



Modern Slavery Transparency Statement

This statement has been produced in accordance with the Modern Slavery Act 2015. It constitutes our Modern Slavery Transparency Statement for Wickes Group plc and its relevant subsidiaries¹ for the financial year ending 31 December 2022. Wickes Group plc and its subsidiary companies are referred to as the "Wickes Group" or "The Group" throughout this statement.

Introduction

The Wickes Group is opposed to all forms of unethical business behaviour. We recognise the harmful impact that Modern Slavery has on individuals and society and we are committed to help prevent these illegal practices.

Modern Slavery is an important component of our Responsible Business Strategy (Directors' Report page 116, 2022 Annual Report). Our customers, suppliers, investors, colleagues and communities expect us to manage this risk and protect the rights and welfare of workers within our own business and our supply chains.

Our businesses and our supply chains

We are a digitally-led, service-enabled home improvement retailer, offering choice, convenience, value and best-in-class service to customers across the UK. We fulfil all of this through a low-cost, efficient and integrated operating model, as well as an international supply chain, that works to source responsibly and ethically.

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 UK Modern Slavery Act 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 legislation.

Policies and control on Modern Slavery

The Wickes Group is committed to doing the right thing. We have put a governance framework in place to manage all material focus areas within our business, including Modern Slavery.

We have a Modern Slavery and Human Trafficking policy, approved by the Wickes Group Executive Board, which details the Wickes commitments to prevent slavery and trafficking risks from occurring either in our own business or our supply chains. The Group's policy commitments on Modern Slavery and Human Trafficking are:

- 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 service for employees and suppliers to anonymously report any concerns.
- We comply with all employment and human rights laws.

¹ For 2022, this included all relevant, active subsidiary companies according to the requirements of the Modern Slavery Act 2015: Wickes Group plc and Wickes Building Supplies Limited.

The Modern Slavery and Human Trafficking policy is supported by other policies including our Responsible Sourcing policy, Human Rights Policy, Equal Opportunities Policy and Whistleblowing Policy.

Responsibility for compliance with our policies sits with all colleagues and this is supported through training. Subject matter leads, including representatives from the Legal, Commercial and HR teams, are together responsible for developing our Anti-slavery and Human Trafficking policies and controls. Our Group Board and the Responsible Business Committee monitor performance and support continued improvement.

The Supplier Commitments (which set out our expectations) have been communicated to our suppliers and incorporated into our supplier manual and/or our terms of business. The supplier due diligence process, described in the following section, includes an assessment against the requirements of our Supplier Commitments.

Regarding our own employees, we uphold high standards, operate in line with our policies and comply fully with the relevant employment laws and Right to Work checks. We have clear standards of conduct which are included in our Code of Business Ethics.

Our Code of Business Ethics includes a specific section on Modern Slavery, including the red flags for colleagues to be aware of. Our employees and suppliers have access to a whistleblowing service and are encouraged to report any concerns. No reports were registered via the whistleblowing service in 2022 relating to modern slavery.

The employee due diligence process, described in the following section, includes checks both across our direct employee population and any temporary employees recruited via agencies.

We conduct additional due diligence to identify red flags of Modern Slavery across our business and undertake audits on areas we identify as higher risk.

Risk assessment

Our subject matter leads carry out an annual risk assessment to assess our performance against our minimum standard control framework for modern slavery and identify areas for improvement.

Our supplier risk assessment and due diligence procedures detail our requirements around social and environmental behaviours in our supply chain. Specific guidance is provided on modern slavery.

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

All suppliers are profiled to identify if they are a risk to our business. This includes:

- Checks on the country in which the supplier operates or trades in, to identify those in countries with a higher risk of corruption. This is assessed using the World Governance Indicators for corruption, the Transparency International Corruption Perceptions Index and the Global Slavery Index.
- Checks on the 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.
- Checks on the 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).

Due diligence within our supply chains

Our responsible sourcing and quality team are responsible for managing modern slavery due diligence within our supply chain. We continue to be members of SEDEX and our preferred methodology is SMETA through recognised third party audit bodies.

We have several Wickes supply chain commitments identified in our supplier manual that we expect all suppliers to adhere to. We require our Goods For Resale (GFR) suppliers to complete an online risk assessment on a 2 year basis to identify any key risks within our supply base. Where identified as high risk during our risk assessment process, we also follow the same process for our Goods Not For Resale (GNFR) suppliers.

We ensure that simple practices are in place with our suppliers and their supply chains to identify potential modern slavery concerns. In addition, where we manufacture products under the Wickes brand, any factories and manufacturers undergo a SMETA or equivalent ethical audit on a 2 year basis.

Following the delays caused by the COVID pandemic, we resumed assessments on factories in person from November 2022 and via our third party audit bodies. We have also adapted new ways of working to digitally assess factories. We will have a prioritised schedule based on risk for in person audits for completion in 2023.

99.8% of our timber purchased by the Group in 2022 was certified as responsibly sourced by FSC, PEFC. Both the FSC and PEFC certification schemes require compliance with the ILO Declaration on Fundamental Principles and Rights at Work, 1998, prohibiting the use of forced or child labour.

Due diligence within our own business

Direct recruitment adheres to regulatory requirements relating to Right to Work checks. Internal Audit periodically reviews the processes and controls that ensure compliance with employment law, including an assessment of Right to Work checks.

Recruitment of agency workers into the Group is also assessed and due diligence is undertaken according to the identified risk-level. All agencies used by the Group's distribution centres, which employ a high level of manual labour, undergo comprehensive checks. A contract must be in place which details our expectations around their own due diligence to prevent Modern Slavery. The agency must provide a 'sign off sheet' for each agency worker coming to our sites, including their name and photograph. The agency workers must bring their identification documents on their first day so that our business can check them against the sign off sheets. This ensures that the worker we are expecting has arrived at site but also, crucially, that the worker has access to their own documents, as confiscation of ID is a common trait within gang control of victims.

Issue response

We have an issue response plan which details how the business will deal with any incidences of Modern Slavery identified within our own business or our supply chains. This is supported by a workers' questionnaire. This details how we will support the victims as well as how we will manage the investigation and, in the case of suppliers, pause trade but also support them to mitigate the identified risks.

Training

We have a Code of Business Ethics, which includes a section on Modern Slavery and details the red flags for colleagues to keep an eye out for. The Code of Business Ethics is available to all colleagues through our colleague communication platform, and is complemented by a Modern Slavery training module completed by all colleagues. We provide face-to-face training for colleague populations which have more direct exposure to and control of Modern Slavery risk, including key operational roles such as Distribution Centre colleagues.

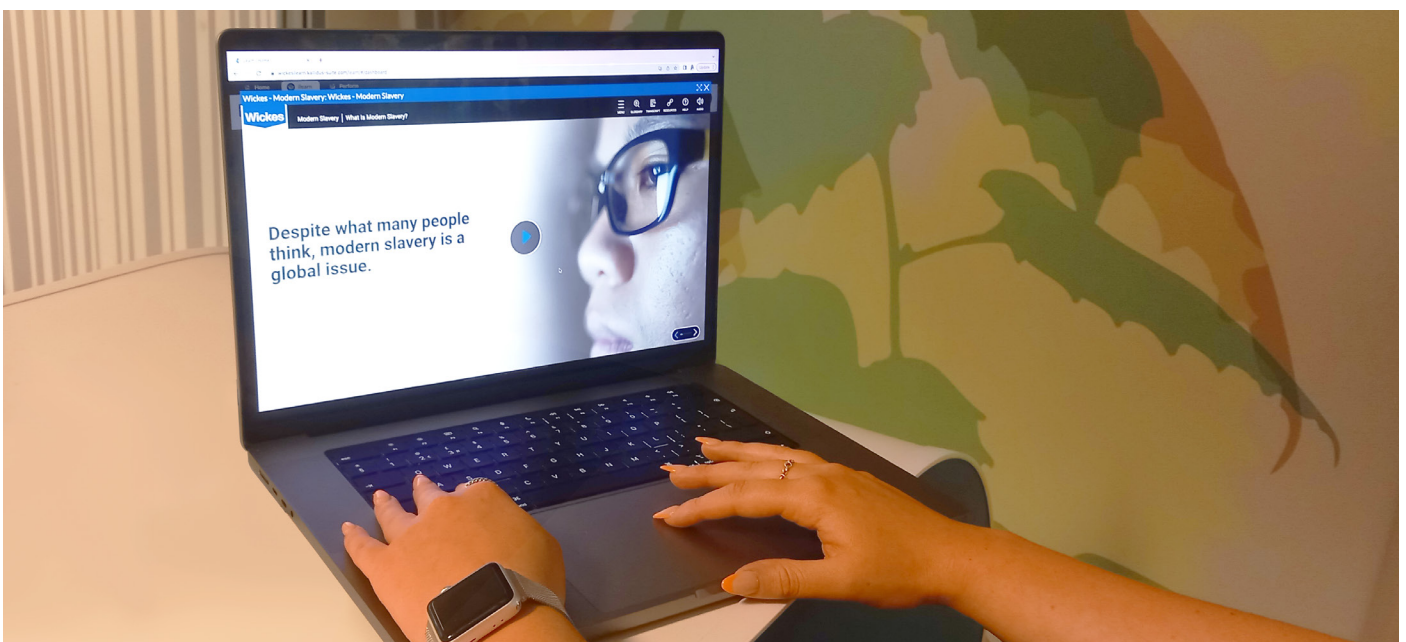
Performance

We monitor training completion rates as a KPI for Anti-slavery performance. We also track whether there have been any reported incidents of Modern Slavery during the year. Our 2022 training completion rate for our online training was 89%. However this number is not adjusted for colleagues that left the business who did not complete the training, and also colleagues in our distribution centres who completed the in person training, rather than online.

In 2022 a total of [612] Distribution colleagues were asked to attend in person training on Modern Slavery, with an attendance rate of [95]%. This results in our total completion rate for training at [96.8]%.

Identified incidents

No incidents of Modern Slavery were identified in our own business or our supply chains during 2022.



Progress in 2022

We have continued to improve our risk management and due diligence processes throughout the year, as well as additional progress set out below:

- During 2022 we relaunched our Whistleblowing service to colleagues with updated posters and communications to publicise the service, which included a new mobile reporting function. We also extended our Whistleblowing service to suppliers by including the details on our supplier portal.
- We have established a Human Rights policy, which was approved by the Group Executive Board in October 2022. This further supports our other recruitment policies to protect against Modern Slavery.
- A workers questionnaire was developed by the HR team to send out to any individual who had been identified as part of our modern slavery monitoring activities.
- We have added the Supplier Commitments into our terms of business for all new GNFR contracts.
- We reviewed and updated our online Modern Slavery training module to ensure that it remained focused and relevant.

Focus for 2023

- We are intending to implement specialist training for our HR business partners on carrying out interviews with colleagues where red flags have been identified from Modern Slavery monitoring activities.
- We are planning to move to a digital verification service for our Right to Work Checks which will reduce the compliance risk further and any risk of fake identification being presented or invalid right to work checks.
- We will review our Supplier Online Risk Assessment to update for any changes required and send out to all GFR Suppliers and any new GNFR Suppliers.
- We will continue to review our current policies, controls and training to ensure they are appropriately embedded within the business.

This statement was approved by the Wickes Group PLC Board on Tuesday 23 May 2023 in relation to the financial period ending 31 December 2022.



David Wood
Chief Executive Officer
Wickes Group Plc
23 May 2023