

# Modern Slavery Statement

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## 1. Introduction

The Modern Slavery Act 2015 came into effect on 29th October 2015. This law requires manufacturers and retailers doing business in the UK, which supply goods or services and have an annual turnover exceeding £36 million, to disclose information regarding their policies to eradicate slavery and human trafficking from their supply chain and within their business.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our principles reflect our commitment to acting ethically and with integrity in all our business relationships, and to implement and enforce effective systems and controls to help eradicate slavery and human trafficking.

Hartwell plc has a zero tolerance policy towards violation of the laws banning forced labour, slavery and human trafficking. Contractual agreements permit the termination of suppliers for a single violation.

## 2. Our business and supply chains

Hartwell plc comprises, (10) dealerships and a number of subsidiaries including Hartwell Finance Ltd and Hartwell Automotive Group Ltd. The dealerships represent the following marques: Ford, Seat, Fiat and all sites located are geographically in the UK.

The Group's principle activities include vehicle distribution, sales, service and associated activities, property developments and investment. Hartwell Finance provide finance for hire purchase and leasing of motor vehicles and provision of Insurance products to the motor trade and regulated by the FCA.

Hartwell is dedicated to providing its employees with a positive working environment, which complies with, or exceeds, the requirements of all applicable legislation including human rights, anti-discrimination and fundamental rights at work.

We adopt a stringent procurement process. Suppliers are reviewed and audited to ensure they adopt adequate policies, which meet, or exceed, Hartwell's purchasing requirements. Site visits may also be undertaken to check on working practices, and/or compliance with Health & Safety. External agencies that work within a legislated working capacity, will advise Hartwell plc of any breaches that need to be investigated and escalated.

Notwithstanding the steps Hartwell plc takes in this regard, it is ultimately our suppliers' duty to respect the applicable laws and ethics on human rights.

### 3. Policies on modern slavery

The rules and procedures by which we treat fellow employees include:

- Transparent and fair behaviour, such as protecting human rights.
- Compliance with legislation, including fundamental rights at work, in particular, elimination of discrimination throughout employment.
- Procedures and training requirements to raise awareness to all staff
- The Annual Compliance Monitoring Plan checks the embedding of these standards/rules.
- Code of Ethics – as detailed on the Website.
- “Dignity” in-house training course for all employees.
- Associate handbook – issued to all staff on induction.
- Hartwell Plc ensures that areas of their business are compliant with their Code of Ethics and Human Rights standards and that all employees are treated in a fair and transparent manner. This includes adherence to the working time directive and the minimum wage.
- Employees’ and supplier employees’ rights are respected and valued at Hartwell and this is reflected in the Code of Ethics and the staff handbook, which reiterate Hartwell’s commitment to:
  - Health and Safety
  - Working Conditions
  - Equal Opportunities & Diversity

### 4. Due Diligence processes

All suppliers within the chain are required to provide evidence of their commitment to tackling modern slavery by completing questionnaires. This ensures visibility and enables all responses to be reviewed in line with Hartwell’s expectations. The due diligence of modern slavery legislation should be measured as part of our “Key Risk Indicator” (KRI) matrix.

We will be seeking confirmation from key suppliers of the Group that they have implemented contractual arrangements, which prohibit modern slavery and trafficking and seeking confirmation that they have adopted their own anti-slavery and human trafficking policies.

## 5. Risk Assessment

The modern slavery risk assessment should be reviewed annually. A specific risk has been identified and evaluated to meet the requirements of this legislation. This will be monitored via the group risk register and will be part of the quarterly Compliance & Audit Committee.

## 6. Training for Staff & Measuring effectiveness

Training staff through awareness by communicating through emails, presentations, posters and suitable E-learning modules. The staff Whistleblowing procedure offers further assistance in combating modern slavery, as it enables employees to bring issues such as slavery and human trafficking to the company's attention by utilising an agreed process.

Training via an E-learning platform, will be important to underpin knowledge. A number of Q&A tests will be set to check understanding.

To see our Statement on Modern Slavery access:

<https://tiscreport.org/>

Or: <https://www.modernslaveryregistry.org/>

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30<sup>th</sup> November 2018.

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..... March 2019

Signed by Group Finance Director..  ..... (Andrew Lemon)

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..... March 2019