

SLAVERY & HUMAN
TRAFFICKING STATEMENT
2017



It's all about you.



Slavery and Human Trafficking Statement

The Modern Slavery Act 2015 (MSA 2015) focuses specifically on the issue of modern slavery to ensure offenders are suitably reprimanded with severe sentences. Modern slavery encompasses the offences of: 'slavery' where ownership is exercised over a person; 'servitude' which involves the obligation to provide service imposed by coercion; 'forced or compulsory labour' involves work or service exacted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily; and 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

The MSA 2015 requires large businesses, with sales of over 36 million, to be transparent about their efforts to eradicate Slavery and Human Trafficking. This statement therefore explains the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or any part of our business.

The organisation is composed of

- Operational departments in Sales, Service and Parts
- Supporting departments of Finance, Administration, Marketing and Human Resources.

We have policies in place internally, which are available to all staff and these can be accessed by third parties on request, simply contact Human Resources for a copy. Our policies are reviewed annually by the Human Resources department to ensure we remain compliant.

As part of the induction process and throughout workers' employment with us, we train all staff to treat others with respect and courtesy as well as ensuring they adhere to all relevant laws, regulations and standards. This is an ongoing due diligence process. We offer a training and development program for all staff from the ground floor through to management. We focus on ensuring our management team is not only aware of the requirements to be alert to modern slavery but can also address concerns raised by their team or any suppliers. If any worker is found in breach of our policies, we ensure suitable disciplinary action is taken which can include termination.

In relation to our supply chains, we use our reasonable endeavours to conduct risk assessments of the third parties we work with and investigate, where feasible, the working conditions of their workers.

As part of our risk assessments, we have not identified any possible risk of slavery and human trafficking either in the business or our supply chain. We aim to work with our colleagues and suppliers to ensure collaboration to remedy or mitigate any such risks that may exist now or in the future.



We allow all individuals who work or provide services to us the right to freely choose employment and, the right to associate freely with other individuals. Workers are free to choose whether to join a trade union or not and as a result of our training, we offer an environment which is free from harassment and unlawful discrimination. We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation. We do not engage in forced or involuntary labour and have a zero tolerance approach to the same, meaning we do not tolerate any of our suppliers engaging in such conduct. We require suppliers to certify that they do not participate in any forced or involuntary labour with their workers, subcontractors, agents or associates.

We aim to ensure that our performance indicators do not put pressure on or influence any modern slavery risk.

We do not believe our KPIs make our business and supply chain vulnerable to modern slavery.

We will continually review risk assessments in connection with this statement and legislation at Director Level to ensure continued compliance and awareness.

Date: 24th January 2017