

The background of the slide is a photograph of two men walking through a warehouse aisle. They are both wearing bright yellow high-visibility safety vests over their work clothes. The man on the left is looking down at something in his hands, while the man on the right is looking at him and holding a tablet. They are walking between tall blue metal shelving units filled with stacked boxes and pallets. The lighting is bright, typical of a warehouse environment.

Our Code of Conduct

Date: April 2025
Version: F.2

Wincanton

Our Code of Conduct

Great people
delivering
sustainable
supply chain
value

Wincanton is at the heart of British supply chains, providing supply chain solutions up and down the nation with colleagues working across 17.4m sq ft of warehousing space. We put our customers at the heart of everything we do. We want to be the best performing and most trusted supply chain partner that they have.

Our Code of Conduct sets out what we stand for as a company. It is underpinned by a corporate governance structure and a robust risk, controls, and compliance programme. Adhering to the Code helps our colleagues to make the right choices and demonstrate the highest standards of integrity and ethical behaviour, in everything that we do.

Our comprehensive framework of policies and standards is applied across Wincanton regardless of where we work or what level we are. It is important that we each take the time to understand and adopt the Code of Conduct and the associated behaviours: believe it, live by it, and promote it to others.

It will help us to have the confidence to contribute fully; to make the right decisions in difficult situations; and to safely speak up and raise concerns when we suspect poor or unethical decisions may be being made by others.

Our Code is reflective of our new behaviours: We're thoughtful; We're prepared; We're aiming high.

To maintain and grow our reputation, we have a responsibility both as a group and as individuals to act positively to achieve our company and personal goals and to always maintain the highest standards of behaviour and achievement.

People want to be recognised for doing an amazing job both collectively and individually and we all want to help make Wincanton a company of which we are proud. The Code helps us do just that. Our Code will help us deliver a sustainable and successful future for our business and together we will be the most innovative, effective and respected logistics company.



Tom Hinton
Interim Chief
Executive Officer

Our values

At Wincanton, the way we approach our work is rooted in our values. Whether we're engaging with our colleagues, our customers or communities, we are thoughtful, we're prepared, and we're aiming high.

The way these values translate into the real world are demonstrated by our behaviours and influence our culture.



We're thoughtful

Being thoughtful in all areas of our work. Always considering the impact on our colleagues, our communities and the environment.

We're prepared

Thinking ahead, planning and taking ownership of our outcomes; ensuring we continue to deliver sustainable supply chain value.

We're aiming high

Being ambitious, trying new things and working together to grow and develop our colleagues and our customers' businesses.

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1.1 What is it for?

The Code of Conduct is our **commitment** to how we work and our **recipe for success** in becoming the UK's most **innovative, effective and respected** logistics company.

Combining **expectations, principles and aspirations**, the Code of Conduct clearly sets out how we work and how our values support us in connecting and delivering with our colleagues, customers, communities and suppliers.

The Code of Conduct acts as a **compass**, making sure we're always heading the right direction, remaining **performance-focused and productive**, whilst doing the right thing and being legally compliant in everything we do.

We are clear that we expect our colleagues, partners and suppliers to **follow the Code of Conduct** at all times, making us a company that people **aspire** to work for and with.



1.2 Who does it apply to?

The Code of Conduct applies to everyone who works for or represents Wincanton:

- Our directors, officers and colleagues
- Those we choose to work with and those who aspire to work with us.

Wincanton colleagues managing third parties such as suppliers, consultants, contractors and sub-contractors should expect them to adhere to the Code of Conduct. Providing the appropriate information and training to enable them to do so.

Appropriate action should be taken if a third party is shown not to have complied with the Code of Conduct. This may include termination of contact or project withdrawal.

Wincanton



1.3 What we expect from our colleagues?

Be familiar with the Code of Conduct and the associated details policies relevant to your responsibilities and adhere to them.

Keep up to date with changes in your industry sector or in the regulatory landscape that might affect Wincanton's legal compliance, ethical position or market reputation.

Raise any concerns you may have about our current or proposed activities as promptly as you can in the appropriate way.

Participate fully in any investigation of potential non-compliance.

Upholding the Code of Conduct is a explicit expectation of all our colleagues and leaders. Those who do not do so may face investigation and disciplinary action up and including termination of employment.

Be aware, be accountable, be responsible

Although we try to focus on the positive actions the Code of Conduct fosters, there will occasionally be times when negative behaviours must be addressed. We will have zero tolerance of:

- Condoning unsafe working practices
- Breaking the law or encouraging others to do so
- Discrimination on any grounds
- Bullying and harassment
- Violence and aggression
- Bribery and corruption
- Fraudulent activity
- Retaliation against those who speak up and do the right thing
- Misuse of Wincanton data and IT systems.

Wincanton



1.4 What we expect from our leaders?

Our leaders are responsible for the performance and productivity of their organisation and the delivery of their business objectives.

Our leaders are held accountable for creating an environment which allows our colleagues to flourish, which monitors how well the Code of Conduct is being followed, and which deals appropriately with any instances of potential non-compliance.

Leaders should ensure that colleagues and partners feel accountable for our legal and ethical performance and for working in a way that demonstrates our values. Business results should never be put ahead of policy compliance and ethical conduct.

Leaders must promote a culture of accountability, holding themselves and others to high standards of performance and behaviour, leading by example.

If you lead a team or manage partners, you must ensure they're all familiar with the Code of Conduct and provide them with the support and advice required to apply it and uphold its intent.

Colleagues should be supported to safety and constructively question how things are being done and raise any concerns about whether the Code of Conduct is being followed.

Leaders should measure and monitor compliance with the Code of Conduct and establish control measures as necessary.

Any concerns raised should be documented and acted on promptly and appropriately with corrective and disciplinary action taken as necessary.

Colleagues and partners should be recognised for acting with integrity and adherence to the Code of Conduct.

Our leaders set the example, act with integrity and provide support



1.5 Speaking up

At Wincanton, we're committed to conducting our business with our stakeholders (employees, customers, suppliers, the communities and environment in which we operate) in a lawful and ethical manner.

Speaking Up, also known as whistleblowing, is the disclosure of information about actual or reasonably suspected wrongdoing, danger of breaches of policy or regulations in relation to any aspect of Wincanton's business.

The Speaking Up Policy sets out how to raise concerns about activities that you know or believe to be dishonest, dangerous or unethical. It is not designed to replace the Resolution and Grievance Policy or any People policies, related procedures or associated documents.

Speaking Up is the right thing to do. We want to know about your concerns so we can do something about them and make Wincanton a better place to work and thrive.

Speaking Up is the right thing to do

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

NAVEX
GLOBAL

Wincanton

1.6 Following the Code of Conduct

It is important that we all understand the Code of Conduct and consciously use it every day, particularly if we are faced with difficult situations.

If you ever find yourself in a situation which 'doesn't feel right' or where it is hard to know what to do, refer to the Code of Conduct and ask yourself:

Will it amaze the customer and benefit their business?

- Will it make our business better?
- Is it the right and best use of our assets or information?
- Would I be happy to take credit for this decision?

How would I feel about myself afterwards? What would my family and friends think?

How would this action look if it was reported in the media?

- Will this action put myself, my colleagues, the public or the environment at increased risk of harm?
- Is it legal? Is it right? Is it fair? Does it align with our values?
- Am I or a colleague favouring one person over another without merit or evidence? Am I exhibiting conscious or unconscious bias?
- Am I calling out behaviour that is not aligned with the Code of Conduct and making my position clear in a constructive way?



2 Getting into the detail

While we believe the Wincanton Code of Conduct is a model for the exemplary business we aim to be, there are some specific areas where further detail is required to help us identify opportunities or navigate risks successfully.

The following guidance underpins the Code and provides links to some of the relevant policies or external resources that may further assist colleagues in challenging situations.

Wincanton



3.1 Health and safety (H&S)

- At every level of our business, we are committed to the health, safety and welfare of our colleagues and others
- We deliver safety first
- We have robust systems and processes to comply with statutory requirements, and the attitudes and behaviour of our colleagues drive improvement in health and safety
- We will not tolerate anyone condoning unsafe behaviour or working practices.



You must:

- Make sure that you understand the H&S requirements of your job and get help from the H&S team if you need it
- Always follow our safe systems of work and meet our H&S Policy and standards
- Stop work if you think it is unsafe to continue
- Make sure you have the right H&S training required for your job
- Using the correct recognised processes, challenge colleagues if you think that an action or decision is unsafe and might result in increased risk of harm to colleagues or others
- Immediately report H&S incidents, including near misses and unsafe acts, omissions or conditions
- Speak up if you think that actions or decisions may result in an increased risk of harm or breach of our H&S Policy or procedures.

Wincanton

Subject matter owner:

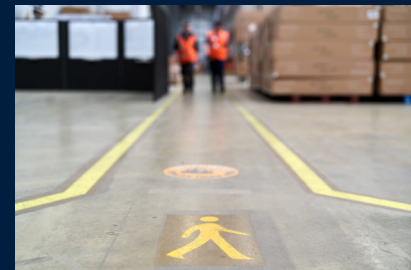
Group Health and Safety Director and H&S team

Relevant Wincanton Policies:

As described in the Health and Safety Manual

Things to watch out for:

Follow our H&S principles and adopt the STAR values, 'Stop, Think, Assess and React'.



3.2 Security

- We always want to minimise risk to our people and assets. A high level of security makes good business sense and supply chain security is a business function that must continually develop and adapt to change
- Supply chain security is the responsibility of everyone within the organisation
- The Wincanton approach to supply chain security is based on the identification and control of risk
- Supply chain security within Wincanton shall be underpinned by the effective planning, monitoring and review of the security policy, associated security plans, working practices and performance, working with industry partners and security agencies to achieve the best results
- We ensure suppliers of third-party security provision hold recognised accreditation for the services being provided
- We partner with a number of groups to gather intelligence and help reduce risk to our supply chain operations

You must:

- Ensure you have completed the required security training assigned to you in MyLearning
- Annually assess your site/contract security threats and plan risk reduction measures – risk assessment templates and submission form are located on MyPlace
- Ensure a CCTV DPIA is completed for any new or upgraded CCTV system
- Report any security concerns to your line manager in the first instance, The Supply Chain Risk and Security Manager or via the Speaking Up channels
- For any support or advice, contact group.crime.security@wincanton.co.uk.



Wincanton

Subject matter owner:

Supply Chain Risk and Security Manager

Relevant Wincanton Policies:

Surveillance Technologies Policy
Social Media and Drone Policy
Security Policy Statement

Things to watch out for:

Anything that seems suspicious or out of the ordinary.



3.3 The environment

- We are committed to the protection of our environment and the sustainable use of resources
- We have robust systems and processes to comply with statutory requirements
- The attitudes and behaviour of our colleagues which is our culture of care for the environment, underpin our environment programme
- We recognise that our business activities contribute to climate change, and we are committed to mitigating this risk at every opportunity, working collaboratively with our customers
- We will not condone behaviour or working practices that put the natural environment at increased risk of harm.



You must:

- Make sure that you understand the environmental requirements of your job and get help from the environment team if you need it
- Always work within our Environment Policy, standards, systems and local procedures
- Stop work if you think it will potentially cause avoidable, uncontrolled pollution
- Make sure you have the right environmental training required for your job
- Challenge colleagues if you think that an action or decision might result in increased harm to the environment
- Report environmental incidents, including near misses and environmentally unsustainable acts, omissions or conditions
- Speak up if you think that actions or decisions may result in harm to the environment or not meeting our environmental standards, policies, procedure or goals.

Wincanton

Subject matter owner:

Head of Sustainability

Relevant Wincanton Policies:

ESG Policy

Environment Policy

Environment hub on MyPlace

Things to watch out for:

Follow our H&S principles and adopt the STAR values, 'Stop, Think, Assess and React'.



3.4 Equality, diversity and inclusion

Our commitment, Wincanton will:

1. Represent diversity and celebrate an inclusive workplace
2. Ensure all colleagues have the opportunity to grow, develop and succeed
3. Support local and national Diversity and Inclusion initiatives
4. Not tolerate any form of discrimination.

Colleague expectation

As a Wincanton colleague, I can expect:

1. To be treated fairly and without any discrimination
2. A level playing field, in respect of career and development opportunities
3. To have access to networks that enable and celebrate diversity
4. To feel included, accepted and understood so that I can add my unique value.



Wincanton

Subject matter owner:

Chief People Officer

Relevant Wincanton Policies:

Equality, Fairness and Diversity Policies

Things to watch out for:

Have you completed our Diversity Inclusion and Belonging (DIB) training?

Diversity and Inclusion community on MyPlace.



3.5 Wellbeing

Wincanton will breakdown stereotypes and stigma, ensuring all colleagues feel valued, supported, included and safe.

We will:

- Create a minimum standard framework supporting wellbeing and mental health
- Foster a culture and environment of togetherness, kindness, openness and acceptance
- Engage with national and international wellbeing awareness events
- Wincanton will empower all of us to look after ourselves and others.

Wincanton will empower all of us to look after ourselves and others.

We will:

- Through clear and instantly recognisable branding, signpost a diverse range of topics
- Provide safe accessible spaces to talk, receive support and guidance, welcoming all colleagues, in confidence
- Leaders will engage with their teams on a regular basis with kindness, empathy, inclusion and a focus on wellbeing.

As a Wincanton colleague, I can expect:

- That challenges in our wellbeing which can present themselves in many forms are recognised by my business
- To be treated with compassion and support when we are experiencing poor mental health or other challenges in our life
- To see clearly branded signposting
- The business to provide trained mental health first aiders and offer support
- To know that looking after each other makes a difference
- If one of my colleagues wants to talk, I will listen with kindness, openness and acceptance
- That in Wincanton nobody is alone.

Looking after
ourselves and others



Wincanton

Subject matter owner:

Chief People Officer

Relevant Wincanton Policies:

Equality, Fairness and Diversity Policies

Things to watch out for:

A small conversation can make a big difference.

Mental health First Aiders

Health and Wellbeing community on MyPlace.



3.6 Performance and reward

You must:

- We aim to reward our colleagues fairly and consider individual contributions to the performance of the business
- We set and assess objectives and performance goals fairly and consistently
- We regularly review the work of our colleagues and provide constructive performance feedback
- We invest in the education, training and skills development of our colleagues to improve the capability and capacity of our business.
- Perform your job to the best of your ability, responding to feedback constructively and participating fully in the company performance management process
- As a manager, evaluate the performance of your team fairly, objectively and consistently, providing regular specific, feedback
- As a manager, actively recognise excellence and address under-performance, supporting and promoting the development of your team.



Wincanton

Subject matter owner:

Head of Reward

Relevant Wincanton Policies:

Performance Management, Development and Reward Policies

Things to watch out for:

Do your job to the best of your ability and talk to your line manager first about development opportunities.



3.7 Colleague engagement

- We expect collaboration and respect between our colleagues and encourage openness and honesty in our relationships
 - We engage, include and involve our colleagues in business improvement and value their feedback and ideas, providing safe spaces for them to give it
 - We respect the relevant processes and laws on collective representation and consultation and recognise that joining a trade union is an individual choice
 - We endeavour to share information and discuss business and employment issues with our colleagues and their representatives
 - We resolve disputes fairly.
- You must:**
- Accept accountability and responsibility for delivering the best results for our customers
 - Ask for, provide and act on constructive feedback
 - Be open with your colleagues and act with integrity
 - As a manager, engage your team, make sure they know what's expected of them; what contribution they are making to our success and how your decisions and actions affect them
 - As a manager make sure your team have the help and support they need.



Wincanton

Subject matter owner:

Chief People Officer

Relevant Wincanton Policies:

People Policies

Things to watch out for:

Always participate in our annual 'Your Pulse' survey - we can't make things better without your input.



4.1 Business reporting

- We create and maintain accurate and complete data records that reflect the Company's transactions and meet our business needs as well as legal and regulatory requirements
- We ensure any public financial or non-financial reports contain full, fair, accurate, timely and understandable disclosure as required by law
- We have designed appropriate internal and disclosure controls to ensure business reporting is complete and accurate
- We are committed to the prevention of fraud and aim to detect and investigate any apparently fraudulent activity
- We always act within the law and the applicable professional standards
- We pay the taxes, levies and tariffs applicable to our transactions and goods.

You must:

- Be responsible for maintaining the integrity of firm data and complying with all record keeping policies, controls and procedures we have in place
- Preserve documents and records in accordance with the applicable legislation or policy
- Ensure all financial and other business controls are operated and evidenced where possible to demonstrate an appropriate audit trail
- Comply with our policies in relating to all tax matters and dealings with tax authorities
- Review and maintain your personal training and development needs to be able to fulfil your professional role
- Not compromise the integrity of our business records, reports, products or services or influence others to do so
- Not make a deliberately false or misleading entry in records and reports or falsify any corporate records
- Speak up regarding any suspicion of fraud to your line manager or follow the whistleblowing process.

Wincanton

Subject matter owner:

Group Financial Controller

Relevant Wincanton Policies:

Wincanton Finance Manual

Things to watch out for:

Ensure all business reporting, both financial and non-financial, is complete and accurate.



4.2 Fraud

- Wincanton has a zero-tolerance approach to fraud and we seek integrity and transparency in all our business dealings and relationships
- Fraud is determined by the Fraud Act 2006 and can take place in many forms such as false representation, abuse of position and failure to disclose information
- The Economic Crime and Corporate Transparency Act establishes a new offence of Failure to Prevent Fraud. Under this offence, an organisation will be criminally liable where a fraud offence is committed by an employee or agent, for the organisation's benefit. The only defence to this is to have "reasonable fraud prevention procedures" in place
- Wincanton fosters honesty and integrity across the business. Wincanton provides clear routes by which concerns may be raised. Details of this can be found in the Wincanton Speaking Up Policy
- Wincanton will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently and that all decisions are taken objectively and free of personal interest. Wincanton will not condone any behaviour that falls short of these principles
- The circumstances of individual frauds will vary. Wincanton takes fraud very seriously and will ensure that all cases of actual or suspected fraud, including attempted fraud, are vigorously and promptly investigated and that appropriate remedial action is taken.

You must:

- Lead by example in adhering to policies, procedures and practices
- Ensure third parties, such as suppliers and contractors, are aware that they are expected to act with integrity and without intent to commit fraud against Wincanton or its customers or suppliers
- Ensure all financial and administrative processes are carried out and reported honestly, accurately and transparently
- Carry out prompt and effective investigations where required or requested to do so
- Report any concerns you may have regarding fraudulent activity to your line manager or the via the Speaking Up hotline.



Wincanton

Subject matter owner:

Director of Treasury, Tax and Insurance

Head of Corporate Compliance

Relevant Wincanton Policies:

Fraud Policy

Anti-Bribery and Corruption Policy

Things to watch out for:

Have you completed the Fraud, Bribery and Corruption eLearning module?



4.3 Excellence, innovation and Continuous Improvement (CI)

- We recognise that a commitment to excellence and innovation is essential to customer satisfaction and business success
- We will provide tools, processes, support and training to develop ideas and implement best practice everywhere
- We will provide guidance and support to maintain high standards in all of our sites, through the use of our 8 Principles of Operational Excellence framework
- We are committed to Continuous Improvement (CI) by inclusive collaboration for everyone across sectors, functions and regions
- We will encourage and support active participation in the sharing of ideas through the use of our CI app underpinned by great example case studies across all of our operations in a standard format for ease of use and understanding.

You must:

- Take responsibility for delivering an excellent service that meets our obligations and the expectations of our customers
- Support and encourage the culture on site to embrace change and challenge non value add activities
- Adopt and embed Wincanton best practice in everything we do
- Respond promptly by taking action to address any concerns about possible issues including, safety, quality, cost, delivery and our people
- Actively participate in identifying ways to innovate and continuously improve our operations, considering processes, people and the place in which we work.



Wincanton

Subject matter owner:

Head of Continuous Improvement

Relevant Wincanton Policies:

8 Principles of Operational Excellence

Continuous Improvement tools and training

Things to watch out for:

Ensure you put your projects on the CI app.



4.4 Protecting our assets

- Our service capability, intellectual property and commercially sensitive data and information are crucial business assets and we protect them from unauthorised disclosure and use
- We take individual responsibility for the care and proper use of our physical business and customer assets including computer systems, vehicles, facilities, Materials Handling Equipment (MHE) and other equipment
- We do not tolerate the use of our information systems or other physical assets to access, copy, store or transmit any information considered to be offensive, obscene or inappropriate.



You must:

- Only use our physical and information assets for business purposes, unless you have prior authorisation for other use
- Maintain assets carefully, guarding against damage, theft, waste and abuse
- Not seek personal gain from the use, sale or disposal of our business assets
- Value the company's time to fulfil the responsibilities of your job
- Not attempt to avoid IT security controls
- Keep all our documents and data protected, stored securely and on the correct system
- Not disclose our commercially sensitive information to third parties without authorisation
- Always seek guidance before giving information, opinions or views to third parties.
- Complete equipment and service testing documentation accurately, truthfully and objectively.

Wincanton

Subject matter owner:

IT Director or Line Manager

Relevant Wincanton Policies:

IT Acceptable Use Policy
IT Security Policy

Things to watch out for:

Trust your instincts, if an email or phone call feels odd, it probably is - report it.



4.5 Confidential information

- We will protect information in our possession that is confidential or proprietary to other parties, such as customers, suppliers and partners
- We will not attempt to obtain or use without authorisation the confidential or proprietary information of other parties
- We will ensure the compliance with all data and information policies covering virtual and hard copy data
- When working with customers such as defence companies where national security may be an issue, we will manage customer classified or proprietary information, materials and assets in accordance with the appropriate policies, processes and legislation.



You must:

- Avoid placing yourself or the company in the position of receiving other parties' confidential or proprietary information or assets when not authorised to do so
- Not acquire or duplicate documents or material unless authorised to do so
- Not seek access to classified materials from defence companies where access is not required for legitimate business purposes or if you are not authorised to do so
- Keep all documents and data entrusted to us by other parties protected and secure. Where national security may be a concern, classified information should be managed in accordance with the appropriate policies, processes and legislation
- Not disclose, either internally or externally, commercially sensitive information about a customer, competitor or partner, without their permission to do so
- Seek advice if you are unsure.

Wincanton

Subject matter owner:

IT Director

Relevant Wincanton Policies:

IT Acceptable Use Policy
Document, Data Retention and Destruction Policy

Things to watch out for:

If you think a piece of data could harm the company or an individual if it was disclosed outside the company, treat it as confidential.



4.6 Conflicts of interest

- We avoid any relationship, opportunity to influence or activity that will compromise our ability to make fair and objective business decisions
- If we think there is, or may be, a conflict of interest, we will notify the responsible manager.



You must:

- Disclose actual and perceived conflicts of interest in order that they may be managed and recorded
- Notify your manager of any personal or professional relationships that could cause a conflict of interest
- Not provide any services or information to a current or potential competitor without prior authorisation
- Not place business with a firm owned or controlled by a colleague of Wincanton or a member of their family, without prior authorisation
- Disclose any circumstances where you may be hiring or supervising a family member, friend, or someone with whom you are personally involved
- Not have a substantial interest in a company which is, or may be a customer, supplier or competitor of Wincanton, without prior authorisation.

Wincanton

Subject matter owner:

Company Secretary, Chief People Officer

Relevant Wincanton Policies:

Conflict of Interest Policy

Things to watch out for:

Even if a conflict of interest is just perceived, you must declare it.



4.7 Privacy

- We respect the personal privacy of our colleagues and others
- We collect and process personal information only in line with our company policies and the applicable legislation in order to meet necessary business needs and legal requirements
- We keep personal information secure to maintain the privacy of individuals
- We may periodically review and monitor messages, call records and other digital information for security and other business purposes in line with applicable legislation.



You must:

- Report immediately any actual or suspected breach of data privacy to the Data Protection Team
- Respect the privacy of colleagues and individuals whose personal information you may hold or process
- Only create, save, process, hold, disclose and transfer personal information in line with our data protection policies and applicable legislation
- Speak out if you have any concerns about how personal information is processed or managed by your team or other colleagues
- Not access, retain or disclose personal information to anyone internally or externally except in line with company policies and applicable legislation
- Speak to your Data Protection Team if you are unsure.

Wincanton

Subject matter owner:

Head of Corporate Compliance

Relevant Wincanton Policies:

IT Acceptable Use Policy
Data Protection Policies

Things to watch out for:

Guidance issued by the Data Protection Team.



4.8 Media and communications

- Our reputation is a key asset and we always behave in a manner that maintains and reflects well on our brand
- Only those who have explicit permission to do so should act as a spokesperson for the company
- We sponsor activities that will meet commercial objectives and have a positive effect on the reputation of our business and its stakeholders
- We keep all our stakeholders well informed by providing information that they can access easily
- Marketing and Communications is responsible for the management of any official company presence, comments or opinions in the press or on social media and make sure that the information provided is accurate and not misleading.



You must:

- Always behave and act in a way that protects or enhances our reputation and brand when speaking about our business, colleagues or others, even when outside the workplace
- Not speak to the media or representatives of the investment community about our business without prior authorisation
- Not, as a colleague in Wincanton, use social media to post or display non-public information about the company and its stakeholders and/ or that is threatening, intimidating, harassing, discriminatory, vulgar, obscene or libellous
- Not engage in social media forums for business purposes while acting for the company without prior authorisation from Marketing and Communications
- Not use any materials requiring customer approval without their prior authorisation.

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Subject matter owner:

Marketing and Communication team

Relevant Wincanton Policies:

Social Media Policy

Marketing Resources area on MyPlace

Things to watch out for:

If representing Wincanton, only use approved materials.



5.1 Anti-bribery and corruption

- Wincanton takes a zero-tolerance approach to bribery, corruption and the facilitation of tax evasion.
- It is forbidden to pay or receive a bribe whether paid or received directly or indirectly.
- We do not offer, give or accept anything that could be perceived as, or has the effect of, unfairly or improperly influencing business decisions
- When Wincanton uses any third party to act on its behalf, only partners of known integrity and whose conduct meets our own will be engaged.

You must:

- Not give or offer, directly or indirectly, anything that is, or could reasonably be viewed to be, a bribe.
- Only offer or accept gifts, hospitality or entertainment in accordance with relevant company policies
- Make sure that all third-party representatives are approved under the relevant company policies following due diligence, and that they work with Wincanton under a valid, approved contract
- Not make facilitation payments
- Make sure all sponsorships and donations are properly authorised.



Wincanton

Subject matter owner:

Company Secretary

Relevant Wincanton Policies:

Anti-bribery and Corruption Policy

Incorporating Gifts and Hospitality Policy

Things to watch out for:

If you are offered anything, don't except without checking first.



5.2 Competition

- We comply with competition and antitrust legislation
- We believe in open and fair competition
- We conduct business in an honest and straightforward way with integrity
- We do not use competitor information that we should not have
- We do not gather competitor information by illegal or unethical means.

You must:

- Not make formal or informal agreements with competitors which result in price fixing, bid collusion, market restriction or arrangements to limit supply
- Not agree to any restrictions on customers, partners or suppliers as to whom they can trade with and how
- Not share commercially sensitive information with competitors, which may include information concerning prices, bids, sales contracts, costs, margins and operational data
- Speak up regarding suspicions or allegations of anti-competitive behaviour
- Always seek advice or guidance if you are unsure.



Wincanton

Subject matter owner:

Sales Director, Customer Bid Managers

Relevant Wincanton Policies:

Speaking up Policy

Anti-bribery and Corruption Policy

Conflict of Interest Policy

Things to watch out for:

If you're not sure, keep it confidential until you get some guidance.



5.3 Modern Slavery

- 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 have embedded a management system to enrol, record and assess suppliers prior to engagement of services (Achilles) and provide training for all colleagues who engage with supplier, recruiters and other contracts of services
 - We are committed to: no forced, bonded or involuntary labour, no child labour, all colleagues having a right to join a recognised trade union, working conditions being safe and hygienic, no harassment, threats, abuse or intimidation are tolerated, no discrimination
 - We partner with NGO 'Stronger Together', a multi stakeholder initiative aimed at tackling modern slavery across industries and their supply chains. The resources provided by the Stronger Together campaign, including multilingual posters and leaflets, are to be made available throughout our key locations.
 - Our people teams and operational leaders are required to ensure that documentation, including people facing policies and support tools are accessible for all.
- You must:**
- Keep up to date with all mandatory training requirements, including Tackling Modern Slavery
 - Managers must ensure their direct reports have attended and completed all relevant training required of their role, inclusive of inductions and Modern Slavery training
 - Contract with customers, suppliers and partners on clear terms and conditions and operate in accordance with them
 - Follow our quality, safety and sustainable procurement procedures to ensure the integrity of our products and services, responding to any concerns appropriately and working with our suppliers to find mutually beneficial opportunities or solutions to any problems that arise
 - Take appropriate action if behaviours by suppliers or partners are contrary to the Code of Conduct.

Wincanton

Subject matter owner:

Procurement Director, Company Secretary, Head of Corporate Compliance and their respective teams

Relevant Wincanton Policies:

Wincanton Code of Supplier Responsibility
Modern Slavery Policy

Things to watch out for:

Has the supplier signed up to Achilles onboarding platform?
Have you completed your Modern Slavery training in MyLearning?



5.4 Working with others

- We aim to delight our customers through our commitment to innovation and continuous improvement
- We treat customers and partners fairly and with integrity and build mutually beneficial, collaborative relationships, regardless of the scale or length of our collaboration
- We treat confidential information provided to us with respect and use it only for legitimate business purposes
- 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.

You must:

- Communicate clearly and honestly with our customers, suppliers and partners, taking care to protect commercially sensitive information and not to disclose confidential information without prior authorisation
- Make sure that all bids, contract negotiations and communications with customers and suppliers are accurate and truthful
- Comply with our supplier selection processes to make sure that suppliers are chosen objectively and on merit.



Wincanton

Subject matter owner:

Procurement Director and their respective teams and Company Secretary

Relevant Wincanton Policies:

Wincanton Supplier Code
Modern Slavery Policy

Things to watch out for:

Do our partners share our values are working collaboratively with us to achieve our goals?

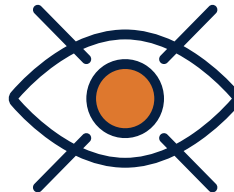


6.1 Authentic and responsible action

- We recognise that the social, environmental and financial impacts of our business and the businesses of our customers and partners extend beyond the local and national boundaries of our operations
- We encourage our colleagues to be aware of these wider impacts and believe that this encourages ideas and innovation on how we can contribute to addressing them in an authentic and responsible way
- We believe that the thoughtful actions and preparedness of our colleagues can positively affect the health, safety and welfare of others, our environment and communities everywhere and for the long term.

You must:

- Maintain an interest in local issues, wider trends and social responsibility
- Promote and support authentic and responsible action outside the work place
- Feel empowered to suggest ideas and new ways of working that deliver a sustainable future
- Get involved in Wincanton and/or site events that promote responsible business and benefit people and planet.



Wincanton

Subject matter owner:

Head of Sustainability

Relevant Wincanton Policies:

ESG Policy

Things to watch out for:

Join our viva engage groups or check out your local site noticeboards. Look at our Environment pages on MyPlace and get involved in generating ideas and taking action.



6.2 Community engagement

- We aim to be an economic and social asset to the communities in which we operate and which we affect through our business activities
- We encourage our colleagues and partners to get involved in constructive community activity as an integral part of the way we do business, supporting our sustainability and social value strategy and future success
- Community activities help us to attract, recruit, retain, and engage our colleagues whilst at the same time building a positive profile in the communities in which we operate
- Our company charitable contributions are appropriate and proportionate
- We recognise that our local actions can have global impacts and affect communities beyond the UK&I and we seek to minimise these negative impacts of our operations
- By working together with our people, supplier and customers, we will deliver 1 million hours of social value by 2025; enriching the communities that we operate in.

You must:

- Get involved with your community in whatever capacity you can and support others who are doing the same
- Participate in fund-raising or charitable activities that you are passionate about
- Make your manager and colleagues aware of what you are doing outside work as they may be able to support you
- Listen carefully to requests or concerns from the community and raise them with your management team.



Wincanton

Subject matter owner:

Head of Employee and Industrial Relations

Relevant Wincanton Policies:

Social responsibility Policies
Volunteering guides

Things to watch out for:

Tell us about your community activity - maybe we can help or support.



6.3 Political activity

You must:

- We engage with government agencies to communicate with them on matters relating to our business
- We do not make corporate contributions or donations to political parties, causes or any associated organisations. As a listed company, we are obliged to disclose any political donations in the Annual Report & Accounts
- Our business does not favour one political party over another
- In their own time and outside the business our colleagues may participate in party politics or make personal political donations
- Be transparent, honest and act with integrity in all dealings with government agencies and representatives
- Only respond to consultations or engage in lobbying for our business with appropriate prior authorisation from the Company Secretary
- Always work within the applicable legislation when lobbying for our business
- Not use our business time or resources to engage in personal political activities, without specific prior authorisation from the Company Secretary
- Not use corporate funds or assets for political donation.



Wincanton

Subject matter owner:

Company Secretary

Relevant Wincanton Policies:

Anti-bribery Policy

Conflict of Interest Policy

Things to watch out for:

Your politics are your business, not ours





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