

## **Statement on Compliance with the Modern Slavery Statement for Financial Year ending 31 December 2024**

Wincanton and its trading subsidiaries, remain committed to the highest possible ethical standards and corporate conduct and we continue to expect our suppliers to adhere to these same standards. The Group has a zero-tolerance approach to modern slavery and human trafficking and requires companies across our extended supply chain to understand and meet our expectations on anti-bribery, corruption, legal compliance and ethical conduct.

To this end, the following statement is offered in compliance with the Modern Slavery Act 2015 and sets out the Group's approach to the prohibition of any form of forced labour or slavery within our supply chain.

### **Our values**

Wincanton operates with strong corporate values and behaviours.

Our behaviours are underpinned by a set of corporate policies supporting our commitment to high ethical standards and doing business with integrity. Our adherence to these policies is subject to regular reviews, helping us to continuously improve in this area.

- A Modern Slavery policy: This policy reinforces our commitment to ensuring there are no instances of forced labour, slavery or human trafficking in our business or supply chain and helping our people to identify these practices;
- The Wincanton Code of Supplier Responsibility: We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the Code of Supplier Responsibility could lead to the termination of the business relationship.
- A Speaking up (Whistleblowing) Policy: We encourage all our workers, customers and other business partners to report any concerns related to the direct activities of our organisation and its supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our Speaking up procedure is designed to make it easy for workers to make disclosures, without fear of retaliation; and
- Our Code of Conduct: This explains our ethical standards as an organisation and how we expect our employees and suppliers to act and is widely promoted through our operations.

In addition, our Code of Conduct sets out the following:

- We expect our suppliers and partners employees and their respective supply chains to operate to the highest standards of safety, quality, inclusion, integrity, sustainability and ethical conduct;
- When seeking new suppliers and partners we select those whose values and commitment to ethical business conduct and a sustainable future match our own, and we use objective processes and due diligence to ensure this;
- We are opposed to the use of any form of child labour or practices which inhibit the development of children and are opposed to any employment that is not freely chosen;

- We commit to refrain from using any form of labour that could be described as 'modern slavery' and expect the same from all those we work with; and
- The induction process that all employees, including drivers and warehouse operatives attend, ensures that our workforce is aware of the content of these policies and the associated obligations and responsibilities.

We have also developed a set of Key Performance Indicators (KPIs) by which to measure our progress in this area. These are:

**Supplier engagement:**

- Percentage of suppliers to have completed modern slavery checks via the Achilles onboarding process.

**Modern Slavery Training:**

- Number of new and relevant colleagues, and contractors, identified via MyLearning, to complete mandatory Modern Slavery training.
- Percentage of managers and IT users to complete annual Modern Slavery training.

**Due Diligence:**

- Number of matching addresses (multiple occupancy) and bank details (gangmaster risk) identified within HR and payroll systems.

**Business Policy:**

- Number of Wincanton sites which have access to educational materials from Stronger Together.

**Our workforce and our supply chain**

Most of our Group employees are UK-based managerial or office staff, drivers and warehouse operatives, and are paid at least the National Living Wage. We believe there is a low risk of human slavery or forced labour in our direct workforce.

The risk may be more significant in our supply chain and we have therefore focused on enhancing our approach in relation to our supply chain as noted below.

**Progress we have made**

Since we published our Modern Slavery Act Statement last year, we have:

- Conducted the annual refresh of our Modern Slavery policy and published this on our website;
- Implemented an updated Modern Slavery training module;
- Started to collect data on the KPIs against which we will measure our progress in relation to reducing risk of Modern Slavery within our supply chain;
- Continued to enhance our supplier onboarding process to incorporate greater scrutiny in relation to commitments made regarding prevention of slavery and human trafficking; and
- Continued our programme of assurance reporting and audits to assess compliance by third party agencies with their commitments to preventing modern slavery and human trafficking.

We will continue to review our policies and practices in line with our commitment to safeguarding against modern slavery and human trafficking in our business and our supply chain.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Directors on 24 February 2025.

**Lyn Colloff**  
**Company Secretary**

Wincanton Limited  
Registered in England and Wales No. 04178808