



T G Holdcroft (Holdings) Ltd Anti-Slavery & Human Trafficking Policy

As a group, T G Holdcroft (Holdings) Ltd and its subsidiaries maintains relationships with many different organisations in its supply chain, as well as employing directly significant numbers of people. The company reviews its existing compliance to the Modern Slavery Act 2015 (MSA) on an annual basis and where appropriate further measures are discussed and considered for implementation if they are deemed to enhance or improve upon the current levels of compliance.

1 Purpose of this policy

1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of T G Holdcroft (Holdings) Ltd with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

1.2 For the purposes of this policy "The Company" means any active subsidiary company of T G Holdcroft (Holdings) Ltd, which at the date of publication includes Holdcroft Renault Ltd, Holdcroft Honda Ltd, T G Holdcroft Motors Ltd, Holdcroft Nissan Ltd, Holdcroft Hyundai Ltd, ALM Garages Ltd & Holdcroft Properties Ltd and the policy shall specifically apply to these companies accordingly.

2 Steps for the prevention of Modern Slavery

2.1 T G Holdcroft (Holdings) Ltd is fully committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chains and requires the same standards from all of its suppliers. The company prohibits all areas of its business and supply chains from using slavery and human trafficking of any kind.

2.2 All of the company employees are provided with full details of our GDPR Policy, Business Code of Conduct, Whistleblowing Policy and other company policies, including this policy. These are provided on the company employee pay portal and all employees are encouraged to familiarise themselves with this information at induction and by regular email updates. The Code of Conduct specifically outlines ethical business practice as integral to all our dealings and our expectation of compliance with applicable laws is absolute.

2.3 Our main protection against slavery is to ensure that all business activity complies with minimum wage legislation, we also require this of all contractors engaged with our business. Our first line of defence against human trafficking is to ensure that all of their employees have the right to work in the UK. The company also requires that UK contractors only employ staff with the right to work in the UK.

2.4 The company will only trade with those who fully comply with its policy or those who are taking steps towards full compliance. If we are not satisfied with the steps being taken towards full compliance we will temporarily suspend business with that supplier (to the extent permitted under contract or by law). The ultimate sanction for the continual failure to comply will be for the company to cease to trade with that supplier (to the extent as permitted under contract or by law).

3 Responsibility for the policy

3.1 Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

3.2 Local site Departmental Management are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

4 Actions to report Modern Slavery or Human Trafficking

4.1 The company Whistleblowing policy is intended to provide guidance on how concerns can be communicated to the company.

4.2 Any instances of non-compliance of which the company is made aware will be assessed on a case-by-case basis. Remedial action will be taken and tailored to suit the circumstances.

4.3 The company will quickly and thoroughly investigate any claim or indication that any area of its business or supply chains is engaging in human trafficking or slave labour.

5 Communication and awareness of this policy

Our commitment to compliance of the Modern Slavery Act 2015 must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6 Review of this policy

This Anti-Slavery and Human Trafficking policy will be reviewed by the company's board of directors on a regular basis (at least annually) and may be amended from time to time.