



## Wickes Group plc

# Modern Slavery Statement 2025

### Introduction

Modern slavery is an umbrella term used to describe some of the most severe human rights abuses including forced labour, child labour, bonded labour and human trafficking. As a UK business with a global supply chain, we recognise our exposure to the risks of modern slavery. We are committed to help tackle these abhorrent practices by identifying, preventing, mitigating and remediating the risks of modern slavery happening in our operations and supply chains.

Tackling modern slavery is an important component of our Responsible Business Strategy. The Wickes Group is committed to conducting business honestly, professionally and fairly, and with care for our people and the people within our supply chains.

### About this document

This statement has been produced in accordance with Section 54 of the UK Modern Slavery Act 2015. It explains the steps taken by Wickes Group Plc and Wickes Building Supplies Ltd in the six areas covered by the updated Home Office guidance.

Wickes Group Plc and its subsidiary companies are referred to as "Wickes", the "Wickes Group" or "The Group" throughout this statement. This statement formally covers Wickes Group Plc and Wickes Building Supplies Ltd. It constitutes our slavery and human trafficking statement for these two entities for the 2025 financial year.

The Group has a 51% share of Gas Fast Ltd, trading as Wickes Solar, with a turnover below the reporting threshold. In the interests of transparency, we have included notable activities that the company has taken during the year to understand and manage its modern slavery risks.

This statement was approved by the Wickes Group Board on 19 May 2026 in relation to the financial period ending 27 December 2025.

David Wood  
Chief Executive Officer  
Wickes Group Plc  
19 May 2026

Approved by Board of Directors: Wickes Building Supplies Ltd - 19 May 2026

## Summary

### Overview of our progress in 2025

To further our understanding and strengthen our approach, we have done the following:

- Updated our Anti-Slavery Policy and Responsible Sourcing Policy to align with the principles set out in the UK Government's Transparency in Supply Chain Statutory Guidance.
- Enhanced induction training for our colleagues based in supporting roles, providing an introduction to their responsibilities in relation to business ethics and modern slavery.
- Updated our Whistleblowing Policy and improved the awareness and effectiveness of our Whistleblowing service and its purpose.
- Reviewed our contracting process with regard to modern slavery requirements for high risk Goods Not For Resale suppliers.
- Supported our part-owned subsidiary Wickes Solar to develop and implement appropriate policies in relation to modern slavery and rolled out the Modern Slavery e-learning training module to their colleagues.

### Areas of focus in 2026

The Board has agreed with management's recommendations that management focus on these areas in the next year:

- Review our existing policies and processes against the Government's new Transparency in Supply Chain Statutory Guidance and key international standards (such as the UN Guiding Principles, the OECD Due Diligence Guidance for Responsible Business Conduct, and ILO Labour Standards) along with the practices of other UK retailers. This will increase our understanding of the risks relevant to our business and help us focus our resources on the areas which will strengthen our ability to detect and remedy any modern slavery found within our business operations and supply chain.
- Update our modern slavery training and communications to align with our approach set out in our updated Anti-Slavery Policy.
- Develop our modern slavery related disclosures to meet more of the new recommendations introduced by the UK Government's Transparency in Supply Chain Statutory Guidance.

## Structure of the business

The main trading entity of the Group is Wickes Building Supplies Ltd – a home improvement retailer with revenues split between three customer segments: Local trade, Design and Installation, and DIY. All of our operations are situated in the UK (England, Scotland and Wales).

In 2025, we employed around 7,500 colleagues across our Group, operated 230 stores, and generated £1,636.2m revenue. We sell products direct to customers from our stores located in England, Scotland and Wales and also through our website ([wickes.co.uk](https://www.wickes.co.uk)). To support our business we also have: a Store Support Centre (head office) based in Watford, UK; two distribution centres located in Northampton, UK; a store delivery operation (Store Delivery Network) and a home delivery operation (Home Delivery Network) both operated from our Northampton based Distribution Centres.

The Group has a 51% share of Gas Fast Ltd, trading as Wickes Solar, with its office located in Castleford, UK. This is a small business that installs solar panels for consumers and commercially across the UK.

We fulfil our UK customer facing operations through a low-cost, efficient and integrated operating model, and an international supply chain. To fulfil this, we have a global supply chain of over 400 Tier 1 suppliers, with

around 100 of these supplying Wickes own brand products. The majority of our Tier 1 Goods for Resale (GFR) suppliers are UK registered companies.

To install kitchen, bathroom and solar in our customers' homes, we work with independent professional installers across the UK. We also partner with third-party providers for stock distribution, including the management of our home distribution centre, and deliveries to stores and customers, and we outsource various service activities such as certain IT services, store refit work, maintenance and cleaning.

The parent company of the Group, Wickes Group Plc, is a holding company without an operational role.

## Supply chain understanding

As a home improvement retailer, Wickes focuses on bringing approximately 55,000 product lines to the UK consumer market across 11 key categories:

1. Kitchens
2. Bathrooms
3. Building materials
4. Painting and decorating
5. Flooring and tiling
6. Garden and landscaping
7. Doors and windows
8. Electrical and lighting
9. Heating and plumbing
10. Tools and workwear
11. Renewables and energy

Over 80% of our GFR products (by volume and sales) are sourced from Tier 1 suppliers that are registered in the UK. We also source from Tier 1 suppliers based in the following countries:

- Austria
- Belgium
- Bulgaria
- Mainland China and Hong Kong
- Czech
- Germany
- India
- Ireland
- Italy
- Malaysia
- Netherlands
- Poland
- South Africa
- Spain
- Taiwan
- Türkiye

Our GFR suppliers cut across many industry groups that manufacture and produce products for the wider construction industry. The main industries include forestry, chemical, ceramics, electrical, steel, cement. We have continued longevity of supplier relationships, with many of our largest suppliers (categorised by spend) having a relationship with the business for over ten years.

The sourcing of goods or services not intended for consumers (goods not for resale or GNFR) is overseen by our Group Procurement team in our Commercial department and covers categories such as logistics, property management, professional services, and shop-fitting. IT procurement is managed directly by our in-house Tech team. Contracting with our nationwide network of around 3,000 Wickes-approved installation businesses is managed by our Installations team in our Operations department.

## Governance of modern slavery risk management

Responsible sourcing is a key component of our 'Built to Last' Responsible Business Strategy. Responsible sourcing is central to our work to prevent modern slavery.

The Wickes Group Plc Board has approved this statement and formally reviews policy and monitors performance on responsible sourcing practices, including modern slavery, through the Responsible Business Committee.

The Group’s Chief Executive Officer holds ultimate responsibility for overseeing the approach and actions related to responsible sourcing, ensuring accountability and strategic direction in addressing and ultimately eliminating modern slavery risks. The Group General Counsel and Company Secretary oversees responsible sourcing and modern slavery, monitoring progress and reporting to the Board and Executive team on modern slavery issues as appropriate.

The Head of Sustainability role has been assigned as the Group’s subject matter lead on modern slavery and reports into the Group General Counsel and Company Secretary. The Director of Legal and Governance, Director of Procurement and Quality, HR Director for People Services, and Head of Responsible Sourcing and Quality Assurance have also been assigned with specific responsibilities for overseeing modern slavery in their respective areas of the business. Together they are responsible for developing and monitoring our anti-slavery and human trafficking policies and controls, and reporting any material matters to the Board.

The Responsible Sourcing Steering Group is a cross-functional group that oversees the Group’s approach to managing and monitoring ethical sourcing issues in our supply chain, including the risk of modern slavery. It met quarterly in 2025, and was chaired by the General Counsel and Company Secretary, and attended by the Head of Sustainability, Director of Legal and Governance, Director of Procurement and Quality, and Head of Responsible Sourcing and Quality Assurance.

In 2025, we engaged with the British Retail Consortium on the updated guidance released by the UK Government and to improve our understanding of good practice carried out by other UK-based retailers.

We remain committed to continuous improvement, to identify where we need to strengthen our processes. Our knowledge of our UK operations is strong, focusing on building a strong colleague culture where people are treated fairly. Our understanding of our strategic Tier 1 suppliers remains good, in particular those suppliers who provide Wickes own brand products. We recognise that we have more work to formally map our supply chain below Tier 1 to further understand our risk.

## Policies in relation to modern slavery

We have provided an overview of our suite of policies that set out our approach to our colleagues to address the risk of modern slavery in our business and in our supply chain. Where we have published these policies on our corporate website for transparency, we have included a link within this statement.

<a href="#">Anti-Modern Slavery Policy</a>	Sets out the Group’s approach to any form of forced, bonded or involuntary labour, human trafficking, child labour, and other kinds of slavery and servitude within our own operations or within our supply chain.
<a href="#">Human Rights Policy</a>	Confirms the Group’s commitment to respect and promote human rights in accordance with internationally-recognised human rights, standards and legislation including the Human Rights Act. This policy also confirms that the Group respects the right of our colleagues to freedom of association and collective bargaining.

<a href="#">Responsible Sourcing Policy</a>	<p>Sets out how we source products and partners responsibly and set minimum standards across our supply chain. This approach is intended to meet all relevant legislative requirements, as well as to provide confidence for our customers and stakeholders that Wickes is a trusted partner and retailer.</p>
<p>Encouraging Equal Treatment Policy</p>	<p>Confirms our commitment to promoting equal opportunities for all colleagues and candidates. The aim is to ensure that all decisions relating to any aspect of employment are free from bias and are based on an individual's ability rather than their characteristics, (such as sex, race, disability, sexual orientation, age, gender reassignment, marital status or civil partner status, pregnancy or maternity).</p>
<a href="#">Whistleblowing Policy</a>	<p>Explains our approach to whistleblowing to stop harm by encouraging safe whistleblowing. Whistleblowing ultimately protects colleagues, customers, suppliers, other stakeholders and the Group by identifying and enabling us to address harm before it's too late. Our colleagues and suppliers have access to a confidential and independent whistleblowing service and are encouraged to report any concerns without any negative consequences for them in doing so.</p>
<p>Code of Business Ethics</p>	<p>This is the Group's Code of Conduct for all Wickes colleagues. This includes a specific section on modern slavery, including the red flags for colleagues to be aware of. The employee due diligence process, described in the following section, includes checks both across our direct colleague population and any temporary colleagues recruited via agencies.</p>
<a href="#">Supplier Code of Conduct</a>	<p>We expect that our suppliers demonstrate and share similar values to our own, especially in the areas of labour standards, health and safety, environment, business ethics and product quality. This Code of Conduct sets out our expectations for any supplier or contractor who works with us, and these are communicated to suppliers.</p>
<a href="#">Supplier Manual</a>	<p>Communicated alongside our Supplier Code of Conduct, our Supplier Manual explains specific requirements for supplier products to Wickes for resale.</p>

At a high level, our policies are aligned with key international standards that set out universal expectations for businesses in relation to human rights. In light of our commitment to continuous improvement, in 2026 we will assess our policies and processes against key international standards (such as the UN Guiding Principles, the OECD Due Diligence Guidance for Responsible Business Conduct, and ILO Labour Standards) to identify further improvements.

Of the policies listed, we have reviewed and updated the following policies: Anti-Modern Slavery and Human Trafficking Policy, Responsible Sourcing Policy and Whistleblowing Policy. We identified that our suite of policies did not include reference to remediation, and as such we have updated our Anti-Modern Slavery and Human Trafficking Policy to include specific reference to our approach to remediation.

During the year we updated our Whistleblowing Policy and relaunched the whistleblowing service to colleagues with an updated awareness campaign, including a video from our CEO asking colleagues to tell us about any concerns they had, and posters in all workplace locations with QR codes included to improve accessibility. This resulted in a 60% increase in whistleblowing reports across 2025 compared to 2024. 64 reports were received in total, of which none related to concerns about modern slavery.

Our policies are communicated to all colleagues when they start with the organisation and also via the company's internal intranet site.

Suppliers are made aware of our expectations and policies through the Supplier Code of Conduct. Relevant policies are also communicated to GFR suppliers at the start of each contract via a portal called Enable. We aim to work collaboratively with our suppliers and to create an environment that enables transparency throughout the supply chain. We promote our whistleblowing helpline to our suppliers for them to report concerns.

Suppliers' policies on topics such as modern slavery are reviewed by the Responsible Sourcing and Quality Team at the start of contracting and periodically via the Supplier Online Risk Assessment framework (SORA).

Information about the whistleblowing service is widely publicised across all sites, referred to in policies and included in our monthly colleague communications. Third parties are also encouraged to use the service and details are published in our Supplier Code of Conduct and on our supplier portal.

## Assessing and managing risk

### High level corporate risk assessment

The Group completes an annual high-level corporate risk assessment to (i) assess the Group's risks in relation to modern slavery, and (ii) assess whether the controls in place are sufficient to mitigate any identified risks and identify areas for improvement. The last risk assessment was completed in December 2025 by our subject matter leads. Both the findings and the identified improvement actions were subsequently reported to the Board.

### Individual supplier risk assessment

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

Suppliers are profiled to identify their human rights risk, including modern slavery and human trafficking. This includes:

- Checks on the country in which the supplier operates or trades in, to identify those with activities in countries with a higher risk of corruption. This is assessed using The World Bank's World Governance Indicators for Control of Corruption, Transparency International's Corruption Perceptions Index and Walk Free's 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's 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).

Our Supplier Online Risk Assessment (SORA) is a self-assessment questionnaire that evaluates compliance with our social and environmental requirements set out in our Supplier Code of Conduct and our Supplier Manual.

We require our GFR suppliers to complete our SORA on a minimum two-yearly basis to identify any key risks within our supply base. This process aims to confirm that simple practices are in place with our suppliers and their supply chains to identify potential modern slavery concerns.

During the reporting period, we completed our two-year SORA programme (2024-2025), assessing all our Tier 1 GFR suppliers and along with a selection of GNFR (goods not for resale) suppliers. In addition, our Responsible Sourcing team completed all planned in-person verification visits with key suppliers, including to suppliers located in China, Germany, India, Ireland, Italy and Türkiye.

Timber is a product identified in the Global Slavery Index as associated with a high risk of modern slavery. 98.8% of our timber sourced by the Group in 2025 was certified as responsibly sourced by either the Forest Stewardship Council (FSC) or the Programme for the Endorsement of Forest Certification (PEFC). Both the FSC and PEFC certification schemes require compliance with the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, prohibiting the use of forced or child labour.

Following the acquisition of 51% of Gas Fast Ltd, trading as Wickes Solar, in 2024, the Group has completed SORA assessments of its GFR suppliers and also visited solar production suppliers in China to validate.

## **Due diligence in relation to modern slavery (including approach to remediation)**

Our Responsible Sourcing and Quality (RSQ) team is responsible for managing the Group's modern slavery due diligence process for our supply chain. We continue to be members of the Sedex Information Exchange and our preferred methodology is the Sedex Members Ethical Trade Audit (SMETA) through recognised third party audit bodies, but we will also consider the Business Supply Chain Initiative (BSCI) and SA8000 audits.

Where we manufacture products under the Wickes own brand, we require all factories and manufacturers suppliers providing Wickes own brand products to undertake and deliver an acceptable ethical audit before we begin trading (such as Sedex Members Ethical Trade Audit (SMETA) or equivalent). Ongoing, we require that our own brand suppliers complete an ethical audit every two years, or once a year where a significant risk has been identified. These independent audits are designed to help protect workers from unsafe conditions, overwork, discrimination, low pay and forced labour as well as broader modern slavery or human trafficking risks. In addition, where we are sourcing own-brand products from East Asia, our local sourcing agents undertake regular ethical and product quality visits on our behalf.

We have Issue Response Plans which detail how the Group 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.

Within the reporting period, there have been no incidents of modern slavery identified, either within the business or its direct supply chain. We understand that this does not mean that modern slavery is not present in our

supply chain. We remain committed to reviewing our processes to focus on our highest risk areas to seek to identify, prevent and remedy modern slavery.

The goal of the Supplier Code of Conduct is for continuous improvement, and we seek to work with suppliers to improve their position rather than excluding them. However, if necessary, we will de-list a supplier or terminate a contract in response to a related non-compliance. This year no suppliers were de-listed or terminated for such reasons.

## Training

Our Code of Business Ethics includes a section on modern slavery and summarises the 'red flags' or warning signs for colleagues to look out for, and how to report any concerns via our independent whistleblowing service. The Code of Business Ethics is available to all colleagues through our internal intranet site, and all colleagues complete a mandatory annual e-learning training course on the key points of the Code.

We complement this with specific modern slavery training, which is required to be completed by all colleagues on an annual basis. For the majority of our colleagues, this is completed via an online interactive course including an end of course assessment. The Group developed this training in conjunction with a specialist compliance e-learning training provider, and tailored it to make it relevant to our colleagues. It covers the prevalence of modern slavery, explains the types of modern slavery, warning signs of modern slavery, and the legislative framework. It also covers key controls to prevent modern slavery including assessing the risks of supplier locations, industries, and the importance of due diligence, and how to report modern slavery issues.

We provide face-to-face training on the key points in the e-learning package for colleague populations who have more direct exposure to and control of potential modern slavery risk, including key operational roles such as our colleagues working in our Distribution Centres.

We monitor modern slavery training completion rates and report progress quarterly to the Executive team, and annually to the Board. In 2025, 98% of our colleagues completed the mandatory modern slavery training – the majority of colleagues who did not complete the training during the year were absent from the business due to illness or long term leave and non completion of training by colleagues in the business is followed up by line managers and tracked until completed.

We provide support and guidance to Wickes own brand suppliers to support the delivery of our policies, however at this time we do not provide specific training to suppliers on modern slavery.

Going forward we plan to review the training package to reflect the updates we have made to our anti-modern slavery policy. We will also review how we communicate modern slavery risk to colleagues and how to report any concerns not related to the business to the Modern Slavery Helpline.

## Monitoring and evaluation (understanding and demonstrating effectiveness)

To monitor our progress, we currently review the effectiveness of our controls on an annual basis and track whether there have been any reported incidents or concerns of modern slavery during the year. We also monitor colleague modern slavery training completion rates and follow up any instances of non-completion.

We recognise that tackling modern slavery is a collective responsibility, and we will continue to develop our approach to monitoring and evaluating our processes and controls to demonstrate their effectiveness. We will continue to review new guidance and market practices to keep our knowledge and understanding current and to learn from others.