

SAFTDWIN LTD

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT 2018

Introduction

This statement sets out Saftdwin Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year ending 31/12/2018.

As part of Motor industry the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Saftdwin Ltd & the Martins Group

- Saftdwin Ltd is a manufacture approved supplier of Volkswagen, Nissan, Renault, Dacia & Alpine new & quality used vehicles. We also offer Aftersales services including BodyShop accident repairs. We only deal directly and solely with our approved manufactures.

Countries of operation and supply

The Company currently operates in the following countries:

- We are located in the UK and only deal with suppliers located in the UK

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- We carry out an annual assessment of all our suppliers in accordance with the UK anti-slavery & human trafficking laws.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- None
- No high risk activities were detected in the last risk assessment

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows [select the relevant areas from the list below]:

- **Policies:** The Company secretary will ensure the implementation and continuous reviewing of policies and the process by which they were developed.
- **Risk assessments:** The Quality manager will carry out risk assessments and reviews will take place to ensure that the company's policies are adhered to and that our suppliers maintain best practises within the law.
- **Investigations/due diligence:** All senior management are responsible to monitor and carry out due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** This is supplied and processed by i2 Comply.com on an e-learning platform.

Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations [select the relevant policies from the list below]:

- **Whistleblowing policy** - The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** - The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** - The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship. This is monitored by our HR and quality control departments. We take a zero tolerance towards individuals or business that fails to ensure personal safety.
- **Recruitment/Agency workers policy** - The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. This is evaluated during the recruitment process.
- **[Any other policies relevant to the Company's business or sector]** Organisations may have other relevant policies to which they can refer, for example a corporate social responsibility policy, which should be accompanied by the steps taken to implement the policy and any examples where it has been used to address slavery and human trafficking risks.]

Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include [select the relevant actions from the list below]:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;

- evaluating the modern slavery and human trafficking risks of each new supplier [this may be part of a more general human rights or labour rights assessment];
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through and requiring them to implement action plans, proof of employment documentation and annual visits and meetings with the company directors to ensure transparency.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular communicating with all suppliers and promoting latest legislation & carrying out current training for all staff to highlight the best practise in identifying any vulnerable individuals.
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- using UK government available websites and information, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is [select the relevant KPIs from the list below]:

- Requiring all staff working for Saftdwin Ltd to have completed training on modern slavery by 31/03/2019.
- developing a system for supply chain verification expected to be in place by 31/03/2019, whereby the Company evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains by 31/12/2018 whereby the Company evaluates all existing suppliers.

Training

The Company requires all staff working within the Company to complete training on modern slavery.

The Company requires all staff members working in managerial positions to complete a number of training sessions that are being run from 01/11/2018 and complete an online training course by 31/03/2019.

The Company's modern slavery training covers [select the relevant training areas from the list below]:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company;
- what external help is available, for example through the Modern Slavery Helpline,;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.

Breaches of this policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Awareness-raising programme

- As well as training staff, the Company has raised awareness of modern slavery issues by distributing flyers to staff/putting up posters across the Company's noticeboards (NRM &MS1). The Home office website has also been made available on our HR platform

The posters explain to staff [select the relevant issues from the list below]:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Company; and
- What external help is available, for example through the Modern Slavery Helpline.

Board approval

This statement has been approved by the Company's board of directors as of 31/12/18, and will be review and update it annually.

Chief Executive's signature:



Chief Executive's name: Terry Handley

Date:

4th January 2019