

Modern Slavery Transparency Statement 2024

This statement has been produced in accordance with Section 54 of the Modern Slavery Act 2015. It constitutes our slavery and human trafficking statement for Wickes Group Plc and its relevant subsidiaries* (listed below) for the financial year ending 28 December 2024. Wickes Group Plc and its subsidiary companies are referred to as “Wickes”, the “Wickes Group” or “The Group” throughout this statement.

This statement covers the six areas outlined in the Home Office guidance: organisation structure, business and supply chains; policies; risk assessment; due diligence processes; training about modern slavery; and goals and key performance indicators to measure the effectiveness of actions and progress over time.

* This statement covers the activities of Wickes Group Plc and its relevant subsidiaries in the reporting period with a turnover of £36 million or above:

- Wickes Group Plc
- Wickes Building Supplies Ltd

In May 2024, the Group completed the acquisition of 51% of Gas Fast Ltd, trading as Solar Fast. Gas Fast Ltd is referred to as “Solar Fast” throughout this statement. This is a UK based, small and medium sized business that installs solar home energy solutions.

In 2024, the company’s turnover was below the reporting threshold of £36 million. Although Solar Fast is not required to publish a Modern Slavery Statement, we have included notable activities that the company has taken during the year in relation to understanding its modern slavery risks.

This statement was approved by the Wickes Group Board on 17 March 2025 in relation to the financial period ending 28 December 2024.

A handwritten signature in black ink, appearing to read 'DW', is positioned above the name of the signatory.

David Wood
Chief Executive Officer
Wickes Group Plc
17 March 2025

Entities covered by this statement

This statement covers Wickes Group Plc and all its subsidiary undertakings. This includes the following UK subsidiaries with a turnover of £36 million or above:

Date signed off by Board of Directors:
Wickes Building Supplies Ltd - 17 March 2025

Summary

We take a zero tolerance approach to modern slavery and human trafficking.

Modern Slavery is an umbrella term used to describe slavery, servitude and forced or compulsory labour, and human trafficking. The Wickes Group is opposed to all forms of unethical business behaviour, and has a zero-tolerance approach to any form of modern slavery. We recognise the harmful impact that modern slavery has on individuals and society, and we are committed to help prevent these illegal practices taking place within the business or our supply chain.

Modern slavery is an important component of our Responsible Business Strategy (Strategic Report page 50, 2024 Annual Report). 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.

Our biggest risk of modern slavery is in our supply chain. We are committed to upholding human rights and promoting positive working conditions and practices throughout our supply chain, and we commit to meet the principles of the Ethical Trade Initiative (ETI) Base Code. We aim to work collaboratively, and to create an environment that enables transparency throughout the supply chain. We promote our independent whistleblowing helpline to our suppliers for them to report concerns. We are a member of SEDEX, a leading platform that supports the management and improvement of working conditions in supply chains, and we require all suppliers providing Wickes own brand products to undertake and deliver an acceptable ethical audit (known as SMETA audits) before we begin trading.

During 2024, no incidents of modern slavery were identified by the Group in our own business or our supply chains, and no reports relating to modern slavery were registered via our independent whistleblowing service.

About Us

Wickes is a home improvement retailer, with revenues split between our three customer segments - Local trade, Design and Installation, and DIY retail. All of our operations are situated in the UK (England, Scotland and Wales). In 2024, we had around 7,400 colleagues across our Group, and we operated 228 stores. We sell products via our website (wickes.co.uk) for collection from our stores or direct delivery to customers located in England, Scotland and Wales.

To support our business we also have:

- A Store Support Centre (head office) in Watford;
- Two distribution centres located in Northampton and an outbase in Crawley;
- A store delivery operation (Store Delivery Network); and
- A home delivery operation (Home Delivery Network).

We launched our Responsible Business Strategy 'Built to Last' in 2022. Our strategy has three core pillars: People, Environment and Homes which cover the sustainability topics where we can create most impact. These are underpinned by three fundamental topics: Safety and Wellbeing, Responsible Sourcing, and Ethical Business Conduct. These are priority topics that we measure and manage to ensure we continue to operate responsibly through our business and supply chain activities. Our approach to tackling modern slavery forms a core part of our approach to Responsible Sourcing.

Our Supply Chains

We fulfil our UK customer facing operations through a low-cost, efficient and integrated operating model, as well as an international supply chain, that works to source responsibly and ethically. We have our own brand label, and we source many products from UK based suppliers. Most of the products we sell are manufactured overseas. We use supply chain partners for sourcing from East Asia, who undertake ethical and product quality audits on our behalf.

We work with a nationwide network of around 3,000 Wickes-approved installation teams to install kitchen and bathroom projects in our customers' homes. We partner with third-party providers for stock distribution, including the management of our home distribution centre, and deliveries to stores and customers. We also outsource various service activities such as certain IT services, store refit work, maintenance and cleaning.

The UK Modern Slavery Act 2015 states clear expectations of businesses to eradicate slavery both within their workforce and in their supply chain. It is important that all Wickes colleagues, officers, directors and other third parties conducting business with us, including contractors and suppliers, comply with this legislation.

Governance

Our approach to modern slavery is overseen by the Group General Counsel and Company Secretary, who monitors progress and reports 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. The Director for Legal and Governance, Director for Strategic Procurement, HR Director for People Services, and Head of Responsible Sourcing 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 matters to the Board.

During 2024, the Responsible Sourcing Steering Group met quarterly to oversee the Group's approach to managing and monitoring ethical sourcing issues in our supply chain, including the risk of modern slavery. This is a cross-functional group chaired by the General Counsel and Company Secretary, and attended by the Director of Legal and Governance, Director of Strategic Procurement and Quality Assurance, Head of Responsible Sourcing, and Head of Sustainability.

The Wickes Group Plc Board has approved this statement and formally reviews policy

and monitors performance on modern slavery annually.

Policies and control on modern slavery

Responsibility for compliance with our policies sits with all colleagues, and this is supported through training.

We have a [Modern Slavery and Human Trafficking Policy](#) which sets out the Group's zero tolerance 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. The Modern Slavery and Human Trafficking policy is supported by other Group policies, including our Human Rights Policy, Responsible Sourcing Policy, Encouraging Equal Treatment Policy and Whistleblowing Policy.

The Group's [Human Rights Policy](#) confirms our 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.

Our [Responsible Sourcing Policy](#) ensures that 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.

Our [Encouraging Equal Treatment Policy](#) 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).

Our [Whistleblowing Policy](#) sets out 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.

Reports of calls made to the whistleblowing service are provided to the Executive team and the Board on a regular basis.

Regarding our own colleagues, 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**. 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.

We ensure 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. The Wickes [Supplier Code of Conduct](#) sets out our expectations and are communicated to our suppliers, alongside 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 Code of Conduct. This specifically covers modern slavery requirements by requiring suppliers adhere to the Ethical Trading Initiative's *ETI Base Code*.

Risk assessment and management

Our subject matter leads complete an **annual 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 results of this and improvement actions identified are reported to the Board.

Our **Supplier Online Risk Assessment (SORA)** and due diligence procedures measure compliance with our requirements around social and environmental behaviours in our supply chain. These are set out in our Supplier Code of Conduct and our Supplier Manual.

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).

Due diligence within our supply chains

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.

We have set out all of our requirements in our **Supplier Code of Conduct**, which we expect all suppliers to adhere to.

We require our GFR suppliers to complete our SORA on a minimum two-yearly basis to identify any key risks within our supply base. 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 own brand, factories and manufacturers undergo a SMETA or equivalent ethical audit on a minimum two-yearly basis.

Timber is a product identified in the Global Slavery Index as associated with a high risk of modern slavery. 99.8% of our timber purchased by the Group in 2024 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.

In 2024, we continued to assess the modern slavery risk of our **Goods not for Resale (GNFR)** suppliers, and we are rolling out this process to existing GNFR suppliers that are profiled as high risk of modern slavery.

Following the acquisition of 51% of Gas Fast Ltd, trading as Solar Fast, the Group has commenced SORA assessments of the modern slavery risk associated with its solar products suppliers.

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Due diligence within our own business

The Group's direct recruitment adheres to all regulatory requirements, including those that relate 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 also provide a 'sign off sheet' for each agency worker coming to our sites, including their name and photograph. The agency workers are required to bring their identification documents on their first day, which the Group checks 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 red flag of gang controlled victims.

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Issue response

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.

Training on modern slavery

Our Code of Business Ethics includes a section on modern slavery and details the red flags for colleagues to keep an eye 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 have to complete an annual e-learning training course on the key points of the Code.

We complement this with 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 online training. We provide face-to-face training 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.

Goals, KPIs Performance and Progress in 2024

We track whether there have been any reported incidents of modern slavery during the year. During 2024, we are not aware of any incidents of modern slavery being identified in our own business or our supply chains, and no reports relating to modern slavery were registered via our independent whistleblowing service.

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

Governance

- We formalised our governance of modern slavery risks by repurposing existing cross functional working meetings into a Responsible Sourcing Steering Group, chaired by our General Counsel and Company Secretary.

Policies and controls

- We reviewed and published updates to key related policies on our website, including our Modern Slavery & Human Trafficking Policy, Human Rights Policy, and Responsible Sourcing Policy.
- We reviewed the effectiveness of our whistleblowing service and identified opportunities to make improvements.

Risk assessment, management and due diligence in our business

- We have updated our line manager tool kit for recruitment, which includes more guidance on completing Right to Work checks. We have also moved to digital Right to Work checks, which are undertaken as part of the onboarding process of new starters.
- We improved the controls for reviewing and updating the Right to Work documentation to ensure timely action on expiring documents. We now undertake monthly checks to ensure that expired documents are identified and appropriate action is taken in a timely manner.

Risk assessment, management and due diligence in our supply chain

- In line with our process, we have continued to onboard all new GFR suppliers through our SORA process.
- Following our acquisition of Solar Fast in 2024, we also commenced the SORA process with their key suppliers.

- We completed a risk profile of all our GNFR suppliers for modern slavery risk. From this we identified a shortlist of suppliers assessed to be at highest risk, who were requested to complete a SORA in 2024. We are following up with the suppliers that we did not receive a response from, and in 2025 we will move on to assess the next set of suppliers.
- We strengthened our contractual requirements for our installers on Right to Work checks and reporting concerns of potential modern slavery to the whistleblowing service.
- We drafted a new Supplier Code of Conduct and made updates to our Supplier Manual, reconfirming our zero tolerance approach to modern slavery and human trafficking.

Training and awareness raising

- We reviewed the effectiveness of our modern slavery e-learning module. Over 97% of our support colleagues completed our mandatory modern slavery training – either via the e-learning module or in-person training for operational colleagues at our Distribution Centre.
- 82% of our retail colleagues completed our combined Business Ethics e-learning module which includes information about modern slavery. We also confirmed that our logistics partner, which operates our Homes Distribution Centre and Home Delivery Network on our behalf, had completed modern slavery training for their eligible colleagues on the Wickes contract.
- We raised awareness with our store colleagues that are located in areas, such as London, that have experienced incidences of people waiting to be collected for work in external areas (such as store car parks) and as such may be at risk of modern slavery. We have highlighted modern slavery red flags to store managers and explained how to report any concerns to the national Modern Slavery Helpline.

Focus for 2025

Continuing our zero tolerance approach on modern slavery and human trafficking, we have identified the following focus areas for 2025.

Governance

- Maintain a watching brief of any material changes to the UK Government's policy and/or guidance relating to modern slavery due diligence and preparing Modern Slavery Statements, and understand impacts for the Group.

Policies and controls

- Implement actions identified to improve the awareness and effectiveness of our whistleblowing service, and its purpose.
- Review contracting process with regard to modern slavery requirements for high risk suppliers.

Risk assessment, management and due diligence in our business

- Annual review of the business's current processes to ensure they remain effective.

Risk assessment, management and due diligence in our supply chain

- Roll out the updated SORA process to all GFR suppliers, and continue to assess new and high-risk GNFR suppliers through our SORA process.
- Support our part-owned subsidiary Solar Fast to develop and implement appropriate policies in relation to modern slavery and oversee their compliance.

Training

- Enhance induction training for our colleagues based in supporting roles, providing an introduction to their responsibilities in relation to business ethics.
- Support our part-owned subsidiary Solar Fast to roll out modern slavery training.
- Provide a simple guide for colleagues on modern slavery red flags and how to report any concerns not related to the business to the national Modern Slavery Helpline.