

A close-up photograph of several parallel steel reinforcement bars (rebar) with a ribbed texture. The bars are arranged in a grid pattern, and the lighting creates strong highlights and shadows, emphasizing their cylindrical shape and the depth of the ribs. The word "Wincanton" is overlaid in white, italicized font in the upper right quadrant.

Wincanton

Supplier Code

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Foreword

I am pleased to endorse our Supplier Code. As a Group, we want to ensure that all our suppliers operate in a responsible and sustainable manner and we want our suppliers to share in our purpose of “Great people delivering sustainable supply chain value”.

This Code sets out the key social, ethical and environmental values that we expect you to abide by.

The themes highlight the issues that are important to us; from ensuring we support an inclusive and ethical supply chain through to ensuring individuals throughout our supply base work in a manner which is both safe, healthy and environmentally aware.

We would like you to share this Code with your employees that work on Wincanton activity so they can understand our values and aspirations and contribute to our mutual success.

We are always keen to hear about how we can work better together, including ideas on areas relating to responsible business and sustainability. At the same time, if there is anything that could be improved, then we want to know so we can change it.

We are on a journey to continually improve our responsible business and sustainability approach. We believe we can make a real difference together and work towards realising our purpose of “Great people delivering sustainable supply chain value”. I invite you to join us on this journey.



James Wroath
Chief Executive Officer
July 2021

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1. Introduction

Our Approach to Responsible Business and Environmental Sustainability

Wincanton aims to be the leading supply chain partner for UK businesses, and our purpose is to “*Great people delivering sustainable supply chain value*”. To meet our objectives and purpose, it is crucial that we act in a responsible, sustainable and inclusive manner, and this includes the way in which we source goods and services from our suppliers.

Wincanton aims to be a leader in supporting the UK’s transition to a more sustainable, low carbon economy. We recognise the importance of understanding and mitigating climate risks and the moral and commercial imperative for organisations to reduce their environmental impact.

You can read more about our Group and our ESG Strategy by visiting our website, www.wincanton.co.uk.

This Supplier Code is for all suppliers. It defines what we expect from you in terms of responsible business, sustainability practice and behaviour.

What You Need to Do

You are expected to:

- Comply with this Code (and any future revisions)
- Explain the principles of this Code to your employees and key sub-contractors that support the Group or work on our projects
- Ensure fair and honest business with all your stakeholders, including employees, sub-contractors and other third parties
- Inform us if anything changes and you are unable to comply with this Code

You are encouraged to:

- Speak up if you are concerned about any actions or decisions that contravene the standards set out in this Code
- Let us know if you would like to collaborate on any specific areas relating to Responsible Business or Sustainability

2. What We Expect of You

Our expectations of our suppliers in terms of responsible business, sustainability practice and behaviour are grouped into six key areas -

- **Human Rights**
- **Health & Safety**
- **Supply Chain**
- **Diversity & Inclusion**
- **Doing Business Responsibly**
- **Environmental Sustainability**

In each case, we describe our minimum expectations using the term “**we expect**”. In some areas, we aspire to meet certain standards, and, in this case, we use the term “**we encourage**”. We have a suite of Third-Party Policies, some of which you may be asked to comply with depending on the services you provide to us. You can review all of our Third-Party Policies at www.wincanton.co.uk/contact-us/supplier-enquiries/.

Human Rights

We expect all our suppliers to respect human rights, both of your own workforce but also those in your supply chain.

We expect you to:

- Respect the human rights of your employees and to comply with all relevant legislation, regulations and directives, including the Modern Slavery Act and its reporting obligations, in the countries and communities in which you operate
- Have a written Modern Slavery Policy where required by the Act
- Prohibit forced labour (slavery) and human trafficking in your supply chain and give all employees the right and ability to leave employment if they choose
- Prohibit child labour
- Ensure that wages meet legally mandated minima without unauthorised deductions
- Allow your employees to legally organise and join associations (such as labour unions)
- Provide clear and uniformly applied disciplinary and grievance procedures including prohibiting mental, physical or verbal abuse
- Ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is at a manageable level

We encourage you to:

- Have a written Modern Slavery Policy even where you do not meet the statutory minimum turnover requirement
- Provide your employees with awareness training of modern slavery and trafficking issues

Health & Safety

We expect all our suppliers and their employees to operate in a manner which is safe.

We expect you to:

- Provide a safe work environment abiding by local laws and regulations, respecting the health and wellbeing of your employees and any subcontractors
- Have a written Health and Safety Policy

Supply Chain

We expect all our suppliers to manage their own suppliers in a responsible and sustainable manner.

We expect you to:

- Manage your own suppliers appropriately to mitigate supply chain risks
- Have reasonable payment policies covering your own suppliers
- Consider the ethical and sustainable practices of your supply chain and proactively work with suppliers to mitigate such risks

Diversity & Inclusion

We expect all our suppliers to understand our vision in relation to diversity and inclusion.

We expect you to:

- Treat all employees fairly and not discriminate against any group in your employment practices, in particular on the basis of gender, race, age, sexual orientation, gender identity, disability, faith, or family circumstances
- Proactively support the development of a diverse and inclusive workforce including fair representation of women, disabled people, LGBT+ and BAME employees

We encourage you to:

- Have a documented Diversity & Inclusion statement or set of statements within your Policy framework
- Encourage positive mental health at work and have a documented mental health and wellbeing strategy

Doing Business Responsibly

We expect all suppliers to act with honesty and integrity, managing their business ethically and responsibly.

We expect you to have identified and understand the risks in your business and to:

- Have a written Responsible Business strategy which sets out your approach, governance and the steps you take to ensure you are doing business responsibly
- Adopt your own Supplier Code, or a similar policy or statement that covers:
 - Adherence to local laws
 - Bribery and corruption
 - Business integrity (including improper payments, conflicts of interest, fraud, competition, gifts and hospitality, and brand and intellectual property protection).

Environmental Sustainability

All businesses have a responsibility to be proactively managing and reducing their environmental impact.

We expect you to understand these impacts and to:

- Abide by all legislation and regulations related to environmental protection
- Have a written Environmental Policy and/or Sustainability Policy which is appropriate and relevant for your operations
- Have a sustainability strategy which sets out how your organisation is working to reduce your environmental impacts and support the transition to a low-carbon economy
- Collaborate with us to help reduce our environmental impacts (which include carbon reduction, energy consumption, travel, water consumption and economy practices that reduce resource use and operational waste)

3. What We Will Do

Our Commitment to You

We commit to:

- Work closely with you to share expertise in developing innovative, high quality products and services and in effectively managing risk
- Engage with you and others in your markets in ways that ensure we achieve the best value for customers in terms of price, quality and social impact
- Build strong, collaborative relationships with our strategic suppliers and helping them to understand the environment in which we operate so that they can meet our needs and our customers' needs
- Review this Code regularly and revise it over time as our approach to responsible sourcing evolves.

Compliance with the Code

We expect all our suppliers to meet or exceed all the provisions of this Code. Our goal is to work with you on developing our approach to responsible sourcing and sustainable procurement.

We reserve the right to review your policies, procedures or any other documentation related to this Code. In some higher risk instances, we may undertake an on-site audit to validate your adherence to this Code and applicable Third-Party Policies.

In situations where you are not yet compliant with the expectations set out in this Code, you must let us know. We will work with you on the development of an improvement plan.

However, if the issue is serious enough or cannot be resolved in a reasonable time frame, we may undertake a review of the terms of the contract.

This may include order reduction or, ultimately, in accordance with any applicable contractual right, termination.

The provisions in this Code are in addition to and not in lieu of any legal agreement or contract.