

A close-up, low-angle photograph of several parallel steel rebar rods. The rods are dark grey with a prominent, repeating circular ribbed texture. The lighting is dramatic, coming from the side, which creates bright highlights on the ridges and deep shadows in the grooves, emphasizing the industrial and metallic nature of the material. The perspective is from a low angle, looking down the length of the rods, which recede into the background.

***Wincanton***

## **Modern Slavery Policy**

**Version: 4 - External**

**Published: October 2024**

**Owner: Head of Corporate  
Compliance**

# Contents

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## Policy Statement

Wincanton is committed to the highest standards of ethical business behaviour and treatment of the people that work for us and with us. Wincanton has a zero-tolerance approach to modern slavery and we seek integrity and transparency in all our business dealings and relationships.

Modern slavery is determined by the Modern Slavery Act 2015 and is both a crime and a violation of fundamental human rights. It can be evident in various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All of these are forms of exploitation of people for personal or commercial gain and involve the deprivation of liberty for those purposes.

Wincanton implements and enforces effective systems and controls to ensure modern slavery is not taking place anywhere in our own business nor in any of our supply chains by partnering with a specialist social audit provider, and through internal audit reviews. Wincanton has a detailed statement setting out our commitment and actions in relation to modern slavery which is available online at [www.wincanton.co.uk/slavery-act/](http://www.wincanton.co.uk/slavery-act/)

Wincanton has registered with Stronger Together, a not for profit organisation that partners with business on collaborative programmes.

Working across multiple sectors to achieve a wider vision of a world where all workers are recruited responsibly and have fair work, free from exploitation.

We therefore expect the same high standards from all of our contractors, suppliers and other business partners: as part of our contracting processes, our Code of Supplier Responsibility includes a commitment and specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. Wincanton may cease working with any supplier found to be in breach of the Code of Supplier Responsibility.

## Objective

The Policy objectives are to:

- raise awareness of modern slavery and human trafficking to help those it applies to recognise any circumstances or situations for concern in the workplace;
- encourage an open and protected environment for concerns to be raised, investigated and properly addressed, without fear of reprisal, criticism or discrimination; and
- give assurance of Wincanton's commitment and support for sharing genuine concerns at an early stage, confidentially, and without fear of victimisation.

By promoting and supporting this Policy, Wincanton sets out its expectations for people working for us and all of our contractors, suppliers and other business partners.

## Policy Summary

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Modern slavery is a crime.

Modern slavery includes:

- Slavery;
- Servitude;
- Forced labour;
- Compulsory labour; and
- Human trafficking.

If you have legitimate concerns or suspicions of any aspect of modern slavery in our business or our supply chains, you must report them.

Report your legitimate concerns via the EthicsPoint hotline, web portal or to any manager in Wincanton.

Tel: 0800 086 8226 from the UK / 1 800 851 665 from Republic of Ireland

Website: [www.wincanton.ethicspoint.com](http://www.wincanton.ethicspoint.com)

We have KPIs in place to measure our progress.

Wincanton is committed to ensuring that no one who makes a report in good faith suffers any detrimental treatment as a result of that report.

Breach of this Policy can result in disciplinary action and/or dismissal, or termination of contract.

## What is Modern Slavery and Human Trafficking?

Modern slavery includes slavery, servitude, forced and compulsory labour, bonded and child labour. Victims are coerced, deceived and forced against their free will into providing work or services.

Human Trafficking is where a person arranges or facilitates travel of another person with a view to that person being exploited.

Some examples are provided below to give you some context:

- Individuals are forced to work through mental or physical threat
- Individuals are dehumanised, treated as a commodity or bought/sold as property
- Individuals are physically constrained or have constraints or restrictions placed on their freedom

## Your Responsibility to raise concerns

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all of us, all those working for us and anyone under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Anyone covered by this Policy must notify their line manager, People manager or the Company Secretary of any legitimate concerns or suspicions of modern slavery or human trafficking in any part of our business or supply chain. Concerns can also be raised using the Ethicspoint portal at [Wincanton.ethicspoint.com](http://Wincanton.ethicspoint.com) or by phone on 0800 086 8226 from the UK and 1 800 851 665 from Republic of Ireland.

You must report your concerns at the earliest possible stage if you believe or suspect a situation or event has occurred or is likely to occur at any level of our business, that would not comply with this Policy, and the Policy Statement.

You can report your concerns anonymously through our Speaking Up portal via EthicsPoint.

## Breach of the Policy

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy or fail to meet the high levels of commitment we require in relation to modern slavery.

## Further Advice

If you are not sure how to proceed or wish to discuss this Policy or making a report, you should contact the Whistleblowing Officer via [company.secretary@wincanton.co.uk](mailto:company.secretary@wincanton.co.uk), on 01249 710000, via EthicsPoint 0800 086 8226 from the UK / 1 800 851 665 from Republic of Ireland or [www.wincanton.ethicspoint](http://www.wincanton.ethicspoint) or at Wincanton Ltd, Methuen Park, Chippenham, Wiltshire, SN14 0WT.

## Policy Responsibilities

This Policy supersedes previous policies and practices and local site arrangements. It is not designed to replace the Grievance Policy or associated People procedures. It does not form part of an employee's contract of employment and will be amended from time to time. If there is any discrepancy with this Policy and legislation, the legislation will prevail.

The Board of Directors of Wincanton Ltd have overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Executive Management Team have the primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring internal control systems and procedures are in place to effectively counter modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Specifically:

### **Managers and Directors Must:**

- Read, understand and follow the principles in this Policy and any associated documents.
- Ensure those reporting to them are aware of, have read and understood this policy and complete the mandatory training provided.
- Communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced, as appropriate, thereafter.
- Keep up to date with changes to this Policy and any associated documents, including in particular terms that are required in our third-party contracts.
- Treat any reports made to them seriously, confidentially and report them immediately to the Company Secretary in their capacity of Whistleblowing Officer.
- Investigate reports thoroughly when requested or authorised to do so.
- Respect the reporter's right to anonymity if requested.
- Ensure there are no unnecessary delays concluding an investigation.
- Ensure the disclosing employee is not subject to any form of harassment, discrimination or any other detrimental effect as a result of making a report.

### **Employees Must:**

- Read, understand and follow the principles of this Policy and any associated documents.
- Complete the mandatory training provided.
- Seek clarification on any points which are unclear.
- Make any legitimate report which they believe falls under this Policy.
- Act in good faith when making a report.

### **People Team Must:**

- Read, understand and follow the principles of this Policy and any associated documents.
- Support all Employees when using this Policy.
- Ensure all necessary checks are carried out at recruitment, and on a regular basis going forward, to ensure colleagues are being paid in to their own, individual bank account.
- Monitor the application of this Policy to ensure fairness and consistent treatment.
- Advise the Head of Corporate Compliance 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.
- Maintain a Whistleblowing Register and advise the Wincanton Ltd Board of Directors of all reports made under this Policy.

## **Key Performance Indicators (KPIs)**

We have developed a number of KPIs to measure our progress in tackling modern slavery and human trafficking. These are listed below:

### **Supplier engagement:**

- Percentage of suppliers to have completed modern slavery checks via the Achilles onboarding process.

### **Modern Slavery Training:**

- Number of new and relevant colleagues, and contractors, identified via MyLearning, to complete mandatory Modern Slavery training.
- Percentage of managers and IT users to complete annual Modern Slavery training.

### **Due Diligence:**

- Number of matching addresses (multiple occupancy) and bank details (gangmaster risk) identified within HR and payroll systems.

### **Business Policy:**

- Number of Wincanton sites which have access to educational materials from Stronger Together.

## 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

- Code of Supplier Responsibility
- Speaking Up Policy
- Resolution and Grievance Policy and Improving Behaviour at Work Policies, Procedures and associated documents
- Anti-bribery & Corruption Policy
- Employee Relations Policy
- Diversity, Inclusion & Belonging Policy
- Recruitment Policy
- Termination Policy
- Working Hours & Timekeeping Policy

Document Control	
FUNCTION OWNER	Governance, Risk and Compliance Team
POLICY OWNER	Head of Corporate Compliance
POLICY APPROVAL ROUTE	EMT
PUBLISHED DATE	October 2024
PUBLISHED VERSION NUMBER	V4
EFFECTIVE DATE	October 2024
NEXT SCHEDULED REVIEW DATE	October 2025

# stronger together

tackling hidden labour exploitation



Are you being forced to work when you don't want to?



Do you have to pay someone money to give you work?



Are you being forced to live in accommodation against your will?



Is someone controlling your identity documents or bank account?



Is someone threatening or intimidating you or your family?

## YES? GET HELP!

For advice, support and to report contact:

A trusted manager or worker representative



Modern Slavery Helpline: 08000 121 700 (confidential, 24/7)  
[www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)



Gangmasters and Labour Abuse Authority: 0800 432 0804 (confidential, office hours)  
[intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk)



Police: 101 (non-urgent) 999 (emergency)

[www.stronger2gether.org](http://www.stronger2gether.org)

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