



## **Modern slavery statement for financial year 2019/20**

JCB Medway Limited is a private limited company incorporated in England and headquartered in Gillingham, Kent. We operate three subsidiaries within England, as follows; SE TPS Limited, JCB Medway TPS Limited and Euro Van Hire Limited.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that JCB Medway Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

JCB Medway Limited understands that modern slavery encompasses slavery, servitude, human trafficking and forced labour. JCB Medway Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our business

We are a dynamic, family run and progressive organisation operating within the motor industry. We work with Brands who are reputable, with strong customer and employee focus. These brands are in the main part of the Volkswagen Group United Kingdom Limited ("VWGUK"), however we also represent brands outside this portfolio including Citroen, Fiat, Mercedes-Benz, Mitsubishi, Kia and SsangYong. In addition to this, we operate two multi-brand used commercial vehicle franchises; Euro Commercials. We have 17 sites across Kent, Sussex and Essex with approximately 450 employees and have been operating since 1998.

### Our high-risk areas

We do not have any high-risk areas with regard to modern slavery, however we do review our policies and processes in regards to modern slavery.

### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Dignity and Diversity policy. Ensuring our employees and managers are conducting business in an ethical manner toward both customers and employees.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

3. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

#### Our suppliers

JCB Medway Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light

#### Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

#### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

#### Approval for this statement

This statement has been approved by the Group Managing Director on 18<sup>th</sup> March 2019.



Jonathan C. Bischoff  
**Group Managing Director**  
**JCB Medway Limited (Registered Company)**