



witham
GROUP

THE WITHAM WAY

Our Core Values & Business Code of Conduct



Blending Quality, Value & Service since 1921

withamgroup.co.uk



A Message from Nigel R Bottom - Managing Director Witham Group:

Witham Group are committed to being a responsible business. Our people are our biggest asset and Witham is committed to creating a positive and empowering work environment in which all employees feel valued for the work they do and the impact they make.

Everything we do is underpinned by the five principles of our business, or core values. We call these 'THE WITHAM WAY'. In practice, each core value relates to the way our own business operates, how we treat our colleagues, customers, suppliers and contacts. These cornerstones are the key fundamentals that make up our business.

In addition, our aim is to always operate within a climate of excellence and to the highest standards of ethical and professional behaviour. Our relationships with our suppliers are critical to successful performance.

Trust is and always has been at the heart of how we do business at Witham Group. This Code of Conduct is not just about following law and regulation, it is about doing the right thing, even when no one is watching. It is a non-negotiable standard of behaviour which is expected from all of us and is designed to protect you, our business and our brand. It is fundamental for our customers and colleagues that we operate in a supply chain that is free from corruption, where human rights are respected and protected and where we treat our suppliers fairly and without duress.

Our customers need to know that our products are safe, that we care about the impact that we have on the environment and that we will never mislead them in our pricing or advertising. This Code of Conduct therefore outlines our minimum standards for how we should all conduct ourselves, to meet and exceed these expectations. Please take the time to read and understand the Code, so that you know where to go for help and how you can speak up without fear or favour, should you need to. If you have any questions about it, please contact us.

This Supplier Code of Conduct sets out behaviours that we expect of suppliers who are delivering services on to and on behalf of Witham Group. In selecting suppliers, Witham Group performs checks that are in line with procurement regulations that guarantee fair access to opportunities for all suppliers and equal treatment during selection processes. In addition, Witham Group suppliers are expected, when delivering services, information or goods, to act in a manner that is compatible with Witham Group's Core Values.





EXCELLENCE

- Always putting people first
- Always acting honestly and with integrity
- Providing the best customer service we can
- Manufacturing the best quality products
- Having a strong work ethic
- Being open and fair with our customers, employees and suppliers
- Aiming to be the best at what we do
- Keeping up to date with the latest technological advances
- Having high standards of management processes and systems in place
- Complying with all relevant laws as a minimum standard
- Offering high quality technical expertise and support to our customers and distributors
- Putting something back into our community by helping local charities and causes
- Looking after our teams and having some fun along the way



SAFETY

- Safety for us is everything
- Ensuring our commitment to health and safety is inherent in all that we do
- Adhering to our Health and Safety Policy and complying with all relevant laws as a minimum
- Ensuring all regulatory requirements for product safety, testing and labelling are adhered to
- Proactively communicate potential hazards to all stakeholders and take appropriate measures to prevent accidents, including regular assessments and checking of operational risks and equipment
- Continually assess raw materials, products and labelling to minimise risks
- Keeping our employees fully trained and as up to date with health and safety information and procedures as best we can
- Keeping our customers as safe as possible by providing up to date health and safety information on all our products



SUSTAINABILITY

- Working hard to put the environment at the heart of all that we do
- Our [Environmental & Sustainability Policy](#) sets out what we continue to strive for which is to reduce our impact on the environment for today and tomorrow
- Having clear objectives and aims across the business to improve our environmental credentials and set up competent and reliable measuring and monitoring systems
- ISO 14001 is the basis of our management system for our environment and sustainability standards
- Complying with all applicable environmental legislation and regulations
- Actively improving the efficiencies with finite resources such as energy, water and raw materials
- Aiming to reduce energy usage across the business, having installed solar panels at our depots, harvested rainwater and drastically reduced the amount of gas in our manufacturing process by over 90% thanks to new technology
- Continually developing more environmentally sensitive and biodegradable products
- Inventing new technology to reduce energy and time in our production processes
- Monitoring the amount of carbon our lorries produce and using low emission technology in our vehicle fleet
- Operating several company cars on an electric or hybrid basis
- Responsibly collecting and safely disposing of our waste materials is of great importance to us and we have invested in new machinery to help with cardboard waste as well as continually seeking out new recycling opportunities within the business
- For full information please refer to our [Environmental & Sustainability Policy](#)





RESPECT

- Creating a happy and inclusive work force
- Every employee is required to treat others with dignity and respect. This also applies to customers, suppliers and third parties
- Maximising well-being for all our employees and keeping them up to date with what is going on
- Complying with all applicable employment laws
- Not tolerating any form of modern slavery or forced labour
- Not accepting any form of bribery, including improper offers for payments, commissions or kickbacks in monetary or any other form, to or from employees
- Operating with fair market behaviour and compliance with competition law
- Transparency in our conduct of all relationships with customers and suppliers
- Complying with relevant money laundering requirements
- Operating within our Data Protection Policy ensure confidentiality of all data, personal employee and customer information and ensures all data is used purely for the intended purpose and never used for any personal or financial gain
- Ensuring working hours comply with national laws
- Offering a free professional Employee Support Service, with 24 hours availability for all employees
- Professionalism in everyone's conduct is required at all times



EQUALITY

- Fully complying with the Equality Act 2010 to ensure everyone is treated equally
- Ensuring we maintain high standards of care for our employees and abide by all human rights and employment legislation as a minimum
- Offering equal opportunities of employment to individuals
- Nurturing a collaborative working environment
- Ensuring every job role is valued
- Ensuring all employees are chosen on the basis of their capabilities and qualifications
- Being free of discriminatory or sexist language or behaviour
- Having an 'open door policy' for all employees at all levels of management





HOW WITHAM GROUP DOES & EXPECTS TO DO BUSINESS

1. ANTI-BRIBERY & CORRUPTION

Witham Group does all it can to act with integrity in all its business dealings and commercial relationships. We are committed to the highest standards of ethics and honesty, and we operate a zero-tolerance approach to bribery and corruption. The giving or receiving of bribes, and any other form of corrupt payment, in any course of conduct involving Witham Group, is unacceptable. We stipulate that suppliers adhere to anti-corruption laws, including but not limited to the Bribery Act 2010, and anti-money laundering regulations.

We expect suppliers to have robust processes to ensure that the subcontractors in their supply chain also comply with these laws. Suppliers should immediately notify Witham Group where fraudulent practice is suspected or uncovered and disclose any interests that might impact their decision making or the advice that they give to Witham Group.

2. CONFLICTS OF INTEREST

No business dealings on behalf of Witham Group will be inappropriately influenced by personal considerations or personal relationships. We expect suppliers to mitigate appropriately against any real or perceived conflict of interest. A supplier with a position of influence gained through a contract should not use that position to unfairly disadvantage any other supplier or reduce the potential for future competition, for example by creating a technical solution that locks in the supplier's own goods or services.

3. CONFIDENTIALITY

Witham Group will protect all confidential and inside information regarding Witham Group and its subsidiary companies. Suppliers are expected to comply with the provisions in their contracts (including NDA) and any legal requirements to protect sensitive information. Suppliers to Witham Group may also be party to confidential information that is necessary for them to be effective partners. This information, even if it is not covered by contractual provisions, should be handled with the same care as information of similar sensitivity in the supplier's own organisation.

4. INFORMATION SECURITY

Witham Group is committed to promoting, supporting and enforcing sound practices that will ensure the confidentiality, integrity, and availability of Witham Group's information, data and systems. It is essential that suppliers safeguard the integrity and security of their systems and comply with the relevant Witham Group Privacy Policy standards. Suppliers must inform Witham Group without undue delay if they become aware of any information security incident that affects or has the potential to affect Witham Group data. Suppliers will respect intellectual property rights and will conduct technology and knowhow transfers in a manner protecting intellectual property rights. .

5. MANAGEMENT OF RISK

We look to our supplier to ensure risk is placed with the party best able to manage it. All parties should also be prepared to share intelligence of supply chain risks, so that material commercial and operational risks can be mitigated. Witham Group is committed to maintaining compliance with a framework to identify, assess and facilitate the management of business risks effectively, consistently and in line with the company's risk appetite. Our Risk Management Policy underpins this methodology and is applicable to all parts of Witham Group's wholly owned business activities, in both the UK and Overseas.



6. HEALTH & SAFETY

Witham Group has SAFETY as one of its Core Values and is committed to ensuring the health, safety and wellbeing of all colleagues, customers and others who visit or work on our premises. We maintain the quality of our health & safety at work controls through communication and the raising of awareness. Suppliers must comply with all applicable safety and health laws and regulations, and identify, evaluate and control worker exposure to safety and health hazards, including chemical, biological, physical and ergonomic stressors, through proper design, engineering controls, maintenance, safe work procedures and ongoing health and safety guidance.

Suppliers will implement procedures to prevent, manage, track and report occupational injury and illness, including encouraging worker reporting, classifying and recording cases, providing medical treatment, investigating cases, implementing corrective actions and facilitating workers' return to work.

7. PROFESSIONAL BEHAVIOUR

We expect suppliers to be prepared to invest in their relationships with Witham Group and establish trust with our staff and with other suppliers involved in delivery.

We also expect suppliers to be able to speak out when internal staff or other suppliers are not upholding the values of Witham Group. We also expect suppliers to speak out, without fear of consequences, when a project or service is unlikely to succeed because of our behaviours or a lack of good governance. We expect the same behaviour when a contract is no longer fit for purpose.

8. EQUALITY

Witham Group has EQUALITY as one of its Core Values and is an equal opportunity employer, committed to inclusion and diversity. We believe every one of our remarkable colleagues should feel comfortable being themselves and experience a culture that's inclusive and diverse, a place where we understand and respect each other's differences, where everyone feels they are valued and that they belong. We help create a safe space for colleagues to speak out and share their views. We're clear that any form of discrimination, bullying, harassment or victimisation will not be tolerated in any part of the business.

Suppliers must comply with all applicable human rights and employment laws in the jurisdictions in which they work and have robust means of ensuring that the subcontractors in their supply chain also comply. Suppliers will not use or permit any form of forced, bonded or indentured labour. All work must be voluntary, and all workers must be free to terminate their employment at any time.

Suppliers will not hold workers' identity, immigration or work permit documents longer than reasonably necessary for administrative processing. As part of the hiring process, suppliers are expected to give each worker a written agreement describing the worker's terms of employment in a language understood by the worker and, if internationally relocating, the written agreement will be provided before they leave their country of origin. This includes complying with the provisions of the Modern Slavery Act 2015. a lack of good governance. We expect the same behaviour when a contract is no longer fit for purpose.

Our staff and service users have the right to respectful treatment. We will not tolerate discrimination, harassment or victimisation in the workplace, and we expect our suppliers to provide the same commitment, including to their own employees. The Equality Act 2010 protects against discrimination, harassment and victimisation.



9. SUSTAINABILITY & WORKING TO HELP THE ENVIRONMENT

SUSTAINABILITY is one of our company's Core Values and our aim is always to operate within a climate of excellence. That means not only the best performing products and service but also our methods of manufacturing, energy use, waste disposal, packaging, fuel efficiency and welfare of those affected by our activities are being constantly monitored. As part of our commitment to put the environment at the heart of what we do, we have developed an award-winning range of Environmentally sensitive products, all designed to help reduce lubricant impact and also are investing in unique, award-winning technology to drastically reduce our carbon footprint.

We expect our Suppliers to comply as a minimum with all environmental, waste disposal, packaging, transport and energy related legislation and, wherever feasibly possible, have their own practices and procedures in place to help continually improve and reduce any impact their business may have on the environment.

10. CORPORATE SOCIAL RESPONSIBILITY

We expect our suppliers to be good corporate citizens. By upholding the values of this code and supporting corporate social responsibility policy areas, such as diversity and inclusion, sustainability, prompt payment, small and medium sized enterprise engagement, apprenticeships and skills development.

We expect our suppliers will cooperate with any information requests or audits that we may initiate to confirm their fulfilment of these responsibilities.

Though we seek to work with suppliers to improve conditions, we may terminate our relationship with any supplier that fails to meet these responsibilities.

11. COMPLIANCE

The overall objective of this Supplier Code of Conduct is to drive improved performance by building trusting and open relationships with our supply base.

Suppliers who provide goods or services are expected to comply with all aspects of this code. Suppliers should be open and transparent with Witham Group in relation to breaches or suspected breaches of this Supplier Code of Conduct and should promptly notify Witham Group immediately of any such breach.

If non-compliance with the requirements of this code is reported or alleged, the first step is for Witham Group to discuss it with the respective supplier. If that does not result in a return to compliance, or in cases where the breach is sufficiently grave, Witham Group will take appropriate steps in accordance with contractual obligation to bring the engagement to a close and thus preventing further harm.





MODERN SLAVERY ACT 2015 - COMPANY STATEMENT

SLAVERY AND HUMAN TRAFFICKING TRANSPARENCY STATEMENT FOR THE FINANCIAL YEAR ENDING MARCH 2022

This Statement is made pursuant to Section 54 (Part 6) of the Modern Slavery Act 2015 ('Act') and sets out the steps that Witham Group has taken during the previous financial year to ensure that slavery and human trafficking is not operating within either its own business or its supply chains.

COMPANY OVERVIEW

Trading since 1921, Witham Oil and Paint Ltd is a privately owned business which owns two subsidiary trading companies, Witham Oil and Paint (Lowestoft) Ltd and Witham Oil and Paint (Soham) Ltd. These businesses are collectively known as The Witham Group.

The Witham Group is a manufacturer of high quality oils and lubricants to a variety of industries, specialising in products for agriculture, automotive, marine, haulage, engineering and plant machinery. In addition we supply related ancillary products such as Anti-Freeze, Cutting Fluids, Greases and industrial Cleaning Products, together with lubricant storage tanks.

The Witham Group is also a manufacturer of high quality Paints and Coatings products, providing industrial finish paints, floor paints, marine paints, undercoats and primers, decorative paints, wood coatings, preservatives and finishes.

WITHAM GROUP CORE VALUES

Witham Group strives to ensure that it does not contribute towards adverse human rights impacts through its supply chains. There is an ongoing commitment to engage only those suppliers that uphold the same principles as Witham Group and where necessary ensure the implementation of corrective action measures. In the event that suppliers fail to take steps to cease or prevent adverse human rights impacts, Witham Group will reconsider its business relationships with those suppliers.

SUPPLY CHAIN MANAGEMENT

Witham Group sources a wide range of goods and services from suppliers based in the United Kingdom and some overseas. In all of its dealings with those suppliers it strives to ensure that the highest ethical standards are reached at all times. As part of this ongoing requirement, there will be increased focus on the requirement for a long-term commitment by those suppliers to eradicate slavery and human trafficking in their own businesses and supply chains.

INTERNAL AUDITING

An initial audit of all Witham Group direct suppliers has presented us with no immediate concerns. The vast majority of those suppliers are based in the United Kingdom or Central Europe and have been assessed as posing minimal risk in terms of non-compliance with the Act.

SUPPLIER SELECTION

Our Operation Director continues to select and collate and review this data.

WITHAM GROUP'S CONTINUED COMMITMENT

Witham Group recognises the importance of maintaining constant vigilance to identify and address any impacts associated with slavery and human trafficking throughout its supply chains. In recognition of the salience of these issues, Witham Group is committed to continuing to enhance its capacity to identify, prevent and mitigate any actual or potential impacts in this field.

APPROVAL BY WITHAM GROUP BOARD OF DIRECTORS

I, Nigel R Bottom, hereby certify that the information contained in the above Slavery and Human Trafficking Transparency Statement is factual and has been approved by Witham Group Board of Directors.

Signed:

Name: Nigel R Bottom

Position: Group Managing Director, Witham Group

Date: March 2021

