



Wincanton

Modern Slavery Policy

Version: 3

Published: October 2023

**Owner: Head of Corporate
Compliance**

Contents

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/

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.

Purpose

The purpose of this policy is to:

- Clarify who this Policy applies to;
- Explain what people are required to do; and
- Give people the confidence to report any genuine concerns regarding wrongdoing without fear of reprisal, criticism or discrimination.

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

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

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 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.

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, on 01249 710000, via EthicsPoint 0800 086 8226 from the UK / 1 800 851 665 from Republic of Ireland or www.wincanton.ethicspoint or at Wincanton plc, 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 plc 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 Plc 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
- Grievance and Disciplinary Policies, Procedures and associated documents
- Anti-bribery & Corruption Policy
- Employee Relations Policy
- Equality & Diversity Policy
- Recruitment Policy
- Termination Policy
- Working Hours & Timekeeping Policy

Appendices

Appendix 1 Procedure

Appendix 2 How to report concerns

Appendix 3 Awareness posters

Document Control		
FUNCTION OWNER	Governance, Risk and Compliance Team	
POLICY OWNER	Head of Corporate Compliance	
POLICY APPROVAL ROUTE	EMT	
PUBLISHED DATE	October 2023	
PUBLISHED VERSION NUMBER	V3	
EFFECTIVE DATE	October 2023	
NEXT SCHEDULED REVIEW DATE	October 2024	
VERSION HISTORY		
Version Number	Key changes	Effective date
3	Revised to reflect updated requirements	October 2023

2	Reviewed - no changes made	October 2022
1	New version	January 2022

Appendix 1 - Procedure

If you believe, suspect, or are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes or could constitute any of the various forms of modern slavery, you must report your concerns as soon as you become aware.

Every report will be treated seriously and will be fully investigated.

If deemed appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

We expect all colleagues, contractors, sub-contractors and suppliers to comply with the following provisions:

- Adhere to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibit any threat of violence, harassment and intimidation
- Prohibit the use of worker-paid recruitment fees
- Prohibit compulsory overtime
- Prohibit child labour
- Prohibit discrimination
- Prohibit confiscation of workers original identification documents
- Provide access to remedy, compensation and justice for victims of modern slavery

Reporting

Anyone to whom this Policy applies must:

- report any legitimate concerns as soon as possible through their Line Manager or People Manager, if it is appropriate to do so and they feel comfortable; or
- report it in accordance with our Speaking Up Policy - via the Whistleblowing Officer directly (who is the Company Secretary) or the external, independent helpline or web portal (provided by EthicsPoint). This can be from the outset or after speaking to their Line Manager or People Manager.

Reports made via EthicsPoint are flagged to the Whistleblowing Officer as soon as they are raised. Reports can be made on an anonymous basis if you have chosen to remain anonymous.

Investigation

- All reports will be acknowledged and investigated and the likely timeline for an investigation is within 28 days. If enquiries cannot be completed within 28 days this will be explained.
- The Whistleblowing Officer will oversee the investigation of reports received.
- The format of an investigation will depend on the subject matter but will usually involve interviews with relevant people and witnesses, as well as consideration and review of any documentary evidence.
- In circumstances where there may be civil or criminal offences involved, the concern will be notified to the Police and investigated with full cooperation from Wincanton. The Company Secretary as the Whistleblowing Officer will be the Company representative and Wincanton contact for any Police investigation.

Appendix 2 - How to report concerns

Reporting hotline and web portal

EthicsPoint provides a confidential and independent helpline and system for all Employees to use to raise concerns, including anonymously, in respect of this Policy. Their contact details are:

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

Website: www.wincanton.ethicspoint

Confidentiality and Protection of Employees

Wincanton encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

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

If you believe that you have suffered any such treatment, you should inform the Company Secretary immediately and/or raise a Speaking Up concern via EthicsPoint.

This Policy is not designed to replace the Grievance Policy or associated People procedures.

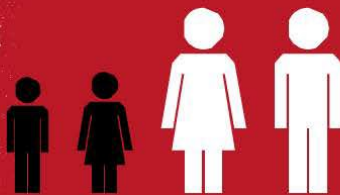
DO YOU THINK YOU HAVE COME INTO CONTACT WITH A VICTIM OF MODERN SLAVERY?

It is important to notify the Government to help build a clearer picture of this hidden crime.

Follow the steps below to help tackle modern slavery and ensure that victims who want it can get the right support.

IF YOU THINK THE VICTIM IS UNDER 18

You should complete an **NRM form**



IF YOU THINK THE VICTIM IS OVER 18

If you want to receive government support and are happy to be identified you should complete an **NRM form**

If they would like to remain **anonymous** you should complete a **duty to notify form (MS1 form)**



Visit [gov.uk](https://www.gov.uk) and search '**duty to notify**' for further details and to download NRM and MS1 forms and guidance.

In addition to the above reporting process, if the person you have encountered is in danger, you should call the police as normal.

**MODERN
SLAVERY**
modernslavery.co.uk



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!

Tell someone you trust - a manager, worker representative or friend



YOUR LOCAL CONTACT:



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

REPORT:

Gangmasters & Labour Abuse Authority (GLAA): 0800 432 0804 (Confidential)
Police: 999 (emergency)
101 (not emergency)

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www.stronger2gether.org

Modern Slavery Helpline:

08000 121 700

(confidential, 24/7)
www.modernslaveryhelpline.org/report

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