

Wickes Group plc - Responsible Sourcing Policy

At Wickes, **how** we work is as important as **what** we do.

Our **Winning Behaviours** underpin the way we work and guide us to **do the right thing**.

This means that we source product responsibly and set minimum standards for our suppliers

Quick Read

What does this policy address

This policy defines the steps we need to take in order to source quality products and services in a safe, sustainable and legally compliant way using responsible suppliers and partners, protecting our customers and reducing the risk of regulatory action or supply chain disruption. This policy is not only intended to meet the relevant legislative requirements but also to give confidence to customers and other stakeholders that Wickes is a trusted partner.

Doing the Right Thing

- We enter into supplier contracts as determined in our Commercial Procedures documents to protect the business.
- We comply with all relevant product, sourcing and marketing laws for the countries in which we operate.
- We risk-profile all product categories and suppliers in order to best target due diligence work.
- We will conduct due diligence on suppliers using a risk based approach.
- We continually assess our manufacturing sites to ensure they are operating to our standards.
- We define clear commitments on what we expect and make these available to our suppliers.
- We provide guidance to suppliers on their policies and processes to tackle modern slavery.
- We monitor product returns, issues and incidents to address the safety and concerns of our customers to continually improve.
- We train all colleagues to effectively meet the requirements of the policy.

What this means for you

- **Do** read, understand and comply with this policy.
- **Do** only source products that comply with legal standards and all relevant regulations.
- **Do** ensure that suppliers are risk assessed and approved in accordance with Wickes procedures.
- **Do** only trade with a supplier (of products or services) when unsatisfactory risks have been mitigated.
- **Do** avoid conflicts of interest by maintaining arm's-length relationships and declare any conflicts of interest to the extent they exist.
- **Do** complete the responsible sourcing training before you source products or services.
- **Do** report any known or suspected responsible sourcing issues to your line manager or the Responsible Sourcing team (compliance@wickes.co.uk) or via our anonymous Whistleblowing line 0800 949 6396 or our anonymous [Whistleblowing portal](#).

Who does this policy apply to

This policy applies to all officers, employees and temporary workers (such as consultants, contractors, casual and agency staff) of Wickes and its subsidiaries.

Where to go for help

Policies and guidance can be found under 'Business Ethics - Doing the Right Thing' and you can also speak to your line manager or contact the Legal team for advice.

Failure to comply

Failure to comply with this policy, intentional or otherwise, may lead to disciplinary action (up to and including dismissal). In addition, failure to comply with specific regulations (see below) may result in penalties for Wickes.

Approved by the Wickes Executive Board on 26th June 2024.

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Wickes Group plc - Responsible Sourcing Policy

1. Introduction

We are committed to sourcing and selling the right products and services from the right partners, ensuring legal compliance and protecting our customers and society from harm, and adopting best practice. Wickes takes a zero-tolerance approach to non-compliance with regulation and our policies relating to product standards and ethical behaviour in the supply chain.

Examples of relevant regulations are listed later in this policy document and include Construction Product Regulations, UK Timber Regulations, the Bribery Act and the Modern Slavery Act.

See section 7 below for a list of other policies that are relevant to responsible sourcing.

2. Scope

This policy applies to all officers, employees and temporary workers (such as consultants, contractors, casual and agency staff) of Wickes Group plc (“the Company” “we” or “wickes”) and its subsidiaries (together “colleagues”). It is our joint responsibility to ensure that we comply with this policy in our daily working lives regardless of whether local law or practices might permit something to the contrary.

As part of our commitment to responsible sourcing we must ensure that third parties acting on our behalf also comply with effective responsible sourcing policies. Accordingly, where we engage third parties such as suppliers, agents, distributors or joint venture partners, we have an obligation to complete sufficient due diligence when entering into arrangements to ensure that they are acting legally and ethically.

3. What is Responsible Sourcing?

Responsible sourcing entails:

- compliance with Commercial Procedures as detailed in section 4.2 below;
- compliance with product and ethical sourcing regulations and policies; and
- continual review and improvement to reduce the cost of failure.

There is increasing interest from many of our stakeholders, including, government, regulators, customers and investors in having evidence of product compliance and ethical supply chain behaviours. Besides managing the businesses’ own risks which may arise from product or supplier issues, there is an opportunity to win customers or gain market advantage by demonstrating leadership in this area.

4. Policies and Procedures

4.1 Minimum Standard for Responsible Sourcing

<i>What is this?</i>	A framework that details the minimum activity required by Wickes to meet the responsible sourcing policy. An accompanying scoring tool is available to help us assess our current level of maturity against the standard.
<i>Why do we do it?</i>	To understand risk in the business against our requirements and provide support where required to achieve minimum requirements.
<i>Where can I find the relevant files?</i>	The Minimum Standard is held by the Responsible Sourcing and Quality team

4.2 Commercial Procedures

<i>What is this?</i>	Commercial procedures are in place for each of Goods For Resale (GFR) and Goods Not For Resale (GNFR) to ensure consistency of approach and protect our business interests. The documents can be found on the commercial portal.
<i>Why do we do it?</i>	To ensure a minimum level of contractual protection for Wickes in its commercial agreements with suppliers, based on the supplier type and spend.
<i>Where can I find the relevant files?</i>	The Commercial Procedures are held by the Commercial team.

4.3 Supplier and Product Category Risk Profiling

<i>What is this?</i>	Risk profiling provides a standard approach for applying risk factors across supplier and product categories.
<i>Why do we do it?</i>	Supplier risk profiling enables the business to identify suppliers which carry higher risks in order to prioritise suppliers for due diligence and manage risks in the supply chain. These risks types include for example safety, quality, human rights, modern slavery and anti-bribery. Product risk profiling enables the business to identify higher risk product categories in order to manage safety risks and comply with the General Product Safety Regulations (“GPSR”) so that we can prioritise due diligence on suppliers of higher-risk product types.
<i>Where can I find the relevant files?</i>	All files are managed by the Responsible Sourcing team.

4.4 Supplier Manual

<i>What is this?</i>	The Supplier Manual provides guidance to suppliers on how to get products into Wickes.
<i>Why do we do it?</i>	To provide clear guidance to all suppliers on specific requirements relating to the supplier and product approval process, how to make a safe delivery to the business and inspection activities.
<i>Where can I find the relevant files?</i>	The Supplier Manual can be found on the website: https://www.wickesplc.co.uk/suppliers/supplier-overview/

4.5 Supplier Online Risk Assessment (“SORA”)

<p><i>What is this?</i></p>	<p>The SORA is an online questionnaire used to risk-assess suppliers on responsible sourcing topics (including environmental management, ethical trading and quality compliance). It is completed by all GFR suppliers and GNFR suppliers who supply products. The SORA is completed for new suppliers and then every two years. The SORA identifies risk in our supply chain, categorised as satisfactory, a concern or unsatisfactory. Trading is paused with any supplier where an unsatisfactory issue is identified until the issue is resolved or a satisfactory action plan agreed. Concerns are monitored against agreed timescales until they are resolved.</p>
<p><i>Why do we do it?</i></p>	<p>The SORA is used to profile suppliers and identify and mitigate risks in the supply chain. It supports multiple compliance needs including safety and product requirements and ensures that we only source from approved suppliers. It is a key tool for the business in conducting due diligence in line with the requirements of legislation such as the Modern Slavery Act 2015 and Bribery Act 2010.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>The Responsible Sourcing team retains a log of SORA results.</p>

4.6 Manufacturer Audits and Inspections

<p><i>What is this?</i></p>	<p>Assessments are carried out on sites that manufacture products on behalf of Wickes or marketed under the Wickes brand.</p> <p>There are two forms of Assessment; Technical and Ethical.</p> <p>Wickes are SEDEX members and require all Ethical audits to be conducted to the SMETA or an equivalent standard. All Ethical audits must be conducted by a recognised 3rd party approved by Wickes. Technical assessments are conducted by our in-house Responsible Sourcing team and our approved agents. These assessments are conducted during the product development stage and thereafter if the site has non-conformances to address or there are known product issues.</p> <p>Ethical audits are required at the new product introduction stage and thereafter on a 2 year cycle or earlier if the manufacturer has concerns to address or there are known ethical issues.</p> <p>Audits are semi-announced, giving a two week window within which the auditor will arrive at site. Unannounced audits may also be conducted if there are serious concerns at a site.</p> <p>Inspections (both pre-shipment inspections and ‘goods-in’ checks) are carried out to ensure the quality of products.</p>
<p><i>Why do we do it?</i></p>	<p>Audits and inspections provide assurance on product quality and supplier behaviours in order to protect the safety & human rights of all workers involved in the supply chain, customers and the Wickes’ brand.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>The Responsible Sourcing team retains copies of all audits on the Sedex platform.</p>

4.7 Product Technical Files

<p><i>What is this?</i></p>	<p>Technical files contain the information that proves that our products conform with the appropriate regulations and standards. A technical file also contains a product risk assessment as part of the approval process for placing the product on the market - this is a requirement of the GPSR.</p> <p>The Responsible Sourcing team is responsible for retaining a technical file where we apply the Wickes brand to a product or where a product is marketed under the Wickes brand.</p> <p>The Responsible Sourcing team also holds technical specifications on supplier brands where required legally, in order to make that information available to customers.</p>
<p><i>Why do we do it?</i></p>	<p>The maintenance of a technical file is a mandatory requirement under legislation where we are considered the manufacturer and it also supports other compliance requirements.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>Technical files are compiled and maintained by the Responsible Sourcing team.</p>

4.8 Product and Marketing Compliance

<p><i>What is this?</i></p>	<p>Product Compliance means that the product meets the safety and regulatory requirements of the associated regulations, directives and standards (including ISO and BS standards plus any other relevant regulation or guidance notes issued by an enforcement authority or other professional body).</p> <p>Marketing Compliance means that any product marketing claims proposed by suppliers for promotion on business websites and social media or in business publications are tested to ensure compliance with the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) and The UK Code of Broadcast Advertising (BCAP Code), the Green Claims Code, the Advertising Standards Authority's advice and guidance, the Competition and Market Authority advice and guidance and other pricing and promotion regulations and guidelines.</p>
<p><i>Why do we do it?</i></p>	<p>Product compliance is required for the following key reasons:</p> <ol style="list-style-type: none"> 1. safety during handling, installation/assembly, use and dismantling/disposal; 2. to meet legal requirements; and 3. for the provision of products to an agreed quality standard (fit for purpose). <p>Marketing compliance is required to make sure we are: (i) clear and transparent to our customers, protecting them from being misled; and (ii) to make sure we are compliant with rules and regulations prescribed by regulators to protect consumers from deceptive or manipulative practices.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>Product compliance forms part of the Technical File and Technical Specification. See the section "Compliance with Policy" below for a list of current relevant regulations.</p>

4.9 Product issues, returns and recalls

<p><i>What is this?</i></p>	<p>Product issues and returns occur when a product fails unexpectedly, does not perform for the purpose it is designed or is not as it was described. Customers can return products to a store for repair, replacement or credit.</p> <p>Recalls relating to a safety concern results in a batch (or all) of a particular product sold being recalled to prevent possible injury or damage to property. For lower-risk concerns a full recall may not be actioned and the business may instead opt to take the product off sale and remove stock from within the distribution hubs and store network. In this instance, a safety notice would be issued to end users to provide them with information on safe use or proposed actions to be taken (e.g. replacing a component) to reduce a safety risk.</p> <p>Care is taken with regard to GDPR requirements when using customer information for organising recalls.</p>
<p><i>Why do we do it?</i></p>	<p>The overriding reason for monitoring and taking appropriate action is to ensure all products remain safe as required by the GPSR. Other reasons include customer satisfaction, continuous improvements and cost recovery through supplier Service Level Agreements where a product is not performing as stated.</p>
<p><i>Where can I find the relevant files?</i></p>	<p>The Responsible Sourcing and Quality team (RSQ team) collates and retains all information on take off sales, safety notices and recalls.</p>

4.10 Products, chemicals and materials of concern

<p><i>What is this?</i></p>	<p>Some products, or chemicals/materials that are a component of a product, can pose negative environmental or social impacts during their manufacture, use or disposal. As the impacts are better understood, certain products or materials may be highlighted as a concern, and be the subject of future Government phase-outs or campaigns by charity or consumer groups.</p> <p>We have made public commitments that relate to the following materials of concern for all products we sell:</p> <ul style="list-style-type: none"> ● Timber: We aim to only source responsibly sourced timber certified by FSC or PEFC. ● Compost: We will not source peat from the start of 2024 onwards (including all bagged compost containing peat, and growing medium for plants). <p>We have made public commitments that relate to the following materials of concern for all own-brand products we sell:</p> <ul style="list-style-type: none"> ● Chromium 6: We are removing Chromium 6 from all our own brand products, replacing it with Chromium 3 or other suitable alternatives.
<p><i>Why do we do it?</i></p>	<p>The overriding reason for taking early action on materials of concern is to manage risks to our brand and external reputation as a responsible business. Other reasons include preparing suppliers for changes, trailing alternative products that meet customer satisfaction and make the ultimate switch easier.</p>

<i>Where can I find the relevant files?</i>	<p>The Responsible Sourcing and Quality team (RSQ) collates and retains all information on banned products of concern. This Policy will be updated where the business has agreed to take an early position on materials of concern.</p> <p>The Sustainability Team maintains a document 'Environmental Legal and Policy Horizon Scan' which logs materials of concern. This is used to inform discussions with the Commercial team on the appropriate position for the business to take, taking into account commercial and reputational impact.</p>
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We must not engage any third party that we know or suspect of major product or supplier issues. Appropriate due diligence should be undertaken on identified higher-risk organisations before they are engaged to work with us. The appropriate level of due diligence will vary depending on the type of organisation and the identified level of risk, as detailed in this policy.

5. Compliance with Policy

Failure to comply with this policy, intentional or otherwise, may lead to disciplinary action (up to and including dismissal). In addition, failure to comply with specific regulations (selected examples below) may result in the listed corporate penalties for Wickes.

Regulation	Maximum Penalty
Product regulation	
Construction Products Regulations	Notice of warning, seizing of products, recalls
UK Timber Regulations	2 years imprisonment, unlimited fine and product seizures
UK REACH and biocides Regulations	2 years imprisonment and/or unlimited fine
Low Voltage Directive	3 months imprisonment and unlimited fine
Water Supply (Water Fittings) Regulations	A fine not exceeding level 3 on the standard scale, currently £1,000 per incident
Pressure Equipment Directive	2 years imprisonment and/or unlimited fine
Gas Appliances (Enforcement) and Miscellaneous Amendments Regulations 2018	3 months imprisonment and unlimited fine
Supplier regulation	
Modern Slavery Act 2015	Corporate disclosure: Injunction. Corporate offence: Prison & fine
Bribery Act 2010	Up to 10 years imprisonment and unlimited fine

6. Reporting Concerns

If you are concerned about a product or supplier issue, then you should speak up. Discuss your concerns with your line manager and notify the Responsible Sourcing team. Additionally our Whistleblowing line (0800 949 6396) or our [Whistleblowing portal](#) can be used to raise any concerns anonymously.

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We know it takes courage to speak up and you will not suffer any detrimental treatment as a result of raising a genuine concern. Please see our [Whistleblowing Policy](#) for more information.

Approved by the Wickes Executive Board on 26 June 2024.