

## **Modern slavery statement for the current financial year**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Struan Motors Ltd 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.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Struan Motors Ltd 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**

Struan Motors Ltd is composed of two car and Motorhome Dealerships situated in Perth and Dundee. We are a business that retails and services cars, light commercial vehicles and Motorhomes and we are largely supplied by main Dealer Manufacturers including Peugeot, Toyota and Mazda. New coach-built Motorhomes are supplied by Adria of Sudbury, Suffolk.

### **Areas of risk**

Whilst risks may exist in our recruitment practices and operational site management, the most significant risks remain in our material and subcontract purchases.

We source and sell a wide range of products from both national and international suppliers, making it difficult to conduct an examination into each and every seller in our supply chain.

As some of our staff are required to wear uniforms. The garment industry is often highlighted as having a high risk of modern slavery globally.

Our valet and building cleaning staff are subcontracted to a local-based valeting company and these roles often have a high staff turnover and a reliance of migrant workers.

### **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. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing/Public Disclosure 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.

4. 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.

#### Training

We aim to conduct training for our buying team 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 was approved by the Board of Directors on 6<sup>th</sup> December 2019

Name            John Robertson

Signature      *J Robertson*

Date            *6/12/2019*