclosing of information about actual or reasonably suspected wrongdoing.

This policy does not cover complaints about workers' own personal circumstances, such as the way the worker has been treated at work. In such cases workers should use the relevant People policy such as Grievance Policy, Resolution Policy or the Dignity at Work (Bullying & Harassment) Policy. This Policy is not designed to replace the Grievance Policy or any People policies, related procedures or associated documents. It is not a forum for making unfounded allegations.

## Personal grievances

Personal grievances are not generally regarded as protected disclosures and so are not

generally covered by whistleblowing law. Workers raising concerns in bad faith (for example for personal gain or revenge), or without following the procedure outlined in this Policy, may not have the protection of the law.

## Reporting other concerns

Workers may have concerns that do not fall into the protected disclosure categories described above. If they are unsure whether or not to report something, they should always [follow the procedure set out in this Policy](#) and make a report or seek guidance from the Whistleblowing Officer.

## Reporting to third parties

In most cases workers should not find it necessary to alert anyone externally; however, the law does recognise that in some circumstances it may be appropriate for them to report their concerns to an external body.



## External Confidential Helpline & Portal

Wincanton has partnered with a company called Navex to provide a confidential reporting system and independent helpline - EthicsPoint - for all workers to raise concerns, including anonymously, in respect of this Policy. It's free, secure and available 24/7:

UK:

Tel: 0800 086 8226 Portal: [www.wincanton.ethicspoint.com](http://www.wincanton.ethicspoint.com)

Republic of Ireland:

Tel: 1800 851 665 Portal: [www.wincanton.ethicspoint.com](http://www.wincanton.ethicspoint.com)

## Further advice

If you are not sure how to proceed or wish to discuss any aspect of this Policy, you should contact the Company Secretary on 01249 710000, by email

[Company.secretary@wincanton.co.uk](mailto:Company.secretary@wincanton.co.uk) or at the following address:

Wincanton  
Methuen Park  
Chippenham  
SN14 0WT

## Reviews and updates

This Policy and any associated Policy will be reviewed on a regular basis, at least annually, and will be updated and re-issued as required.

## Associated policies and further information

- The Code of Conduct
- Anti-Bribery & Corruption Policy, incorporating Gifts and Hospitality
- Grievance Policy, procedure and associated documents
- Dignity at Work (Bullying & Harassment) Policy
- Public Interest Disclosure Act 1998:  
[www.legislation.gov.uk/ukpga/1998/23/section/1](http://www.legislation.gov.uk/ukpga/1998/23/section/1)
- Whistleblowing for employees: [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing)
- Employment Rights Act 1996:  
<https://www.legislation.gov.uk/ukpga/1996/18/contents>

## Appendix 1: Procedure for reporting a concern

Workers must raise any concerns through the procedure detailed within this Policy.

If a worker is unsure whether to report a concern, they should do so as soon as they become aware.

Every report will be treated seriously and will be fully investigated. It is the responsibility of the person receiving a report of a concern to forward this to the Whistleblowing Officer, either directly or via the EthicsPoint portal.

The Whistleblowing Officer will then be responsible for allocating appropriate resources at the appropriate level for a full investigation to take place.

### Making a Protected Disclosure

- In the first instance a worker should report their concern to their Line Manager if it is appropriate to do so and they feel comfortable.
- If a worker feels it would be more appropriate, they should make a report to their People Manager in the first instance. In either case, the Line Manager or People Manager will make a report by submitting a case via the EthicsPoint helpline at [www.wincanton.ethicspoint.com](http://www.wincanton.ethicspoint.com) which will automatically submit a case report to the Whistleblowing Officer.
- The worker can contact the external, independent helpline EthicsPoint on 0800 086 8226 (UK) or 1800 851 665 (Republic of Ireland) or via [www.wincanton.ethicspoint.com](http://www.wincanton.ethicspoint.com) directly and anonymously. This can be from the outset or after speaking to their Line Manager or People Manager.
- Where workers do not feel it is appropriate to report the concern to either their Line Manager or the People team, they can contact the Whistleblowing Officer directly using these contact details:  
  
Company Secretary Tel 01249 710000, or [Company.secretary@wincanton.co.uk](mailto:Company.secretary@wincanton.co.uk)
- EthicsPoint is a system-based solution (provided by Navex) which ensures that all reports are notified to the Whistleblowing Officer as soon as possible.
- All reports case managed through the EthicsPoint system will be acknowledged within 48 hours and updated with an indication of how the concern will be investigated and the likely timeline within 28 days. If it is not possible for initial enquiries to be completed within 28 days, the system will be updated to explain the reasons.
- The investigator will aim for a final closure in a maximum of three months.
- Concerns will be assessed by the Whistleblowing Officer. Those that are not protected disclosures may be referred to the appropriate area of the business (People; Internal Audit; Finance for example) for investigation under the relevant policies and procedures.
- Where the report has been made via EthicsPoint whether anonymously or not, the

disclosing worker can gain access to the system at any time for an update on how the case is progressing.

- The Whistleblowing Officer has access to all reports to ensure they are addressed, investigated and concluded appropriately.

## Reporting other concerns

- In the first instance a worker should report their concern to their Line Manager if it is appropriate to do so and they feel comfortable.
- If a worker feels it would be more appropriate, they should make a report to their People Manager in the first instance.
- In either case, the Line Manager or People Manager will assess whether the concern is a protected disclosure by referring to this Policy and the Whistleblowing Officer as required.
  - If the concern is a protected disclosure they will make a report by submitting a case via the EthicsPoint helpline at [www.wincanton.ethicspoint.com](http://www.wincanton.ethicspoint.com) which will automatically submit a case report to the Whistleblowing Officer.
  - If it is not a protected disclosure, it will be referred to the appropriate area of the business to investigate under the relevant policies and procedures.
- Where workers do not feel it is appropriate to report a concern to either their Line Manager or HR, they can contact the Whistleblowing Officer directly, or contact the independent helpline using these contact details:

Company Secretary Tel 01249 710000, or [Company.secretary@wincanton.co.uk](mailto:Company.secretary@wincanton.co.uk)

EthicsPoint 0800 086 8226 (UK) or 1800 851 665 (Republic of Ireland) or via [www.wincanton.ethicspoint.com](http://www.wincanton.ethicspoint.com)

## Investigation of protected disclosures

Protected disclosures made by workers will be taken seriously and dealt with confidentially and sensitively, through a prompt and detailed investigation.

All genuine protected disclosures will be investigated by the Whistleblowing Officer and/or the Head of Internal Audit, or such other responsible person as they may identify.

The format of an investigation will depend on the subject matter but will usually involve interviews with relevant people and witnesses (including the disclosing worker), as well as consideration of any documentary or other evidence (such as CCTV).

If the concern is covered by another Policy, and it is appropriate to do so, it will be referred for investigation to the appropriate Central Support Function to investigate.

Some concerns may be capable of resolution by agreed action without the need for more detailed investigation, or they may have already been investigated or dealt with under an alternative process or notification.

If the decision is taken to not investigate further, we will give an explanation to the disclosing worker.

Investigations will usually be undertaken by a member of Senior Management in Wincanton (duly appointed by the Whistleblowing Officer) who is independent of the worker and of their business area, and who has no direct or indirect interest in the area of concern. Senior Managers or external advisers with specialist knowledge of the area of concern may be brought in, if appropriate.

If appropriate and the worker is known, the independent investigator will arrange a meeting with the worker as soon as possible, to discuss the concern. Workers may bring a colleague or union representative to any meetings under this Policy, but any companion must respect the confidentiality of the disclosure and any subsequent investigation.

In circumstances which may involve civil or criminal offences, the concern will be notified to the Police or appropriate Regulator and investigated with full cooperation from Wincanton. The Company Secretary as the Whistleblowing Officer will be the Company representative and Wincanton contact for the Police investigation or that carried out by the appropriate Regulator.

## Outcome of protected disclosure investigation

- The worker will be advised of the outcome of the investigation as soon as practicable. The level of detail provided will be subject to the constraints of the Company's duty of confidentiality or any other legal constraint.
- Any feedback is provided in confidence and should not be disclosed by the reporting person other than:
  - as part of the process of seeking legal advice in relation to their report from a solicitor or a barrister or a trade union official; or
  - if required in order to make a further report.
- Reports and recommendations will initially be received and reviewed by the Company Secretary in their capacity as Whistleblowing Officer.
- Dependent on the findings, recommendations for actions will be made to the relevant Senior Management and managed through to resolution by the Executive Management Team under supervision of the Wincanton Board of Directors.
- In certain circumstances, such as criminal activity, the matter will be notified to the relevant external bodies with the remit and authority to deal with the matter and take the appropriate actions. Wincanton will fully cooperate with all external bodies to the extent required.
- Regardless of the outcome of any investigation, all concerns reported under the Speaking Up Policy will be reported to the Wincanton Board of Directors, through the Audit Committee.

## Appendix 2: Policy responsibilities

### **Managers/ Directors must:**

Read, understand and follow the principles in this Policy and any associated documents;

Keep up to date with changes to this Policy and any associated documents;

Treat any reports made to them seriously, confidentially and report them immediately to the Company Secretary in their capacity as Whistleblowing Officer;

Investigate reports thoroughly when requested or authorised to do so;

Respect a worker's right to anonymity if requested;

Ensure there are no unnecessary delays concluding an investigation; and

Ensure the disclosing worker is not subject to any form of harassment, discrimination or any other detrimental effect as a result of making a report.

### **Workers must:**

Read, understand and follow the principles of this Policy and any associated documents;

Seek clarification on any points which are unclear;

Make any legitimate report which they believe falls under this Policy; and

Act in good faith when making a report.

### **People teams must:**

Read, understand and follow the principles of this Policy and any associated documents;

Support all workers when using this Policy;

Monitor the application of this Policy to ensure fairness and consistent treatment; and

Advise the Company Secretary if they believe updates are required to the Policy.

### **Whistleblowing Officer Must:**

Read, understand and follow the principles of this Policy and any associated documents;

Investigate all reports in accordance with this Policy and the Procedure within; and

Maintain a Whistleblowing Register and advise the Wincanton Board of Directors of all reports made under this Policy.

## Appendix 3: Controls

Document Control	
FUNCTION OWNER	Governance, Risk & Compliance
POLICY OWNER	Company Secretary
POLICY APPROVAL ROUTE	EMT > Audit Committee > Board
PUBLISHED DATE	February 2024
PUBLISHED VERSION NUMBER	4
EFFECTIVE DATE	February 2024
NEXT SCHEDULED REVIEW DATE	February 2025

VERSION HISTORY		
Version Number	Key changes	Effective date
1	Original version	December 2020
2	Inclusion of 'One Page Policy'; inclusion of Rol phone number in contact details; updated policy titles in 'Associated Policies'	February 2022
3	Replace 'Employee' with 'worker' to mirror the language of the Public Interest Disclosure Act (the Act). Set out the definition of Protected Disclosures per the Act. Emphasise the public interest aspect and clarify the protections under the Act. Distinguish procedure for protected disclosures and other concerns that do not meet the Protected Disclosure/public interest criteria. Move acknowledgement and update timescales into body of policy rather than procedure	February 2023



4	Addition of <ul style="list-style-type: none"><li>• Definition of detriment</li><li>• Additional wording around confidentiality (re identity and feedback)</li><li>• Additional wording around anonymous disclosures</li><li>• Addition of maximum length of time for final closure of three months.</li></ul>	February 2024
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