

A close-up photograph of several parallel steel rebar rods with a ribbed texture. The rods are arranged in a perspective that recedes into the distance. The lighting is warm, highlighting the metallic sheen and the ridges. The Wincanton logo is overlaid in the top right corner.

Wincanton

Speaking Up Policy

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Contents

Policy Statement 3

Purpose 3

Objectives 3

ONE PAGE POLICY 4

Confidentiality and protection of workers 5

Communication with workers 6

What is not covered by this Policy?..... 6

Personal grievances..... 6

Reporting other concerns 6

Reporting to third parties 6

External Confidential Helpline & Portal..... 7

Further advice 7

Reviews and updates..... 7

Associated policies and further information 7

Appendix 1: Procedure for reporting a concern..... 8

Making a Protected Disclosure 8

Outcome of investigation..... 9

Reporting other concerns 9

Investigation of protected disclosures 9

Appendix 2: Policy responsibilities..... **Error! Bookmark not defined.**

Policy Statement

At Wincanton, we are committed to conducting our business with our stakeholders (employees, customers, suppliers, shareholders, the communities and environment in which we operate) in a lawful and ethical manner. We believe this will encourage and maintain the highest possible standards of work ethics, including honesty, openness and accountability.

All colleagues, officers, consultants, contractors, graduates, casual and agency workers (collectively referred to here as “workers”, but not expressly or impliedly classifying any such individuals as workers for the purposes of any employment legislation or regulation) are required to act in an ethical and honest way in all business and employment matters.

Workers are often the first to recognise when these standards are not being met. Workers are therefore encouraged to report any concerns about the behaviour of Wincanton or anyone acting on its behalf that falls short of these key business principles.

Workers are required to comply with this Policy, the ‘Wincanton Way’ Code of Conduct, the Anti-bribery & Corruption Policy and any other policy setting out standards of conduct required from our workers.

Purpose

The purpose of the Speaking Up Policy is to:

- **clarify** what Speaking Up is; and
- **explain** what workers (in the broadest sense) are required to do, and how and to whom concerns should be reported.

Objectives

The Policy objectives are to:

- **encourage** an open and protected environment for concerns to be raised, investigated and properly addressed, without fear of reprisal, criticism or discrimination;
- **give assurance** of our commitment and support for workers to make fair and prompt disclosure of events or circumstances where a worker believes that Wincanton or another worker is involved, and which should be disclosed (see page 2) by appointing a dedicated Whistleblowing Officer (the Company Secretary); and
- **provide** workers with the confidence to report in good faith any genuine concerns and voice worries at an early stage, confidentially, and without fear of repercussion or retaliation, even if they turn out to be mistaken.

By promoting and supporting this Policy, we want to encourage open and honest communication to ensure Wincanton and all its workers operate its business ethically and with integrity.

ONE PAGE POLICY

If you think something is wrong, help us to help you: Speak Up

Speaking Up is the right thing to do

By speaking up, you can help develop our ethical and open culture

We want to know, so we can take action

You don't have to give your name - call or go online

UK



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

Republic of Ireland



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

📞 1800 851 665

🌐 wincanton.ethicspoint.com

What is Speaking Up?

Speaking Up, also known as whistleblowing, is the disclosure of information about actual or suspected malpractice, wrongdoing, danger or breaches of policy or regulations in relation to Wincanton's business activities and the conduct of those activities.

Reports should be made in good faith; the reporter does not need to have evidence of the wrongdoing but must 'reasonably believe' that the allegations are substantially true. Reports should not be made for the purposes of personal gain.

Protected Disclosures

Under the Public Interest Disclosure Act 1998, a worker reporting concerns that tend to show one or more of the following criteria (Protected Disclosures) has the right not to suffer detriment as a result of speaking up:

- Any criminal offence/act that has been or is likely to be committed (for example fraud, corruption, bribery, blackmail or any other financial irregularity).
- Any breach or intended breach of a legal or professional obligation (contractual or civil).
- Any miscarriage of justice.
- Any act or action that could jeopardise the health, safety, human rights or well-being of a person or group of people.
- any act that could damage, or is damaging, the environment.
- deliberate concealment of any information relating to any of the above.

Confidentiality and protection of workers

Wincanton recognises the concerns and sensitivities of raising such issues and will protect the identity of the worker who has reported the matter and treat details of the investigation with the utmost confidence. No action will be taken against them, nor will there be any threat to their future career prospects either with Wincanton or for future references for external positions.

The law offers a good measure of protection to those who raise genuine concerns about wrongdoing, in the public interest, whatever the outcome of the investigation.

Any worker who believes that they have suffered detrimental treatment as a result of raising a concern should inform the Whistleblowing Officer.

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

Communication with workers

All reports case managed through the EthicsPoint system will be acknowledged within 48 hours. They will then be updated with an indication of how the concern will be investigated and the likely timeline within 28 days. If it is not possible for initial enquiries to be completed within 28 days, the system will be updated to explain the reasons.

The level of contact with the disclosing worker will depend on the nature and severity of the concern reported, and the clarity of the information provided. We may need to contact the reporting worker for further information.

If the reporter is not happy with the way a concern has been handled, they can raise it with the Chairman, via the Head of Internal Audit.

What is not covered by this Policy?

Speaking Up is the disclosing of information about actual or reasonably suspected wrongdoing.

This policy does not cover complaints about workers' own personal circumstances, such as the way the worker has been treated at work. In such cases workers should use the relevant People policy such as Grievance Policy, Resolution Policy or the Dignity at Work (Bullying & Harassment) Policy. This Policy is not designed to replace the Grievance Policy or any People policies, related procedures or associated documents. It is not a forum for making unfounded allegations.

Personal grievances

Personal grievances are not generally regarded as protected disclosures and so are not generally covered by whistleblowing law. Workers raising concerns in bad faith (for example for personal gain or revenge), or without following the procedure outlined in this Policy, may not have the protection of the law.

Reporting other concerns

Workers may have concerns that do not fall into the protected disclosure categories described above. If they are unsure whether or not to report something, they should always [follow the procedure set out in this Policy](#) and make a report or seek guidance from the Whistleblowing Officer.

Reporting to third parties

In most cases workers should not find it necessary to alert anyone externally; however, the law does recognise that in some circumstances it may be appropriate for them to report their concerns to an external body.

External Confidential Helpline & Portal

Wincanton has partnered with a company called Navex to provide a confidential reporting system and independent helpline - EthicsPoint - for all workers to raise concerns, including anonymously, in respect of this Policy. It's free, secure and available 24/7:

UK:

Tel: 0800 086 8226 Portal: www.wincanton.ethicspoint.com

Republic of Ireland:

Tel: 1800 851 665 Portal: www.wincanton.ethicspoint.com

Further advice

If you are not sure how to proceed or wish to discuss any aspect of this Policy, you should contact the Company Secretary on 01249 710000, by email

Company.secretary@wincanton.co.uk or at the following address:

Wincanton plc
Methuen Park
Chippenham
SN14 0WT

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 and further information

- The Code of Conduct
- Anti-Bribery & Corruption Policy, incorporating Gifts and Hospitality
- Grievance Policy, procedure and associated documents
- Resolution Policy
- Public Interest Disclosure Act 1998:
www.legislation.gov.uk/ukpga/1998/23/section/1
- Whistleblowing for employees: www.gov.uk/whistleblowing
- Employment Rights Act 1996:
<https://www.legislation.gov.uk/ukpga/1996/18/contents>

Appendix 1: Procedure for reporting a concern

Workers must raise any concerns through the procedure detailed within this Policy.

If a worker is unsure whether to report a concern, they should do so as soon as they become aware.

Every report will be treated seriously and will be fully investigated. It is the responsibility of the person receiving a report of a concern to forward this to the Whistleblowing Officer, either directly or via the EthicsPoint portal.

The Whistleblowing Officer will then be responsible for allocating appropriate resources at the appropriate level for a full investigation to take place.

Making a Protected Disclosure

- In the first instance a worker should report their concern to their Line Manager if it is appropriate to do so and they feel comfortable.
- If a worker feels it would be more appropriate, they should make a report to their People Manager in the first instance. In either case, the Line Manager or People Manager will make a report by submitting a case via the EthicsPoint helpline at www.wincanton.ethicspoint.com which will automatically submit a case report to the Whistleblowing Officer.
- The worker can contact the external, independent helpline EthicsPoint on 0800 086 8226 (UK) or 1800 851 665 (Republic of Ireland) or via www.wincanton.ethicspoint.com directly and anonymously. This can be from the outset or after speaking to their Line Manager or People Manager.
- Where workers do not feel it is appropriate to report the concern to either their Line Manager or the People team, they can contact the Whistleblowing Officer directly using these contact details:
Company Secretary Tel 01249 710000, or Company.secretary@wincanton.co.uk
- EthicsPoint is a system-based solution (provided by Navex) which ensures that all reports are notified to the Whistleblowing Officer as soon as possible.
- All reports case managed through the EthicsPoint system will be acknowledged within 48 hours and updated with an indication of how the concern will be investigated and the likely timeline within 28 days. If it is not possible for initial enquiries to be completed within 28 days, the system will be updated to explain the reasons.
- Concerns will be assessed by the Whistleblowing Officer. Those that are not protected disclosures may be referred to the appropriate area of the business (People; Internal Audit; Finance for example) for investigation under the relevant policies and procedures.
- Whether the concern has been reported anonymously or not, the disclosing worker can gain access to the system at any time for an update on how the case is progressing.

- The Whistleblowing Officer has access to all reports to ensure they are addressed, investigated and concluded appropriately.

Reporting other concerns

- In the first instance a worker should report their concern to their Line Manager if it is appropriate to do so and they feel comfortable.
- If a worker feels it would be more appropriate, they should make a report to their People Manager in the first instance.
- In either case, the Line Manager or People Manager will assess whether the concern is a protected disclosure by referring to this Policy and the Whistleblowing Officer as required.
 - If the concern is a protected disclosure they will make a report by submitting a case via the EthicsPoint helpline at www.wincanton.ethicspoint.com which will automatically submit a case report to the Whistleblowing Officer.
 - If it is not a protected disclosure, it will be referred to the appropriate area of the business to investigate under the relevant policies and procedures.
- Where workers do not feel it is appropriate to report a concern to either their Line Manager or HR, they can contact the Whistleblowing Officer directly, or contact the independent helpline using these contact details:

Company Secretary Tel 01249 710000, or Company.secretary@wincanton.co.uk

EthicsPoint 0800 086 8226 (UK) or 1800 851 665 (Republic of Ireland) or via www.wincanton.ethicspoint.com

Investigation of protected disclosures

Protected disclosures made by workers will be taken seriously and dealt with confidentially and sensitively, through a prompt and detailed investigation.

All genuine protected disclosures will be investigated by the Whistleblowing Officer and/or the Head of Internal Audit, or such other responsible person as they may identify.

The format of an investigation will depend on the subject matter but will usually involve interviews with relevant people and witnesses (including the disclosing worker), as well as consideration of any documentary or other evidence (such as CCTV).

If the concern is covered by another Policy, and it is appropriate to do so, it will be referred for investigation to the appropriate Central Support Function to investigate.

Some concerns may be capable of resolution by agreed action without the need for more detailed investigation, or they may have already been investigated or dealt with under an alternative process or notification.

If the decision is taken to not investigate further, we will give an explanation to the disclosing worker.

Investigations will usually be undertaken by a member of Senior Management in Wincanton (duly appointed by the Whistleblowing Officer) who is independent of the worker and of their business area, and who has no direct or indirect interest in the area of concern. Senior Managers or external advisers with specialist knowledge of the area of concern may be brought in, if appropriate.

If appropriate and the worker is known, the independent investigator will arrange a meeting with the worker as soon as possible, to discuss the concern. Workers may bring a colleague or union representative to any meetings under this Policy, but any companion must respect the confidentiality of the disclosure and any subsequent investigation.

In circumstances which may involve civil or criminal offences, the concern will be notified to the Police or appropriate Regulator and investigated with full cooperation from Wincanton. The Company Secretary as the Whistleblowing Officer will be the Company representative and Wincanton contact for the Police investigation or that carried out by the appropriate Regulator.

Outcome of protected disclosure investigation

- The worker will be advised of the outcome of the investigation as soon as practicable. The level of detail provided will be subject to the constraints of the Company's duty of confidentiality or any other legal constraint.
- Reports and recommendations will initially be received and reviewed by the Company Secretary in their capacity as Whistleblowing Officer.
- Dependent on the findings, recommendations for actions will be made to the relevant Senior Management and managed through to resolution by the Executive Management Team under supervision of the Wincanton plc Board of Directors.
- In certain circumstances, such as criminal activity, the matter will be notified to the relevant external bodies with the remit and authority to deal with the matter and take the appropriate actions. Wincanton will fully cooperate with all external bodies to the extent required.
- Regardless of the outcome of any investigation, all concerns reported under the Speaking Up Policy will be reported to the Wincanton plc Board of Directors, through the Audit Committee.