



Wincanton

At the heart of British supply chains

Our Code of Conduct

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Our Code of Conduct

Wincanton is a leading supply chain partner for British business, providing supply chain solutions up and down the country with colleagues working across more than 160+ sites. We put our customers at the heart of everything we do. We want to be the best performing and most trusted supply chain partner that they have.

Our Code of Conduct is a key component of the Wincanton Way, our broader ESG programme.

Our Code sets out what we stand for as a company. It is underpinned by a corporate governance structure and a robust risk, controls, and compliance programme. Adhering to the code helps our colleagues to make the right choices and demonstrate the highest standards of integrity and ethical behaviour, in everything that we do.

Our comprehensive framework of policies and standards is applied across Wincanton regardless of where we work or what level we are. It is important that we each take the time to understand and adopt the code of conduct that is the Wincanton Way: believe it, live by it, and promote its principles to others.

It will help us to have the confidence to contribute fully; to make the right decisions in difficult situations; and to safely speak up and raise concerns when we suspect poor

or unethical decisions may be being made by others.

The Wincanton way of doing things is built on our values of excellence, integrity, passion, proactivity, togetherness and trust.

To maintain and grow our reputation, we have a responsibility both as a group and as individuals to act positively to achieve our company and personal goals and to always maintain the highest standards of behaviour and achievement.

People want to be recognised for doing an amazing job both collectively and individually and we all want to help make Wincanton a company of which we are proud. The code helps us do just that. Our code will help us deliver a sustainable and successful future for our business and together we will be the most innovative, effective and respected logistics company.

A handwritten signature in black ink that reads "James Wroath".

James Wroath
Chief Executive Officer

The Wincanton logo, featuring the word "Wincanton" in a white, bold, sans-serif font, set against a background of several parallel, dark, cylindrical metal rods that recede into the distance.

Great people
delivering
sustainable
supply chain
value

Our Code of Conduct

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Our Code of Conduct

Created by our employees, our values express how we work with colleagues and customers. Every person at Wincanton, from boardroom to warehouse floor, lives these values every day.

Our values



Excellence

We are the best at what we do



Integrity

We do the right thing



Passion

We love what we do



Proactivity

We are one step ahead



Togetherness

We are better together



Trust

We do what we say we will

Our principles

We are inclusive. We trust and respect individuals, achieving our common goals together.

We work with uncompromising integrity, and raise any concerns we have about compliance with this code, our policies or the law.

We deliver a high level of achievement and contribution.

We encourage proactivity, innovation and personal development.

We have a responsible, long term perspective.



In short

By adopting the Wincanton Way and the values and principles that underpin it, we support our purpose 'Great people delivering sustainable supply chain solutions'..

Together we will build the most innovative, effective and respected logistics company, grow as a result and become the aspirational place to work and build a career.

1.1 What is it for?

The Wincanton Way is our **commitment** to how we work and our **recipe for success** in becoming the UK's most **innovative, effective and respected** logistics company.

Combining **expectations, principles and aspirations**, the Wincanton Way clearly sets out how we work and how our values support us in connecting and delivering with our colleagues, customers, communities and suppliers.

The Wincanton Way acts as a **compass**, making sure we're always heading in the right direction, remaining **performance-focused and productive**, whilst doing the right thing and being legally compliant in everything we do.

We are clear that we expect our colleagues, partners and suppliers to **follow the Wincanton Way** at all times, making us a company that people **aspire** to work for and with.

1.2 Who does it apply to?

The Wincanton Way applies to everyone who works for or represents Wincanton:

- Our directors, officers and colleagues
- Those we choose to work with and those who aspire to work with us

Wincanton colleagues managing third parties such as suppliers, consultants, contractors and sub-contractors should expect them to adhere to the Wincanton Way and provide the appropriate information and training to enable them to do so.

Appropriate action should be taken if a third party is shown not to have complied with the Wincanton Way. This may include termination of contract or project withdrawal.



1.3 What we expect of our colleagues

Be familiar with the Wincanton Way and the associated detailed policies relevant to your responsibilities and adhere to them.

Keep up to date with changes in your industry sector or in the regulatory landscape that might affect Wincanton's legal compliance, ethical position or market reputation.

Raise any concerns you may have about our current or proposed activities as promptly as you can and in the appropriate way.

Participate fully in any investigation of potential non-compliance.

Upholding the Wincanton Way is an explicit expectation of all our colleagues and leaders. Those who do not do so may face investigation and disciplinary action up to and including termination of employment.

Although we try to focus on the positive actions the Wincanton Way fosters, there will occasionally be times when negative behaviours must be addressed. In these circumstances we will have zero tolerance of:

- Condoning unsafe working practices
- Breaking the law or encouraging others to do so
- Discrimination on any grounds
- Bullying and harassment
- Violence and aggression
- Bribery and corruption
- Fraudulent activity
- Retaliation against those who speak up and do the right thing
- Misuse of Wincanton data or IT systems.



Be aware, be accountable, be responsible

1.4 What we expect of our leaders

Our leaders are responsible for the performance and productivity of their organisation and the delivery of their business objectives.

Our leaders are held accountable for creating an environment which allows the Wincanton Way to flourish, which monitors how well we are following it, and which deals appropriately with any instances of potential non-compliance.

Leaders should ensure that colleagues and partners feel accountable for our legal and ethical performance and for working in a way that embodies our values. Business results should never be put ahead of policy compliance and ethical conduct.

Leaders must set the example and act and talk with integrity always, recognising that they are the local embodiment of the Wincanton Way.

If you lead a team or manage partners, you must ensure they are all

familiar with the Wincanton Way and provide them with the support and advice required to apply it and uphold its intent.

Colleagues should be supported to safely and constructively question how things are being done and raise any concerns about whether the Wincanton Way is being followed.

Leaders should measure and monitor compliance with the Wincanton Way and establish control measures as necessary.

Any concerns raised should be documented and acted on promptly and appropriately with corrective and disciplinary action taken as necessary.

Colleagues and partners should be recognised for acting with exemplary integrity and adherence to the Wincanton Way.

Our leaders set the example, act with integrity and provide support



1.5 Speaking up

If you encounter a problem with a colleague or situation, you should try to resolve the matter constructively with those involved. If this is not possible, you should speak to your line manager or local People manager.

If it is not possible to talk to any of the above, please follow the Speaking Up Policy which provides a confidential way to raise concerns about activities that you consider to be outside the Wincanton Way.

Speaking up is the right thing to do. We want to know about your concerns so we can do something about them and make Wincanton a better place to work and thrive.

Speaking up is the right thing to do



1.6 Following the Wincanton Way

It is important that we all understand the Wincanton Way and consciously use it every day, particularly if we are faced with difficult situations.

If you ever find yourself in a situation which 'doesn't feel right' or where it is hard to know what to do, refer to the Wincanton Way and ask yourself:

Will it amaze the customer and benefit their business?

- Will it make our business better?
- Is it the right and best use of our assets or information?
- Would I be happy to take credit for this decision?

How would I feel about myself afterwards? What would my family and friends think?

How would this action look if it was reported in the media?

- Will this action put myself, my colleagues, the public or the environment at increased risk of harm?
- Is it legal? Is it right? Is it fair? Does it align with our values?
- Am I or a colleague favouring one person over another without merit or evidence? Am I exhibiting conscious or unconscious bias?
- Am I calling out behaviour that is not aligned with the Wincanton Way and making my position clear in a constructive way?



2.1 Getting into the detail

While we believe the Wincanton Way is a model for the exemplary business we aim to be, there are some specific areas where further detail is required to help us identify opportunities or navigate risks successfully.

The following guidance underpins the Wincanton Way and provides links to some of the relevant policies or external resources that may further assist colleagues in challenging situations.



3.1 Health and safety (H&S)

- At every level of our business, we are committed to the health, safety and welfare of our colleagues and others
- We deliver safety first
- We have robust systems and processes to comply with statutory requirements, and the attitudes and behaviour of our colleagues drive improvement in health and safety
- We will not tolerate anyone condoning unsafe behaviour or working practices.



You must:

- Make sure that you understand the H&S requirements of your job and get help from the H&S team if you need it
- Always follow our safe systems of work and meet our H&S Policy and standards
- Stop work if you think it is unsafe to continue
- Make sure you have the right H&S training required for your job
- Using the correct recognised processes, challenge colleagues if you think that an action or decision is unsafe and might result in increased risk of harm to colleagues or others
- Immediately report H&S incidents, including near misses and unsafe acts, omissions or conditions
- Speak up if you think that actions or decisions may result in an increased risk of harm or breach of our H&S Policy or procedures.



Subject matter owner:

Health and Safety Director
and H&S Team

Relevant Wincanton
Policies:

As described in the Health
and Safety Manual

Things to watch out for:

Follow our H&S Principles
and adopt the STAR values,
'Stop, Think, Assess, React'



3.2 The environment

- We are committed to the protection of our environment and the sustainable use of resources
- We have robust systems and processes to comply with statutory requirements, and the attitudes and behaviour of our colleagues drive improvement in reducing our environmental impact
- We will not condone behaviour or working practices that put the natural environment at increased risk of harm.



You must:

- Make sure that you understand the environmental requirements of your job and get help from the environment team if you need it
- Always work within our Environment Policy, standards and systems
- Stop work if you think it will potentially cause avoidable, uncontrolled pollution
- Make sure you have the right environmental training required for your job
- Challenge colleagues if you think that an action or decision might result in increased harm to the environment
- Report environmental incidents, including near misses and environmentally unsustainable acts, omissions or conditions
- Speak up if you think that actions or decisions may result in harm to the environment or not meeting our environmental standards, policies or procedures.



Subject matter owner:

Head of Sustainability and CSR

Relevant Wincanton Policies:

As described in the Environment Manual and Environment Policy

Things to watch out for:

Follow our Environment Principles and adopt the STAR values, 'Stop, Think, Assess, React'

3.3 Equality, diversity and inclusion

Our commitment

Wincanton will:

1. Represent diversity and celebrate an inclusive workplace.
2. Ensure all colleagues have the opportunity to grow, develop and succeed.
3. Support local and national Diversity & Inclusion initiatives
4. Not tolerate any form of discrimination



Colleague expectation

As a Wincanton colleague,
I can expect:

1. To be treated fairly and without any discrimination.
2. A level playing field, in respect of career and development opportunities.
3. To have access to networks that enable and celebrate diversity.
4. To feel included, accepted and understood so that I can add my unique value.



Subject matter owner:

Chief People Officer

Relevant Wincanton Policies:

Equality, Fairness and Diversity policies

Things to watch out for:

Have you completed the on-line diversity and inclusion training?

3.4 Wellbeing

Wincanton will breakdown stereotypes and stigma, ensuring all colleagues feel valued, supported, included and safe.

We will:

1. Create a minimum standard framework supporting wellbeing and mental health
2. Foster a culture and environment of togetherness, kindness, openness and acceptance
3. Engage with national and international wellbeing awareness events.

Wincanton will empower all of us to look after ourselves and others.

We will:

1. Through clear and instantly recognisable branding, signpost a diverse range of topics
2. Provide safe accessible spaces to talk, receive support and guidance, welcoming all colleagues, in confidence
3. Leaders will engage with their teams on a regular basis with kindness, empathy, inclusion and a focus on wellbeing.

As a colleague I can expect:

1. That challenges in our wellbeing which can present themselves in many forms are recognised by my business
2. To be treated with compassion and support when we are experiencing poor mental health or other challenges in our life
3. To see clearly branded signposting
4. The business to provide trained mental health first aiders and offer support
5. To know that looking after each other makes a difference
6. If one of my colleagues wants to talk, I will listen with kindness, openness and acceptance
7. That in Wincanton nobody is alone.



Subject matter owner:

Chief People Officer

Relevant Wincanton
Policies:

Equality, Fairness and
Diversity Policies

Things to watch out for:

A small conversation about
mental health can make a
big difference
Wellbeing sharepoint
Mental health first aiders



3.5 Performance and reward

- We aim to reward our colleagues fairly and consider individual contributions to the performance of the business
- We set and assess objectives and performance goals fairly and consistently
- We regularly review the work of our colleagues and provide constructive performance feedback
- We invest in the education, training and skills development of our colleagues to improve the capability and capacity of our business.

You must:

- Perform your job to the best of your ability, responding to feedback constructively and participating fully in the company performance management process
- As a manager, evaluate the performance of your team fairly, objectively and consistently, providing regular specific, feedback
- As a manager, actively recognise excellence and address under-performance, supporting and promoting the development of your team.



Subject matter owner:

Director of Talent and Development

Relevant Wincanton Policies:

Performance Management, Development and Reward policies

Things to watch out for:

Do your job to the best of your ability and talk to your line manager first about development opportunities



3.6 Colleague engagement

- We expect collaboration and respect between our colleagues and encourage openness and honesty in our relationships
- We engage, include and involve our colleagues in business improvement and value their feedback and ideas, providing safe spaces for them to give it
- We respect the relevant processes and laws on collective representation and consultation and recognise that joining a trade union is an individual choice
- We endeavour to share information and discuss business and employment issues with our colleagues and their representatives
- We resolve disputes fairly.



You must:

- Accept accountability and responsibility for delivering the best results for our customers
- Ask for, provide and act on constructive feedback
- Be open with your colleagues and act with integrity
- As a manager, engage your team, make sure they know what's expected of them; what contribution they are making to our success and how your decisions and actions affect them
- As a manager make sure your team have the help and support they need.



Subject matter owner:

Chief People Officer

Relevant Wincanton Policies:

HR policies

Things to watch out for:

Always participate in our 'Your Pulse' colleague surveys - we can't make things even better without your input



4.1 Business reporting

- We always act within the law and the applicable professional standards
- We maintain complete and accurate records of our operational and commercial activity and business dealings, including all our expenditure and transactions with external organisations and individuals
- Our financial and business reports are prepared on time and present the information accurately and fully
- We maintain information, financial and operational controls and an effective system of risk management and compliance
- We are committed to the prevention of fraud and aim to detect and investigate any apparently fraudulent activity
- We pay the taxes, levies and tariffs applicable to our transactions and goods.

You must:

- Record all information and transactions of any aspect of the company's business, accurately, in a timely way and in accordance with the appropriate policies and procedures
- Preserve documents and records in accordance with the applicable legislation or policy
- Ensure all financial and other business controls are operated and evidenced where possible to demonstrate an appropriate audit trail
- Comply with our policies in relating to all tax matters and dealings with tax authorities
- Review and maintain your personal training and development needs to be able to fulfil your professional role
- Not compromise the integrity of our business records, reports, products or services or influence others to do so
- Not make a deliberately false or misleading entry in records and reports or falsify any corporate records
- Speak up regarding any suspicion of fraud to your line manager or follow the whistleblowing process.



Subject matter owner:

Group Financial Controller

Relevant Wincanton Policies:

Wincanton plc Finance Manual

Things to watch out for:

Ensure all business reporting, both financial and non-financial, is complete and accurate



4.2 Excellence, innovation and continuous improvement

- We recognise that a commitment to excellence and innovation is essential to customer satisfaction and business success
- We will provide tools, processes, support and training to develop ideas and implement best practice everywhere
- We will provide and promote standardised Wincanton media for communication areas ensuring consistency in look and feel across all sites
- We are committed to continuous improvement by inclusive collaboration across sectors, functions and regions
- We will encourage and support active participation in the sharing of ideas and great example case studies across all of our operations in a standard format for ease of use and understanding.

You must:

- Take responsibility for delivering an excellent service that meets our obligations and the expectations of our customers
- Adopt and embed Wincanton best practice in all of our processes
- Respond promptly by taking action to address any concerns about possible quality and service issues
- Actively participate in identifying ways to innovate and continuously improve our operations
- Ensure compliance in the use of the standardised media provided by the central operational excellence team.



Subject matter owner:

Implementation Director

Relevant Wincanton Policies:

Continuous Improvement policies

Things to watch out for:

Group Operations Community online site
Continuous Improvement Community
Operations Support Group
CI reporting mechanism



4.3 Protecting our assets

- Our service capability, intellectual property and commercially sensitive data and information are crucial business assets and we protect them from unauthorised disclosure and use
- We take individual responsibility for the care and proper use of our physical business and customer assets including computer systems, vehicles, facilities, Materials Handling Equipment (MHE) and other equipment
- We do not tolerate the use of our information systems or other physical assets to access, copy, store or transmit any information considered to be offensive, obscene or inappropriate.

You must:

- Only use our physical and information assets for business purposes, unless you have prior authorisation for other use
- Maintain assets carefully, guarding against damage, theft, waste and abuse
- Not seek personal gain from the use, sale or disposal of our business assets
- Value the company's time to fulfil the responsibilities of your job
- Not attempt to avoid IT security controls
- Keep all our documents and data protected, stored securely and on the correct system
- Not disclose our commercially sensitive information to third parties without authorisation
- Always seek guidance before giving information, opinions or views to third parties.
- Complete equipment and service testing documentation accurately, truthfully and objectively



Subject matter owner:

Chief Information Officer, IT
Security & Risk Manager or
Your Line Manager

Relevant Wincanton
Policies:

IT Acceptable Use Policy and
IT Security Policy

Things to watch out for:

Trust your instincts, if an
email or phone call feels
odd it probably is - report it

1.87	+1.82	2,205,110	3,681	561	0.05	0.42	0.00
14.3	-1.39	200	3	8,580	27.50	1.52	0.20
1.7	+0.50	5,600,200	9,409	2,224	50.50	1.54	1.50
4.72		100,100,000	18,968	19,542	560.50	1.88	0.00
0	0.00	0	0	0		47.71	
33	0.00	2,445,000	67,459	73,477	11.21	2.82	1.30
24.3	-2.02	3,450,000	85,206	25,200	142.91	1.80	0.00

4.4 Confidential information

- We will protect information in our possession that is confidential or proprietary to other parties, such as customers, suppliers and partners
- We will not attempt to obtain or use without authorisation the confidential or proprietary information of other parties
- We will ensure the compliance with all data and information policies covering virtual and hard copy data
- When working with customers such as defence companies where national security may be an issue, we will manage customer classified or proprietary information, materials and assets in accordance with the appropriate policies, processes and legislation.

You must:

- Avoid placing yourself or the company in the position of receiving other parties' confidential or proprietary information or assets when not authorised to do so
- Not acquire or duplicate documents or material unless authorised to do so
- Not seek access to classified materials from defence companies where access is not required for legitimate business purposes or if you are not authorised to do so
- Keep all documents and data entrusted to us by other parties protected and secure. Where national security may be a concern, classified information should be managed in accordance with the appropriate policies, processes and legislation
- Not disclose, either internally or externally, commercially sensitive information about a customer, competitor or partner, without their permission to do so
- Seek advice if you are unsure.



Subject matter owner:

Chief Information Officer, IT
Security & Risk Manager

Relevant Wincanton
Policies:

IT Acceptable Use Policy and
Document & Data Retention
& Destruction Policy

Things to watch out for:

If you think a piece of data
could harm the company or an
individual if it was disclosed
outside the Company, treat it
as confidential



4.5 Conflicts of interest

- We avoid any relationship, opportunity to influence or activity that will compromise our ability to make fair and objective business decisions
- If we think there is, or may be, a conflict of interest, we will notify the responsible manager
- We will not use any non-public information about any company for buying or selling shares or financial instruments for personal gain and we will not pass on such information to others.



You must:

- Disclose conflicts of interest in order that they may be managed and recorded
- Notify your manager of any personal or professional relationships that could cause a conflict of interest
- Not provide any services or information to a current or potential competitor without prior authorisation
- Not place business with a firm owned or controlled by a colleague of Wincanton or their family, without prior authorisation
- Disclose any circumstances where you may be hiring or supervising a family member, friend, or someone with whom you are personally involved
- Not have a substantial interest in a company which is, or may be a customer, supplier or competitor of Wincanton, without prior authorisation.
- Not use non-public information for personal gain, or pass such information to others, internally or externally, who do not have a legitimate need for the information.



Subject matter owner:

Company Secretary
Chief People Officer

Relevant Wincanton
Policies:

Conflict of Interest,
Personal Ties Policy and
Share Dealing Policy

Things to watch out for:

If you're uncomfortable, you
probably need to declare it
to your manager



4.6 Privacy

- We respect the personal privacy of our colleagues and others
- We collect and process personal information only in line with our company policies and the applicable legislation in order to meet necessary business needs and legal requirements
- We keep personal information secure to maintain the privacy of individuals
- We may periodically review and monitor messages, call records and other digital information for security and other business purposes in line with applicable legislation.



You must:

- Respect the privacy of colleagues and individuals whose personal information you may hold or process
- Only create, save, process, hold, disclose and transfer personal information in line with our data protection policies and applicable legislation
- Speak out if you have any concerns about how personal information is processed or managed by your team or other colleagues
- Not access, retain or disclose personal information to anyone internally or externally except in line with company policies and applicable legislation
- Speak to your Data Protection Officer if you are unsure.



Subject matter owner:

Data Protection Officer and the Data Protection Team

Relevant Wincanton Policies:

IT Acceptable Use Policy and Data Protection policies

Things to watch out for:

Guidance issued by the Data Protection Team



4.7 Media and communications

- Our reputation is a key asset and we always behave in a manner that maintains and reflects well on our brand
- Only those who have explicit permission to do so should act as a spokesperson for the company
- We sponsor activities that will meet commercial objectives and have a positive effect on the reputation of our business and its stakeholders
- We keep all our stakeholders well informed by providing information that they can access easily
- Marketing and Communications is responsible for the management of any official company presence, comments or opinions in the press or on social media and make sure that the information provided is accurate and not misleading.



You must:

- Always behave and act in a way that protects or enhances our reputation and brand when speaking about our business, colleagues or others, even when outside the workplace
- Not speak to the media or representatives of the investment community about our business without prior authorisation
- Not, as a colleague in Wincanton, use social media to post or display non-public information about the company and its stakeholders and/or that is threatening, intimidating, harassing, discriminatory, vulgar, obscene or libellous
- Not engage in social media forums for business purposes while acting for the company without prior authorisation from Marketing and Communications
- Not use any materials requiring customer approval without their prior authorisation.



Subject matter owner:

Marketing and Communications Team

Relevant Wincanton Policies:

Social Media Policy and the associated training materials

Things to watch out for:

If representing Wincanton, only use approved materials



5.1 Anti-bribery and corruption

- We comply with anti-bribery and corruption legislation and the Wincanton policies and procedures that prevent bribery and corruption.
- We do not offer, give or accept anything that can be perceived as, or has the effect of, unfairly or improperly influencing business decisions
- We aim to use our own colleagues to conduct our business. However, when having to use other parties, we will only appoint partners of known integrity and require that their conduct meets our standards, always.



You must:

- Only offer or accept gifts or hospitality acceptable under the relevant company policies
- Make sure that all partners are approved under the relevant company policies following due diligence, and that they work with Wincanton under a valid, approved contract
- Not make facilitation payments
- Make sure all sponsorships and donations are properly authorised.



Subject matter owner:

Company Secretary

Relevant Wincanton Policies:

Anti-Bribery & Corruption, incorporating Gifts & Hospitality

Things to watch out for:

If you are offered anything, don't accept without checking first



5.2 Competition

- We comply with competition and antitrust legislation
- We believe in open and fair competition
- We conduct business in an honest and straightforward way with integrity
- We do not use competitor information that we should not have
- We do not gather competitor information by illegal or unethical means.



You must:

- Not make formal or informal agreements with competitors which result in price fixing, bid collusion, market restriction or arrangements to limit supply
- Not agree to any restrictions on customers, partners or suppliers as to whom they can trade with and how
- Not share commercially sensitive information with competitors, which may include information concerning prices, bids, sales contracts, costs, margins and operational data
- Speak up regarding suspicions or allegations of anti-competitive behaviour
- Always seek advice or guidance if you are unsure.



Subject matter owner:

Sales Directors and
Customer Bid Managers

Relevant Wincanton
Policies:

Speaking Up Policy,
Anti-Bribery & Corruption
Policy, Conflict of Interest
and Personal Ties Policy

Things to watch out for:

If you're not sure, keep it
confidential until you can
get some guidance



5.3 Working with others

- We aim to delight our customers through our commitment to innovation and continuous improvement
- We treat customers and partners fairly and with integrity and build mutually beneficial, collaborative relationships, regardless of the scale or length of our collaboration
- We treat confidential information provided to us with respect and use it only for legitimate business purposes
- We expect our suppliers and partners employees and their 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 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.

You must:

- Communicate clearly and honestly with our customers, suppliers and partners, taking care to protect commercially sensitive information and not to disclose confidential information without prior authorisation
- Make sure that all bids, contract negotiations and communications with customers and suppliers are accurate and truthful
- Comply with our supplier selection processes to make sure that suppliers are chosen objectively and on merit
- Contract with customers, suppliers and partners on clear terms and conditions and operate in accordance with them
- Follow our quality, safety and sustainable procurement procedures to ensure the integrity of our products and services, responding to any concerns appropriately and working with our suppliers to find mutually beneficial opportunities or solutions to any problems that arise
- Take appropriate action if behaviours by suppliers or partners are contrary to the Wincanton Way.



Subject matter owner:

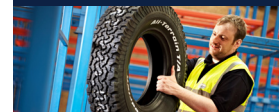
Sales Directors,
Procurement Director and
their respective teams and
Company Secretary

Relevant Wincanton
Policies:

Wincanton Supplier Code
and Modern Slavery and
Human Trafficking Policy

Things to watch out for:

Do our partners share our
values and are they working
collaboratively with us to
achieve our goals?



6.1 Authentic and responsible action

- We recognise that the social, environmental and financial impacts of our business and the businesses of our customers and partners extend beyond the local and national boundaries of our operations
- We encourage our colleagues to be aware of these wider impacts and believe that this encourages ideas and innovation on how we can contribute to addressing them in an authentic and responsible way
- We believe that the passion and proactivity of our colleagues can positively affect the health, safety and welfare of others, our environment and communities everywhere and for the long term.

We encourage you to:

- Maintain an interest in local issues, wider trends and social responsibility
- Promote and support authentic and responsible action outside the work place
- Feel empowered to suggest ideas and new ways of working that deliver a sustainable future.



Subject matter owner:

Head of Sustainability and CSR

Relevant Wincanton Policies:

Social Responsibility and Sustainability Policy

Things to watch out for:

Follow 'yammer' or your local site noticeboards and get involved in generating ideas and taking action



6.2 Community engagement

- We aim to be an economic and social asset to the communities in which we operate and which we affect through our business activities
- We encourage our colleagues and partners to get involved in constructive community activity as an integral part of the way we do business, supporting our sustainability strategy and future success
- Community activities help us to attract, recruit, retain, and engage our colleagues whilst at the same time building a positive profile in the communities in which we operate
- Our company charitable contributions are appropriate and proportionate
- We recognise that our local actions can have global impacts and affect communities beyond the UK&I and we seek to minimise these negative impacts of our operations.

We encourage you to:

- Get involved with your community in whatever capacity you can and support others who are doing the same
- Participate in fund-raising or charitable activities that you are passionate about
- Make your manager and colleagues aware of what you are doing outside work as they may be able to support you
- Listen carefully to requests or concerns from the community and raise them with your management team.



Subject matter owner:

Head of Sustainability and CSR

Relevant Wincanton Policies:

Social Responsibility policies

Things to watch out for:

Tell us about your community activity - maybe we can help or support



6.3 Political activity

- We engage with government agencies to communicate with them on matters relating to our business
- We do not make corporate contributions or donations to political parties, causes or any associated organisations.
- Our business does not favour one political party over another
- In their own time and outside the business our colleagues may participate in party politics or make personal political donations.



You must:

- Be transparent, honest and act with integrity in all dealings with government agencies and representatives
- Only respond to consultations or engage in lobbying for our business with appropriate prior authorisation
- Always work within the applicable legislation when lobbying for our business
- Not use our business time or resources to engage in personal political activities, without specific prior authorisation
- Not use corporate funds or assets for political donation.



Subject matter owner:

Company Secretary

Relevant Wincanton Policies:

Anti-Bribery & Corruption Policy

Things to watch out for:

Your politics are your business, not ours





Wincanton

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