

Wickes Group plc - Charity & Community 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 making a difference where we can.

Quick Read

What does this Policy address

We have a long history of supporting national charities (through our corporate partnerships) and local good causes (through our community programme) by raising money, giving time, and donating products that make a real difference to our communities. When we do, it's important we do our homework and check that the organisations we help are appropriate, legitimate and are helping our communities in the way we'd expect. We want to be sure that any contributions we make don't cause harm to our reputation and that our colleagues are protected from legal or financial challenges.

Doing the right thing

- We will align all of our charitable and community engagement actions and activities to help deliver our core purpose to help the nation feel house proud.
- We will support our charitable partnerships and community activities by raising money, giving colleague time and product donations.
- Our charitable and community engagement actions will deliver the charity and community objective of our Responsible Business Strategy which is to empower and support our colleagues to give back to their local communities. It will also create positive, sustainable change and deliver a measurable positive impact to the business.
- We will have one strategic partnership with a registered UK charity, and we will conduct due diligence on all prospective strategic charity partners following an agreed process (see section 3.1).
- We will support the following (collectively called 'good causes'):
 - Not-for-profit organisations, including registered charities, Community Interest Companies (CICs), state-funded schools, community groups and community organisations;
 - Based in and supporting their local communities in the UK where we operate (England, Scotland and Wales).
- We will not support:
 - Organisations or any groups that generate profit for private gain.
 - Organisations that discriminate on the basis of age, disability, gender, race, religion or belief, sex, or sexual orientation, and other protected characteristics.
 - Religious activity - however we do support religious organisations if their projects benefit the wider community.
 - Political parties, groups, individual candidates or causes.
 - Projects which create the appearance of bribes, kickbacks, or other corrupt practices.
 - Initiatives and fundraising events which are a personal appeal by, or on behalf of, an individual.
- The following will be considered on a case-by-case basis:
 - National and international emergency support and fundraising activities.
 - Projects, services and initiatives run by Local Authorities.

What this means for you .

- **Do** support our national corporate charity partner through fundraising activities.
- **Do** support our local good causes through donating products inline with the Community Programme guidance.
- **Do** take the opportunity to share your time, skills and know-how with good causes in our local communities through volunteering.

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- **Do** only support charities and local good causes in line with this Policy and within your authority when acting on behalf of Wickes.
- **Don't** allow funds to be given to support any charities or activities that may harm Wickes' reputation.
- **Don't** pressurise customers or suppliers to make donations.

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 and its subsidiaries.

The policy does not form part of the Company's contracts of employment. The Company reserves the right to withdraw or modify this policy at any time and reserves the sole right of interpretation.

Where to go for help or support

Policies and guidance can be found on our internal Intranet site 'The Scoop' under Business Ethics - Doing the Right Thing and you can also speak to your line manager or contact the Legal team for advice. In addition, you can contact the:

- Charity team via charity@wickes.co.uk for queries about our corporate charity partner.
- Community team communityprogramme@wickes.co.uk for queries about how we donate products.

Failure to comply

Whilst we understand that colleagues who are supporting charities or community projects, are doing this for positive reasons, in a minority of situations there could be risks and even penalties for Wickes if we do not follow this policy. In these cases, feedback will be given to colleagues on appropriate action required. In the unlikely event that colleagues do not respond to the feedback, this may lead to disciplinary action (refer to the Disciplinary and Appeal Policy).

Review

This policy will be reviewed from time to time to ensure it reflects our legal obligations and business needs. Therefore we reserve the right to amend and/or withdraw this policy at any time at our discretion.

Approved by the Wickes Executive Board on 19/08/2024.

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1. Introduction

Our Responsible Business Strategy sets out how we will support our purpose to help the nation feel house proud. This includes an objective to build a business we are proud of, where all our colleagues can feel at home and are empowered to support their communities and customers.

We have three key ways that we support our communities:

- Fundraising for our corporate charity partner.
- Donating products to our local communities through the Wickes Communities Programme.
- Colleague volunteering during work time for local good causes.

2. Scope

This policy applies to all officers, employees and temporary workers (such as consultants, contractors, casual and agency staff) of Wickes Group plc (“the Company”, “we” or “Wickes”) and its subsidiaries (together “colleagues”). This policy does not apply to agency workers, self employed colleagues, Interns or non-colleagues. 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.

3. Policies and Procedures

3.1 Charitable Giving

3.1.1 Corporate Charity Partner - Selection Process

<p><i>What is this?</i></p>	<p>When we are selecting a new corporate charity partner, we have developed selection criteria which align with this policy. Our colleagues will be invited to propose new charity partners in line with this criteria.</p> <p>Selection criteria: Any charity partners being considered must be a UK registered charity, have a nation-wide UK presence and their charitable objectives must benefit our society across the UK (e.g. health charities, education charities etc). We look to support smaller charities with an income of between £5-£8m million so we can use our scale for good and make a material difference.</p> <p>A long-list of charities is generated from colleague submissions across the business that meet a set of criteria set by the Charity Committee. A short-list of charities that meet the selection criteria will be discussed with the Charity Committee, and then proposed to the Wickes Executive Board. A final list of four preferred charities is then put to the vote of all Wickes colleagues, and the charity with the most votes is chosen.</p>
<p><i>Why do we do it?</i></p>	<p>It is important that the business enters into a fundraising partnership with a charity that resonates with the majority of our colleagues. Our successful fundraising activities are dependent upon our colleagues doing their best, including giving their time, energy and enthusiasm.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>The Charity Manager and the Internal Comms team will manage this process as and when it is required, and will hold all relevant files.</p>

3.1.2 Corporate Charity Partner - Fundraising Collaboration Agreement

<p><i>What is this?</i></p>	<p>The Fundraising Collaboration Agreement is a formal agreement between Wickes and the corporate charity. It agrees that Wickes will encourage colleagues across the business to participate in fundraising activities with a view to benefitting the charitable objectives of the corporate charity and aim to meet a target fundraising amount.</p> <p>One of the conditions of the formal agreement is that the charity partner agrees to fund the Charity Manager, who will be dedicated to leading the charitable fundraising activity within the business.</p>
<p><i>Why do we do it?</i></p>	<p>We formalise the relationship with the corporate charity partner to ensure that our fundraising activities comply with applicable legislation and codes of practice, such as Charities Act 1992. See appendix for further information.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>The Charity Manager in the Marketing Team is the custodian of the Fundraising Collaboration Agreement, which is also filed on Dealtrack.</p>

3.1.3 Corporate Charity Partner - Arrangements

<p><i>What is this?</i></p>	<p>The Wickes Charity Manager is responsible for facilitating all aspects of the management of the partnership and fundraising activities, with the Chief Marketing Officer accountable overall.</p> <p>The partnership is guided by our Charity Chair/Deputy Chair and Charity Committee. Charity Champions are appointed in each store and support functions to support with organising fundraising activities.</p> <p>Any fundraising activities that are organised must meet the guidance and best practice set out by Wickes in order for the company to meet relevant legislation. Events must also properly consider the safety and wellbeing of those involved and complete a risk assessment. Fundraising activities include customer donation periods in stores and fundraising undertaken by colleagues through Just Giving, as well as events with suppliers (such as charitable golf days). The Wickes Charity Manager will coordinate and oversee these events to ensure they meet the guidance.</p> <p>The finance team manages all money collected by Wickes through fundraising activities, and organises for donations to be made to the charity partner.</p>
<p><i>Why do we do it?</i></p>	<p>Through our formal agreements with our corporate charity partners, we make a commitment to mutually work towards a fundraising target. It is important that we meet this commitment, both for the charity partner (who will be relying on this to fund their charitable programmes and activities) as well as for Wickes' brand and reputation. See appendix for further information.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>Guidance for colleagues on fundraising activities is available on Wixapedia and the charity page on Wickes' intranet site (The Scoop).</p> <p>The Finance team in support of the charity committee holds all records of charitable fundraising and corporate donations undertaken by the company.</p>

3.1.4 Other Charitable Donations

<p><i>What is this?</i></p>	<p>In the event that the business decides to undertake fundraising activities other than with our corporate charity partner, or make a direct donation from Wickes to any charitable cause, this must be approved by the Wickes Executive Board. The Charity Manager will communicate with the existing corporate charity partner in accordance with the Fundraising Collaboration Agreement.</p> <p>Stores are not permitted to raise monies for independent charities without authorisation or communication from the Charity Manager (with the exception of the British Royal Legion's Poppy Appeal held every November, or Cash for Kids Mission Christmas Appeal held every November-December). Questions can be directed to charity@wickes.co.uk if there are any queries.</p> <p>Colleagues who wish to undertake fundraising activities for charities other than with our corporate charity may do so as a personal activity, outside their employment and any volunteering time agreed by line managers and the business. The company provides an optional benefit for colleagues to donate directly from their pay via Give As You Earn (GAYE).</p> <p>Some sponsorship and PR activities may involve sponsoring local charities and/or good causes (for example, a colleague's local youth football team requests for sponsorship of team kit). Local community sponsorship requests should be referred to the Community team in Marketing to ensure there are no conflicts of interest, in line with our Conflicts of Interest Policy communityprogramme@wickes.co.uk</p>
<p><i>Why do we do it?</i></p>	<p>Occasionally, there may be certain situations where the business decides to provide other charitable donations, other than with our corporate charity partner. For example, in the situation of a national or international emergency, or corporate PR and sponsorship. This is most likely in the cases where both colleagues' and customers' sentiment results in this being the right thing for Wickes to do at that time. It is important that this is managed in a way that meets the principles of this policy, any active Fundraising Collaboration Agreements and the Conflicts of Interest Policy.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>The People Team holds records of colleagues who are enrolled onto the Give As You Earn benefits programme.</p> <p>The Finance Team holds all records of charitable fundraising and corporate donations undertaken by the company.</p> <p>The Conflicts of Interest Policy is available on the Wickes intranet site, The Scoop.</p>

3.2 Wickes Community Programme

3.2.1 Community Programme - Vetting Good Causes

<p><i>What is this?</i></p>	<p>The decision to donate products through the Community Programme to a local good cause is down to the discretion of each store, with the Store Manager taking the overall decision. The Regional Manager holds the overall budget for each region.</p> <p>Local community good causes that are eligible are:</p> <ul style="list-style-type: none"> ● Not-for-profit organisations, including registered charities, Community Interest Companies (CICs), state-funded schools and pre-school organisations, community groups and community organisations (e.g. sports organisations, youth groups). The local group does not need to be a registered charity however it must serve the community rather than individuals. ● Based in and supporting their local communities in the UK (England, Scotland and Wales). <p>The Community Programme is not for sponsorship or fundraising opportunities (for example, product donations for fundraising through raffles and tombolas). And products will not be donated to the following:</p> <ul style="list-style-type: none"> ● Organisations or any groups that generate profit for private gain. ● Organisations that discriminate on the basis of age, disability, gender, race, religion or belief, sex, or sexual orientation, and other protected characteristics. ● Religious activity, however we do support religious organisations if their projects benefit the wider community. ● Political parties, groups, individual candidates or causes. ● Projects which create the appearance of bribes, kickbacks, or other corrupt practices. ● Initiatives and fundraising events which are a personal appeal by, or on behalf of, an individual. ● National and international emergency support and fundraising activities. ● Projects, services and initiatives run by Local Authorities. <p>If colleagues are unsure of the eligibility of an organisation or group requesting a donation via the Wickes Community Programme, they can contact communityprogramme@wickes.co.uk</p>
<p><i>Why do we do it?</i></p>	<p>The purpose of the Community Programme is to donate products to renovate and renew projects/areas in need, that result in a benefit to the local community. It is our way of positively impacting the local community, and also promoting Wickes to colleagues, customers and communities.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>The Community Team holds records of local good causes supported through the Community Programme, where store colleagues have completed the Google form.</p>

3.2.2 Community Programme - Donating products

<p><i>What is this?</i></p>	<p>Each store has an annual budget to donate Wickes stocked products to local community groups and good causes. Where possible, obsolete, returned or damaged (but still safely usable)</p>
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	<p>products will be prioritised for donations. Stores can advertise these on local social media groups.</p> <p>Good causes may contact stores directly, or via Wickes' social media when the Marketing Team will then connect the Good Cause with their nearest store. To boost engagement within stores and their local community, each store should nominate a Community Champion.</p> <p>The Store Manager should carry out reasonable due diligence on the validity of the person requesting the donated product on behalf of the good cause. For example, evidence of a valid email address of the charity or community organisation, and a website or active facebook page indicate that the person is acting on behalf of the good cause, and that the good cause meets the criteria set out in 3.2.1.</p> <p>Products that are covered by age-restricted sales legislation, and therefore are part of Challenge 25 are not eligible to be donated through the Wickes Community Programme. This includes products such as:</p> <ul style="list-style-type: none"> ● Knives, axes, razor blades ● Solvents, including glues and intoxicating substances ● Petrol, paraffin and liquefied petroleum gas ● Aerosol spray paints
<p><i>Why do we do it?</i></p>	<p>The Wickes Community Programme is a dedicated product donation fund to help support the local communities near to our stores. The aim is to bring together donation support into an umbrella programme, and allow us to showcase how Wickes is collectively helping our local communities.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>Wickes Community Programme Guidelines and a link to the Wickes Community Programme Google notification form is on Wixapedia.</p> <p>The Wickes Community Programme team responds to specific queries via communityprogramme@wickes.co.uk.</p> <p>The Community Team produces a monthly report showing the level of engagement of stores in the programme, the value of stock donated in the period and total for the financial year, and highlighting press coverage and case studies.</p>

3.2.3 Community Programme - Financial accounting

<p><i>What is this?</i></p>	<p>Product donations through the Community Programme must be managed in accordance with the business's stock management process, to ensure we maintain stock accuracy, prioritise the donation of non-stocked (surplus stock), and donate stocked products in line with agreed budgets.</p> <p>When stores are required to write-off stock through Code 51, these should be prioritised for donating through the Wickes Community Programme. When stores are donating stocked projects, these must be recorded through the till using Code 55.</p> <p>Stores need to also complete the Wickes Community Programme Google form to provide additional information to the Marketing team on the Good Cause receiving the donation.</p>
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<i>Why do we do it?</i>	The donation of products to local good causes benefits our local communities, but must also be carried out and recorded in a way that ensures we follow appropriate rules, such as VAT requirements.
<i>Where can I find the relevant files?</i>	The Store Ops team manages the stock adjustment process, with information provided on Wixapedia. The Finance team monitors the products donated through Code 55 in line with the agreed Store Ops team budget.

3.3 Corporate reporting

<i>What is this?</i>	Wickes reports charitable giving and community engagement activities each year as part of our Responsible Business update in the annual financial report. This data may be subject to internal and external assurance. Therefore, a record is kept of key metrics and indicators and coordinated by the Sustainability team.
<i>Why do we do it?</i>	It is important that we show our stakeholders that we are running our business responsibly, and meeting our Responsible Business Strategy public targets. It is also important that we can show how we are maximising the positive impact of our charity and community giving activities.
<i>Where can I find the relevant files?</i>	The Sustainability team coordinates a Responsible Business dashboard for regular internal reporting to the Executive and Plc Boards. This data is also used for our annual corporate sustainability reporting to our stakeholders.

4. Reporting Concerns

We hope that in many cases you will be able to raise concerns with your line manager or another manager at Wickes. You may tell them in person or put the matter in writing if you prefer. They may be able to find a way of resolving your concern quickly and effectively. However, if you feel your line (or other) manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact our anonymous **Whistleblowing service via the helpline on 0800 949 6396** or via the **Whistleblowing portal**.

5. Related Policies

- General Absence Policy
- Delegation of Authority Policy
- Treating People Equally Policy
- Code of Business Ethics
- Conflicts of Interest Policy
- Health and Safety Policy

6. Policy Owner

Owner: Legal & Sustainability and Marketing



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Appendix 1. Rules when fundraising for our corporate charity partner

The rules are set out in the UK's Fundraising Regulator's Code of Fundraising Practice (2021)

<https://www.fundraisingregulator.org.uk/code>

These values must be followed when colleagues are undertaking fundraising on behalf of Wickes

- **Legal:** All fundraising must meet the requirements of the law.
- **Open:** Fundraisers must be open with the public about their processes and must be willing to explain (where appropriate) if they are asked for more information.
- **Honest:** Fundraisers must act with integrity and must not mislead the public about the cause they are fundraising for or the way a donation will be used.
- **Respectful:** Fundraisers must demonstrate respect whenever they have contact with any member of the public.

Wickes is a third-party fundraiser raising money on behalf of our corporate charity partner, for which we have a legal agreement, which means we have been authorised by the charity to ask for donations on its behalf.

Wickes colleagues must only ask customers for donations to the approved Wickes corporate charity partner. Colleagues must not ask customers to cancel or change an existing donation in favour of a donation to another charity.

All fundraising activities carried out by Wickes colleagues must meet the following criteria:

- We must be equitable and not discriminate against people due to protected characteristics.
- We must not accept donations if we know or have good reason to believe that a person is vulnerable or lacks capacity to make a decision.
- All money fundraised for the corporate charity must be given to the corporate charity.