

## CORPORATE POLICIES AND PROCEDURES

<b>SUBJECT</b>	Slavery and Human Trafficking Policy
<b>FUNCTIONAL AREA</b>	Human Resources
<b>DATE</b>	September 2018
<b>REVISION</b>	3

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 policy therefore explains the steps we have taken 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 10 dealerpoints across South Wales and South West England with numerous supply chains. 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.

As part of the organisation's 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 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 of employment.

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.

Whilst recognising the company's statutory obligation, the business acknowledges that it does not control the conduct of individuals and organisations within its supply chains. We therefore require suppliers to certify that they do not participate in any forced or involuntary labour with their workers, subcontractors, agents or associates.



Billy Nairn  
Managing Director