



## **T G Holdcroft (Holdings) Ltd Anti-Slavery & Human Trafficking Statement**

This statement has been published in accordance with the Modern Slavery Act 2015 (MSA), during the financial year ending 31<sup>st</sup> December 2018 and aims to prevent modern slavery and human trafficking in our business and supply chains.

For the purposes of this statement “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.

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 operates new and used car franchised motor retail dealerships and service centres across Staffordshire, Cheshire and Greater Manchester and our principal activities concern the sale and servicing of automobiles.

We currently represent 9 new car manufacturers and operate from 23 dealerships, with 26 service centres, 1 accident repair centre and 1 vehicle leasing business centre. The company currently employs more than 640 people across these outlets.

The functions across the company businesses are very broad:-

- sells new and used vehicles
- arranges finance to enable customers to buy and lease vehicles
- provides vehicle aftercare including the servicing, MOT and repair of vehicles for both businesses and the general public
- sells parts and accessories to both retail and trade customers
- provides a suite of fleet management services to businesses in the public, private and third sectors
- carries out accident repairs;

The company staff policies raise awareness amongst its staff of its Anti-slavery and Human Trafficking Policy.

Along with its General Business Code of Conduct and Group GDPR Policy, this statement sets out the reasonable and practical steps which the company takes to ensure its standards are being implemented across its business and supply chains.

The steps taken by the company to prevent slavery and human trafficking:-

The company prohibits all areas of its business and supply chains from using slavery and human trafficking of any kind.

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.

Due to the breadth of its businesses and supply chains, the company is not in a position to check every business relationship and avenue. The principal areas in which there is a risk of human trafficking and slavery are those related to our supply chains. The company sources and sells products and parts from a broad range of national and international suppliers. To ensure that external supply chains comply with our policy the company requires that the business practices and supply chains of each supplier are in accordance with the MSA and we monitor compliance by suitable levels of due diligence according to the level of risk we assess of the potential for human trafficking and/or modern slavery.

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.

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).

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.

Any such claim coming to the attention of personnel within the company would be reported to senior management in accordance with our Whistleblowing Policy. The board of directors will be informed of the issue including the findings and outcome of the investigation.

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 statement. 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.

This statement has been approved by the board of directors of TG Holdcroft (Holdings) Ltd and its subsidiaries, who will review and update it as necessary on an annual basis.

Our full policy is available to view at <https://www.holdcroft.com/corporate-responsibility.aspx>

Mr Darren Holdcroft  
Managing Director



Date: 4<sup>th</sup> April 2019