

## Statement on compliance with The Modern Slavery Act 2020

Wincanton is committed to the highest possible ethical standards and corporate conduct and we expect our suppliers to adhere to these same standards. The Group requires companies across our extended supply chain to understand and meet our expectations on anti-bribery, corruption, legal compliance and ethical conduct.

To this end, the following statement is offered in compliance with the Modern Slavery Act 2015 and sets out the Group's approach to the prohibition of any form of forced labour or slavery within our supply chain.

### Our values

Wincanton operates with strong corporate values: Excellence; Integrity; Passion; Proactivity; Togetherness, and Trust.

Our values are underpinned by a set of corporate policies supporting our commitment to high ethical standards and doing business with integrity, including:

- A Modern Slavery & Human Trafficking policy reinforcing our commitment to ensuring there are no instances of forced labour, slavery or human trafficking in our business or supply chain and helping our people to identify these practices;
- The Wincanton Supplier Code: we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of our supplier code will lead to the termination of the business
- A Whistleblowing Policy: we encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation; and
- The Wincanton Way, our code of conduct, explaining our ethical standards as an organisation and how we expect our employees and suppliers to act was re-launched during the year

Our adherence to these policies is subject to regular reviews, helping us to continuously improve in this area.

In addition, our Code of Conduct sets out the following:

- We expect our suppliers and partners' employees and their supply chains to operate to the highest standards of safety, quality, inclusion, integrity, sustainability and ethical conduct
- When seeking new suppliers and partners we select those whose values and commitment to ethical business conduct and a sustainable future match our own and use objective processes and due diligence to ensure this
- We are opposed to the use of any form of child labour or practices which inhibit the development of children and are opposed to any employment that is not freely chosen. We commit to refrain from using any form of labour that could be described as 'modern slavery' and expect the same from all those we work

The induction process that all employees, including drivers and warehouse operatives attend, is used to make employees aware of the content of these policies.

### **Our workforce and our supply chain**

The majority of our Group employees are UK-based managerial or office based staff, drivers and warehouse operatives, all of whom are paid at least the National Living Wage, and we believe there is a low risk of human slavery or forced labour in our direct workforce.

The risk may be more significant in our supply chain and we have therefore focused on enhancing our approach in relation to our supply chain as noted below.

### **Progress we have made**

We have continued to review and improve the way we seek to ensure there is no forced labour or human trafficking in our workforce or our supply chain.

Since we published our Modern Slavery Act Statement last year, we have:

- Reviewed our standard contractual terms that require our suppliers to commit to contributing to the prevention of modern slavery and human trafficking and to adhere to our Supplier Code;
- We have continued our programme of reviews to assess compliance by third party agencies with their commitments to preventing modern slavery and human trafficking and with other legislative requirements including relevant health and safety legislation; and
- Enhanced our pre-contract checks to assess the anti-slavery policies and procedures that new suppliers have in
- We will continue to review our policies and practices in line with our commitment to safeguarding against modern slavery and human trafficking in our business and our supply chain.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Directors on 16 June 2020.

**Lyn Colloff**  
Company Secretary

Wincanton plc  
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