

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Introduction

This statement sets out Parkway Derby Ltd's 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 2017/2018.

As part of the Automotive Retail & Repair 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 Parkway Derby Ltd:

Our supply chains include sourcing, sale and leasing of motor vehicles (predominantly Volkswagen), parts, consumables and provision of servicing, repairs, including vehicle body repair. Respecting human rights in the supply chain is ultimately our suppliers' responsibility however we will ensure that our expectations with regard to slavery and human trafficking are communicated to them.

Countries of operation and supply

The Company currently operates in the following countries:

- United Kingdom

As part of our initiatives to identify and mitigate risk: -

- Where possible we build long-standing relationships with suppliers and make clear our expectations of ethical business behaviour;
- With regard to supply chains, our point of contact is predominantly with a UK company/branch
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers

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:

- **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.

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- **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.
- **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.

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:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified;

Training

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

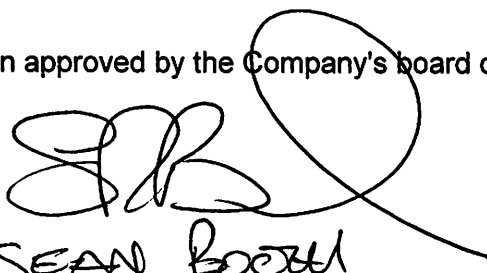
The Company's modern slavery training covers:

- 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,;

Board approval

This statement has been approved by the Company's board of directors, who will review and update it annually.

Director's signature:



Director's name:

SEAN BOOTH

31-3-2019