

SLAVERY & HUMAN  
TRAFFICKING STATEMENT  
2023

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*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 Vehicle Sales, Service/Repair and Parts;
- Supporting departments of Finance, Sales Administration, IT, Property, Marketing, Purchasing and People & Learning Academy

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

As part of the induction process and throughout employment with us, we inform our colleagues to treat everyone with respect and courtesy in line with our company values and ensure they adhere to all relevant laws, regulations and standards. We endeavour to ensure 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 anyone is found in breach of our policies, we ensure the appropriate action is taken.

We have identified three high risk areas within our business; these are sub contract suppliers of valeting, cleaning and security services. These risks are mitigated as follows;

- Contracts are negotiated and managed centrally;
- Only reputable suppliers are appointed who have similar controls in place as Hendy Group;
- Charges are reviewed to ensure they are not unrealistically low in relation to the statutory national living wage;



### **Effectiveness**

As we have a zero tolerance approach to modern slavery, and have not identified any indications that it occurs in our supply chain, we have not adopted any specific performance indicators. However, our ongoing work with our suppliers should indicate if any of them are not implementing appropriate measures and we will 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. Colleagues are free to choose whether to join a trade union. We aim to create a working environment free from harassment and unlawful discrimination and 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.

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

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

Sarah Martyn  
**Group People Director**

Mark Busby  
**Commercial Director**

Date: 19 June 2023