

# Supplier Code of Conduct





# Dear Supply Partners

I am pleased to welcome you to our Supplier Code of Conduct (the “Code”). This Code applies to all suppliers and contractors who supply products or services to Wickes and its Group Companies (referred to collectively in this document as “Suppliers”). The Code sits alongside your Wickes supplier contract, and for our suppliers providing us with goods, the Wickes Supplier Manual, and any other document provided from time to time.

Wickes’ values are based on doing the right thing for our customers, colleagues, shareholders and third parties, and we commit to conducting our business with honesty, integrity and openness, respecting the rights and interests of all. As CEO at Wickes, it is very important to me that we work with Suppliers who share this same commitment.

We understand the importance of strong collaborative Supplier partnerships that uphold the highest standards of service and ethical practices, evidenced by many of our long-standing Supplier relationships. This Code sets out our legal and ethical requirements for all Suppliers, according to both the law and our core values and standards.

We expect all of our suppliers to implement systems, policies and processes to ensure that the requirements set out in the Code are met, both within your own organisation and throughout your supply chain. This is to enable consistently high standards of legal, social and environmental responsibility. We recognise the different circumstances of our Suppliers and are committed to working with you to help you meet the requirements of this Code.

I want to know if there is any actual or potential breach of this Code, or any concerns relating to it, so please reach out to your usual Wickes contact or to me directly. If you want to raise a concern anonymously, please use our Whistleblowing service. I strongly believe that by working together, we can and will maintain a safe, successful and ethical business.

Thank you for your partnership.

**David Wood**  
**Wickes Group PLC**  
**CEO**

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## Reporting concerns

We really want to know if you or any third party has a concern about unlawful behaviour or if you believe that this Code of Conduct has been breached and we will expect your support in investigating any reports of wrongdoing. We encourage you to speak to your contact at Wickes or, if more appropriate, to contact the Wickes Legal team. If you would like to report a concern anonymously, you can call our Whistleblowing Helpline on 0800 949 6396 or make a report via our Whistleblowing portal.

We take all concerns reported very seriously and your courage to speak out helps us maintain a fair, transparent and respectful workplace for everyone. Suppliers are expected to provide a similar anonymous whistleblowing service for their own supply chain to raise any concerns.

# 1. Labour and human rights

Wickes is committed to treating people with fairness, dignity, and respect by upholding internationally recognised human rights principles both in our business and throughout our supply chains. We promote positive working conditions and practices throughout our supply chain and we commit to meet the principles of the Ethical Trade Initiative (ETI) Base Code. We expect all Suppliers operating on our behalf to operate in the same way, and we aim to work collaboratively and create relationships that enable transparency throughout our supply chains. The following Wickes policies provide more information on our commitments and approach: Human Rights Policy, Modern Slavery and Human Trafficking Policy, Responsible Sourcing Policy.



## a. Modern slavery

Suppliers must ensure all their labour is voluntary and there must be no use of modern slavery through forced, bonded, involuntary, prison labour or human trafficking. Workers must be free to leave work and terminate their employment or other work status with reasonable notice. Worker's original identity and right-to-work documents (such as passports) must not be indefinitely held by their employer, or any related third party (such as agents), for any reason other than appropriate administration processing, and be immediately returned.

Suppliers must not require workers to pay recruitment fees or deposits for their employment to their employer or any third party agents, such as labour providers. If any such fees are found to have been paid by workers, such fees must be repaid to the worker. Workers must be given clear, understandable documentation that defines the terms and conditions of their engagement in a language and manner understood by the worker.

Suppliers must ensure their operations are free from child labour. Child labour must not be used in any stage of manufacturing and/or the supply of materials, goods or services. In this Code, "child" means anyone under 15 years of age. Workers under the age of 18 years of age must not perform hazardous work that is likely to jeopardise their health, safety or that compromises their education (e.g. night shifts, overtime).

## b. Working conditions

Suppliers must ensure all workers are treated with dignity and respect. Discipline in the form of physical abuse, the threat of physical abuse, sexual or any forms of harassment and verbal abuse, bullying and victimisation or other forms of intimidation must be prohibited. An effective reporting mechanism must be made available to report a breach without fear of reprisal.

Suppliers must ensure wages, benefits and wage deductions comply with all relevant local and national laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits. Wages are to be paid directly to the worker and deductions from wages as a disciplinary measure are not permitted. For each pay period, workers must be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

Suppliers must ensure that standard working hours do not exceed legal limits and overtime must not exceed the maximum allowed by law. A workweek should not be more than 60 hours in any seven day period, including overtime, except in emergency or exceptional situations. Any overtime must be voluntary, and workers must receive adequate compensation for any overtime worked. Suppliers must allow workers at least one day off in every seven days.

Suppliers must keep and maintain complete and accurate records about working conditions (e.g., wage and working hour records).

## c. Freedom of Association and reporting concerns

Suppliers must allow workers the right to join or form trade unions of their own choosing. Where the right to freedom of association and collective bargaining is restricted under law, Suppliers should facilitate, and not hinder, the development of parallel means for independent and free association and bargaining. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, retaliation, intimidation, or any forms of harassment.

Suppliers must provide their workers access to an effective and confidential grievance mechanism to obtain feedback on violations against practices and conditions covered by this Code and to foster continuous improvement. Suppliers must ensure that they have an effective mechanism in place to allow workers to report a breach of any of the above without fear of reprisal.

## d. Diversity, inclusion and non-discrimination

Suppliers must ensure that there is no discrimination in hiring, treatment, compensation, access to training, promotion, termination or retirement based on sex, sexual orientation, marital or civil status, gender identity and expression, race, religion, colour, nationality, ethnic or national origin, disability, or age. Suppliers must promote an inclusive work environment that values the diversity of its employees.

The Supplier shall be committed to equal opportunities and not discriminate or tolerate discrimination or harassment with respect to gender, ethnic and national origin, race, colour, religion, age, disability, sexual orientation and identity, or any other characteristic protected by law.

## e. Sexual harassment

Wickes takes a zero tolerance approach to any instance of sexual harassment, which includes unwanted conduct of a sexual nature which has the effect of violating a person's dignity or creating an intimidating, degrading or offensive environment for them. Wickes has a duty to take reasonable steps to prevent sexual harassment and expects its suppliers to do the same. Suppliers must not permit or tolerate any form of sexual harassment, whether in respect of their own employees, Wickes colleagues or others in their supply chain, and must take immediate steps to investigate and take action if any evidence or allegation of sexual harassment is suspected.

## f. Conflict minerals

Where relevant, Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of cobalt, tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a manner consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

# 2. Safety and wellbeing

Wickes is committed to ensuring the health, safety and wellbeing of our colleagues and customers. Safety is at the heart of everything we do at Wickes and as a supplier partner we ask that you help us maintain safety as our number one priority throughout the supply chain, including third parties working on your behalf for us. The Wickes Safety Policy Statement provides more information on our commitments and approach. Our Suppliers must comply with all applicable health and safety laws and regulations in the countries in which they operate, as well as those laws which apply in the locations where the relevant materials, goods and/or services are provided.

Our Suppliers must have effective systems to identify and manage safety risks associated with their own operations, and ensure there are adequate measures to monitor and measure compliance. Their safety Policy and arrangements must be documented and provided when requested.



## a. A healthy and safe workplace

Suppliers should ensure access to clean, safe and reasonable working conditions. This includes providing workers with reasonable access to clean toilet facilities and drinking water. If Suppliers provide a canteen, they must include sanitary food preparation, storage, and eating facilities in line with local laws and regulations. If Suppliers provide residential facilities for their workers, they must provide clean and safe accommodation equipped with fire alarms, hot water for bathing, adequate lighting, heat and ventilation, reasonable personal space along with reasonable entry and exit privileges. If the worker has to pay the Supplier costs for the use of residential facilities, these costs and deposits must be reasonable and transparent.

## b. Risk Assessment

Suppliers must ensure that the risks to the safety of their workers or anyone else who may be impacted are considered and controlled effectively. They must not tolerate any immediate threat to workers' safety and be firmly committed to sending everyone home safe and well every day. We expect our Suppliers to follow this ethos by monitoring potential exposure to health and safety hazards for workers, including chemical, electrical and other energy sources, fire, vehicles, and fall hazards. These are to be identified, assessed and mitigated using preventative maintenance and safe work procedures and providing ongoing occupational health and safety training.

## c. Machinery and equipment

Suppliers must ensure the suitable and sufficient provision of safe machinery and equipment in order to conduct their activities. They must regularly evaluate production and other machinery for safety hazards. Guards, interlocks, and barriers must be provided and properly maintained where machinery presents an injury hazard to workers. Suppliers are responsible for providing certificates to meet regulatory requirements.

## d. Training and instruction

Adequate information, instruction and training must be provided to ensure workers have the relevant knowledge, ability, and experience for the role they are carrying out. Suppliers must maintain records documenting any workplace safety training.

## e. Competent person

Our suppliers must ensure they have access to competent safety advice to support them with compliance with this Policy.

## f. Reporting

Suppliers must maintain records documenting any workplace injury and illnesses and implement procedures that encourage worker reporting.



# 3. Environmental responsibility and community engagement

Wickes is committed to support the fight against climate change, and take action to protect the natural environment, both in our own operations and in our wider value chain. We expect our Suppliers to also actively work towards minimising and mitigating their associated impacts on the natural environment. The Wickes Environment Policy provides more information on our commitments and approach. We empower and support our colleagues to give back to our local communities, and invite our Suppliers to support us where they can.



## a. Environmental management

Suppliers must comply with all applicable environmental legislation and local regulations, and continuously monitor and manage all production processes including raw materials procurement, chemicals handling, emissions, discharges, and disposal of hazardous waste to minimise negative impacts on the environment and prevent pollution.

## b. Environmental permits and reporting

Suppliers shall ensure that all required environmental permits (e.g. for discharges to air, water and land and waste management activities), approvals, and registrations are obtained, maintained and retained for the required period of time, kept current and operational and reporting requirements are met.

## c. Greenhouse gas emissions

Suppliers must commit to mitigating climate change by reducing their direct greenhouse gas emissions and emissions from the goods, materials or services they provide. Wickes expects all Suppliers, when requested, to support and facilitate our Greenhouse Gas Reporting requirements, by providing all relevant greenhouse gas emissions data, not limited to scope 1 and 2 emissions.

## d. Resource use and waste management

Suppliers must commit to reducing negative environmental impacts from their operations and from the goods, materials or services they provide.

Wickes expects all Suppliers to minimise the use of energy and water throughout their operations, and reduce the amount of raw materials required. Any extraction of natural materials must be carried out with care and consideration for local communities and the environment.

Wickes expects Suppliers to adopt circular economy principles to reduce waste in their direct operations and from products and packaging supplied. Our products and packaging should be simple and easy for our customers to recycle. Refer to the Wickes Packaging Materials Policy for more information.

## e. Nature and water stewardship

Suppliers must commit to only source timber products and any other commodities that could risk deforestation (e.g. leather, rubber and palm oil) from legal and sustainable sources that do not cause deforestation or degradation. Wickes expects all Suppliers, when requested, to support and facilitate our reporting requirements, by providing all relevant product data. Refer to the Wickes Timber Sourcing Policy for more information.

Where appropriate, Suppliers shall implement a water management program that documents, characterises, and monitors water sources, use and discharge; and controls channels of contamination. Suppliers shall conduct routine monitoring of the performance of their wastewater treatment and containment.

## f. Restricted chemicals

Where relevant, Suppliers shall take steps to reduce the use of any restricted substances or Substances of Very High Concern (SVHCs) with suitable alternatives in all products supplied to Wickes. Wickes expects all Suppliers, when requested, to support and facilitate our reporting requirements, by providing all relevant product data.

## g. Community engagement

As a supplier to Wickes, we may ask you to support our corporate charity fundraising events and/or our community programme. We donate our products to local good causes in our local community to support them with building and outdoor improvement projects. Refer to the Wickes Charity and Community Policy for more information.

# 4. Business integrity and ethics

Wickes is committed to conducting business in an honest and ethical way, acting responsibly with professionalism, fairness and integrity at all times and in all supplier relationships. We expect our suppliers to adopt the same approach and to uphold the same ethical standards throughout their own businesses. Suppliers must provide a whistleblowing service to ensure that their employees can report any concerns.



## a. Conflicts of interest

Suppliers must ensure that any perceived or actual conflicts of interest are reported before the commencement of any supply of goods or services, or as soon as the conflict arises. Decision making by any Supplier must not be influenced by personal interests.

## b. Fraud

We take a zero tolerance approach to any activity which either amounts to fraud or is dishonest in any way. Suppliers must ensure they comply with all applicable fraud laws and regulations in the countries where they operate and put in place effective policies, training and controls to minimise the risk.

## c. Tax evasion and money laundering

Suppliers must ensure they comply with all applicable tax and money laundering laws and regulations in the countries where they operate and put in place effective policies, training, processes and controls to minimise the risk of tax evasion and money laundering or its facilitation.

## d. Anti-bribery and corruption

We have a zero-tolerance approach to any form of bribery and corruption in our business and supply chain. All Suppliers are expected to abide by applicable anti-bribery and corruption laws and regulations and to have appropriate policies,

processes and training in place to ensure that they and their employees, agents, contractors and representatives are not involved or implicated in bribery or other corrupt practices. Suppliers must work collaboratively to identify and address any instance of bribery and corruption in their supply chain, should it arise.

## e. Gifts and hospitality

We acknowledge that the giving and receiving of hospitality can be an important part of building and maintaining relationships with our Suppliers. At Wickes, we have a gifts and hospitality policy to ensure we have an open and transparent approach and to mitigate any risk of bribery and corruption or improper conduct. Our policy does not allow colleagues to accept gifts from suppliers. Any gifts that are sent to Wickes will be used in fundraising activities for our charity partners.

## f. Competition law

Suppliers must avoid practices that could be viewed as anti-competitive and compete fairly and ethically, ensuring compliance with all applicable competition laws and regulations relevant to their operations.

## g. Sanctions and export control

Suppliers must conduct business in a manner that is compliant with export control, trade and financial sanctions laws, regulations and procedures applicable to their business operations,

ensuring their supply chain also adheres to these requirements.

## h. Data privacy, cyber security and confidential information

Suppliers must adhere to all applicable data protection laws and regulations and implement appropriate technical and organisational measures to safeguard the personal data of customers, consumers, employees and shareholders. This includes keeping data confidential and preventing unauthorised access, modification or disclosure of personal data or confidential information.

Suppliers should have a cybersecurity program in place, with defined policies and processes to respond to any security incidents or breaches and safeguard the confidentiality, integrity and security of both their own data and systems and any Wickes data and systems they are authorised to access, complying with any required standards applicable to their business. Any data or cyber incidents that affect or have the potential to affect Wickes must be reported immediately to [GDPR@wickes.co.uk](mailto:GDPR@wickes.co.uk).

As part of their day-to-day business with Wickes, Suppliers may need access to confidential information. Suppliers must ensure this information is protected and remains confidential, disclosing it only with written permission from Wickes, or in accordance with contractual confidentiality provisions.

## i. Intellectual property

Suppliers must respect and safeguard Wickes' intellectual property rights, which includes technology, designs, processes, know-how, trade secrets, copyright and trademarks. Any use of Wickes's intellectual property requires prior written consent from Wickes.

# 5. Management processes and systems

Wickes expects all Suppliers to have implemented effective systems, processes and controls that ensure their operations, goods and services (as applicable) comply with all relevant guidance, laws and regulations, including this Code.



## a. Record keeping

Suppliers are required to keep and maintain complete and accurate records to demonstrate transparency and compliance with the standards detailed in this Code.

## b. Risk management

Suppliers must set up effective systems to identify and manage risks associated with their own operations and supply chain, including legal compliance, environmental, health and safety, labour practices and ethics.

Wickes expects all Suppliers to have robust and tested business continuity planning arrangements in place, including crisis management plans to ensure the continuity of or the quick and efficient resumption of services to Wickes in the event of an unforeseen disruption to their operations.

Suppliers are also required to identify and plan for emergency situations applicable to their operation, including training relevant workers and carrying out regular drills. e.g. worker notification and evacuation procedures.

## c. Reporting

Wickes may, from time to time, request documents or information as evidence of compliance with this Code and/or to support Wickes to comply with our own regulatory or reporting requirements. Suppliers shall disclose such information requested as soon as reasonably practicable.

## d. Investigations

Suppliers must have processes in place to conduct open and transparent investigations in relation to any incident or allegation that arises in connection with a Supplier's relationship with Wickes. Suppliers shall be required to share the output of any investigation and work with Wickes and work collaboratively to identify any opportunities for improvement.

## e. Audits and assessments

Suppliers are expected to carry out periodic self-evaluations to ensure adherence to legal and regulatory requirements, the content of this Code and any related contractual requirements.

In addition, Wickes has its own Supplier Online Risk Assessment ("SORA") programme which reviews a supplier's performance against the contents of this Code, legal and regulatory requirements and any other contractual requirements. Failure to respond to a SORA request in a timely manner or to provide information may result in follow up action including the termination of the relationship with us.

We expect Suppliers to carry out assessments in their own supply chain to ensure these standards are consistently monitored and enforced.

## f. Subcontracting

Suppliers must declare to their Wickes contact any subcontracting in their supply chain which is permitted under the terms of their supplier contract. The Supplier shall remain liable for the conduct or

omission of any subcontractor and must ensure that they are made aware of this Code and agree to adhere to the provisions contained within.

Suppliers are expected to hold their subcontractors, agents, employees and representatives to the standards detailed in this Code. Wickes recognises that Suppliers in deeper tiers of the supply chain may take longer to align with these standards. We are committed to working with Suppliers to help them implement this Code within their supply chain.

## Contacting us

If you have any questions or concerns, please contact your Wickes contract manager in the first instance or if more appropriate, a member of the Wickes Legal team. To report serious concerns, any supplier can do this anonymously via our Whistleblowing Helpline on 0800 949 6396 or make a report via our Whistleblowing portal.