

Wickes Group plc - Modern Slavery & Human Trafficking Policy

At Wickes, **how** we work is as important as **what** we do.

Our **Winning Behaviours** underpin the way we work and guide us to **do the right thing**.

This means that we have a zero tolerance policy on modern slavery and human trafficking

Quick Read

What does this policy address

This policy defines the steps we need to take in order to mitigate the risk of modern slavery and human trafficking both in the business and in the supply chain. This is not only in order to meet the legislative requirements of the UK Modern Slavery Act 2015 but also our moral obligations to our customers, suppliers, employees and wider society.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our business or in any of our supply chains.

Doing the Right Thing

- We assess Modern Slavery and Human Trafficking risks in our business and supply chain.
- We conduct due diligence on labour agencies to reduce the risk of slavery.
- We conduct due diligence on contractors to reduce the risk of slavery.
- We define clear supplier expectations and assess supplier compliance according to identified risk.
- We provide support and guidance to suppliers on their due diligence programmes.
- We provide regular training to employees including the 'red flags' of Modern Slavery and Human Trafficking.
- We provide a whistleblowing line and Whistleblowing portal for colleagues to anonymously report any concerns.

What this means for you

- **Do** read, understand and comply with this policy.
- **Do** treat other people with dignity, fairness, equality and respect.
- **Do** keep an eye out for your co-workers and keep the signs of modern slavery in mind (as detailed below in this policy).
- **Do** recruit in line with Wickes recruitment policies.
- **Do** make sure due diligence has been conducted on suppliers, labour agencies, freighting companies or contractors that you deal with.
- **Do** complete your Modern Slavery and Human Trafficking training.
- **Do** report any known or suspected modern slavery or human trafficking incidents as soon as possible to the Legal Team or via our anonymous Whistleblowing line on 0800 949 6396.
- **Do** avoid confronting an individual directly if you have a concern (and report your concern in accordance with the procedures listed above and described in this policy).
- **Do** use our preferred agencies to appoint temporary labour into the distribution centres for which due diligence processes are in place.

Who does this policy apply to?

This policy applies to all officers, employees and temporary workers (such as consultants, contractors, casual and agency staff) of Wickes Group plc ("the Company") and its subsidiaries (together "colleagues"). This policy does not form part of any colleagues employment contract and we may amend it at any time.

Where to go for help

Policies and guidance can be found under 'Business Ethics - Doing the Right Thing' and you can also speak to your line manager or contact the Legal team for advice.

Failure to comply

A breach of this Policy, whether intentional or otherwise, may lead to disciplinary action and in some instances may also result in you committing a criminal offence which could result in a significant fine or imprisonment.

Approved by the Wickes Group plc Executive Board on 26 June 2024.

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1. Introduction

Wickes is committed to conducting business honestly, professionally and fairly, and with care for our people and the people within our supply chains. We take a zero-tolerance approach to modern slavery and human trafficking.

The Modern Slavery Act 2015 (the “MSA 2015”) states clear expectations of businesses to eradicate slavery both within the workforce and in the supply chain. It is important that all employees, officers, directors and other third parties conducting business with us, including contractors and suppliers, comply with this policy.

2. Scope

This policy applies to all officers, employees and temporary workers (such as consultants, contractors, casual and agency staff) of Wickes no matter where they are located or what they do. It is our joint responsibility to ensure that we comply with this policy in our daily working lives regardless of whether local law or practices might permit something to the contrary.

As part of our commitment to prevent modern slavery and human trafficking we must ensure that suppliers and other third parties also comply with effective modern slavery and human trafficking policies. Accordingly, we have an obligation to complete sufficient due diligence and to periodically monitor their performance to ensure ongoing compliance.

3. What is Modern Slavery and Human Trafficking?

The key terms as defined in the MSA 2015 and construed in accordance with other legislation, are as follows:

- 'Slavery' is where ownership is exercised over a person;
- 'Servitude' involves the obligation to provide services imposed by coercion;
- 'Forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily; and
- 'Human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

It was estimated in 2020 that almost 50 million people worldwide were victims of modern slavery, almost 13,000 of which were in the UK.

Section 54(1) of the MSA 2015 requires commercial organisations that carry out business in the UK with a total turnover of £36 million or more to produce a slavery and human trafficking statement each financial year. The statement must (i) set out the steps the company has taken during the financial year to ensure that modern slavery is not occurring in their supply chains and in their own organisation; (ii) be approved by the company board and signed by a director (or equivalent); and (iii) be made available on the homepage of the company’s website.

Signs of Modern Slavery

Signs of modern slavery may include:

<ul style="list-style-type: none">● Withholding of wages● Excessive overtime● Abusive working/living conditions	<ul style="list-style-type: none">● Debt bondage● Intimidation and threats● Restriction of movement
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<ul style="list-style-type: none"> Retention of ID documents Physical or sexual violence 	<ul style="list-style-type: none"> Limited family or social contact Abuse of vulnerability
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4. How do I know?

It is not always immediately apparent if a person is a victim of modern slavery, but some questions to ask yourself are:

Is the worker being controlled?	<ul style="list-style-type: none"> Were they introduced to the company by a person claiming to be their family member or friend? Does somebody speak on behalf of them, acting as an interpreter? Has somebody befriended staff and offered to provide workers at short notice?
Are there red flags in their application?	<ul style="list-style-type: none"> Is there a person present who is acting as an interpreter? Are you seeing similar errors or the same handwriting on multiple forms/references? Are there scant details on the application form?
How is the applicant behaving?	<ul style="list-style-type: none"> Does the job applicant seem frightened, agitated, secretive and acting as though they are being instructed by someone else? Is the applicant unable to speak the language of the country where the job will be? Do the applicant's responses appear to be scripted?
What contact number has the applicant provided?	<ul style="list-style-type: none"> Is there either no contact number or they have provided the number of someone else? Is the contact number the same for several workers? Are you seeing sequential contact numbers for applicants? Is the contact number the same for the worker, next of kin and emergency contact?
What is the situation with their bank account?	<ul style="list-style-type: none"> Does the worker not have a bank account or access to their bank card? Are the same bank account details provided for multiple workers? Is the PIN number for the bank card written on the back of it?
What are the worker's living arrangements?	<ul style="list-style-type: none"> There is evidence of multiple occupancy of the same addresses (3+) The accommodation (if known, i.e. on site at a factory) is poor quality or overcrowded The worker does not know their address or their landlord's details The worker rents accommodation from their employer
What are the worker's transport arrangements?	<ul style="list-style-type: none"> Workers are transported to work in a mini bus or people carrier Workers are known to be charged excessive transport costs Workers are transported to work accidentally on non-work days or are not collected from work on scheduled work days
How would you rate the worker's wellbeing?	<ul style="list-style-type: none"> Does the worker's lifestyle not reflect monies earned? (i.e. poor health, unkempt) Does the worker choose not to engage with other workers/staff? Does the worker look malnourished or do they have injuries? Is the worker registered with their local doctor and dentist?
How could you spot red flags in the workplace?	<ul style="list-style-type: none"> Does the worker appear to be controlled in the workplace? Is there an increase of same nationality workers as their supervisor/recruiter? Is there an increase in near misses or reported accidents at work? Are the workers always working (i.e. working overtime, no holiday taken)?
Is there a trend in staff turnover?	<ul style="list-style-type: none"> Has there been an increase in turnover of staff? Has there been an increase in turnover of staff based on nationality? Have staff been leaving that have connections to staff members/recruiters who leave?
Is the worker aware of their own pay?	<ul style="list-style-type: none"> Does the worker receive their payslips and they are aware of their actual pay? Is the worker reluctant to answer questions?

The answer to these questions may help to determine whether a colleague or a worker in the supply chain is being exploited. Whilst one red flag in isolation may not indicate a slavery issue, if you start to see multiple red flags you should raise your concerns with a line manager or through the Whistleblowing service. In the event of uncertainty any issues should be discussed with a line manager or reported via our Whistleblowing service 0800 949 6396 or [Whistleblowing portal](#).

5. Policies and Procedures

5.1 Employee Recruitment

Employee recruitment should be completed in line with the Wickes Recruitment Policy and all 'Right to Work' documents should be checked in accordance with UK law. This includes:

1. obtaining original versions of one or more of the acceptable documents
2. checking the documents' validity in the presence of the document owner
3. making and retaining a clear copy of the document(s), recording the date the check was made

Applicable Right to Work documents include for example:

- Passport
- National Identity Card; and/or
- Residence Card

Full lists of acceptable documents, based on employee contract type (i.e. permanent or temporary), can be seen on p.14 of [The Employer's Guide to Right to Work Checks](#) and in the associated Annexes in that document.

5.2 Temporary Employee Recruitment

Employee recruitment should be completed in line with the Recruitment Policy.

Where labour agencies are used for manual labour in any of our distribution centres, the contract with the labour agency should specify the level of due diligence expected of them to prevent modern slavery. The clauses you should include in contracts with labour agencies are available through your HR Recruitment Teams. An 'Agency Worker Right-to-Work Sign-Off' sheet should be provided by the labour agency for each worker and checked by the DC team against the worker's original Right to Work documents on their first day of employment.

These controls are in place to prevent the abuse of workers.

The one-off Right to Work checks at our sites give us confidence that the right workers have turned up and that they are in possession of their own identification documents.

5.3 Appointment of contractors

Contracts with any contractors should specify the level of due diligence expected of the contractor to prevent modern slavery. The clauses you should include in contracts with contractors are available through the Legal team.

Contractors or subcontractors working on behalf of Wickes should evidence their Right to Work documents on their first day of employment.

As with temporary employee recruitment, these controls help us to prevent the abuse of workers.

Contracted employees, such as those contracted from cleaning companies, can sometimes be paid cash in hand and may therefore be more exposed to gang control. Often gangs will confiscate a victim's ID to prevent them from escaping and so this is something to be aware of when recruiting.

5.4 Supplier Risk Assessment and Due Diligence

We conduct risk assessments on suppliers and suppliers are assessed to identify if they may be a risk to our business. This includes checks on the:

1. **country** in which the supplier operates or trades in, to identify those in countries with a higher risk of corruption and modern slavery. This is assessed using the World Governance Indicators for corruption, the Transparency International Corruption Perceptions Index and the Global Slavery Index.
2. **supplier product type** to identify those producing products with a higher known-risk of slavery. This is assessed using the “US Department of Labor List of Goods Produced by Child Labor or Forced Labor” and any other product categories known to use seasonal manual labour.
3. **supplier service type** to identify those more exposed to slavery. This includes (but is not limited to) freighting companies (exposed to trafficking risks) and cleaning companies, waste management companies or facilities management or property contractors (exposed to slavery risks).

Suppliers can access through the Supplier Manual the Wickes Commitments, available on our corporate website www.wickesplc.co.uk - these clearly state expectations around slavery due diligence. They are also required to complete a Supplier Online Risk Assessment (SORA) to provide further information.

We must not engage any third party that we know or reasonably suspect of engaging in modern slavery or human trafficking.

Appropriate due diligence should be undertaken on all organisations before they are engaged to work with us. The appropriate level of due diligence will vary depending on the type of organisation and the identified level of risk, as detailed in this policy.

Every effort should be made to use suppliers which are already approved by Wickes. New suppliers are required to complete the SORA before trading begins.

6. Compliance with Policy

Any failure to comply with this policy, intentionally or otherwise, may lead to disciplinary action (up to and including dismissal).

In addition, if Wickes fails to comply with the reporting requirements of the MSA 2015, the business could be served an injunction ordering the company to publish a statement. If an individual is found to have had personal involvement in criminal offences under the MSA 2015, the individual could face imprisonment and/or significant fines.

7. Reporting Concerns

If you are concerned for yourself, a colleague (whether a direct employee or agency employee) or a worker within the supply chain, then report or discuss this with your line manager and notify the Legal team.

You can also call our Whistleblowing line (0800 949 6396) or use the [Whistleblowing portal](#) to raise any concerns anonymously.

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We know it takes courage to speak up and you will not suffer any detrimental treatment as a result of raising a genuine concern. Please see our [Whistleblowing Policy](#) for more information.

Approved by the Wickes Executive Board on 26th June 2024