

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out Hills Garages (Woodford) Limited'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 1 January 2022 to 31 December 2022.

As part of the new and used car sales 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 Hills Garages (Woodford) Limited.

- The business activities of the Company are new, and Toyota approved used car sales; new and used Lexus sales; and servicing and parts for Toyota and Lexus.
- The Company operates within the Essex area including Ilford, Epping and East London (Toyota and Lexus), and Southend and Chelmsford (Lexus).
- The Company's main supplier is Toyota / Lexus in the UK in respect of both cars and parts. The Company also sub-contracts body shop work to smaller suppliers.

Countries of operation and supply

The Company currently operates in the UK only.

High-risk activities

The Company considers that it performs no activities which carry a high risk of slavery or human trafficking:

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** The Financial Director is responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** The Financial Director is responsible for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** The Financial Director is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** The Financial Director is responsible for training directly within the Company to better understand and respond to any identified slavery and human trafficking risks.

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.
- **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's main supplier is Toyota / Lexus. It has a contract in place to ensure that both parties adhere to the highest standards of ethics. Where the Company deal with other suppliers such as small bodyshops or repairers, they 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 has introduced a supplier code of conduct, serious violations of which will lead to the termination of the business relationship; however, the majority of these smaller suppliers are sole traders. This will be uploaded to our BrightHR platform and be available to view in staff communal rooms.
- **Recruitment/Agency workers policy** The Company uses specified Toyota approved, reputable recruitment agencies to source labour. Alternatively, it undertakes recruitment itself via word-of-mouth or the use of Recruitment Revolution which posts vacancies to a variety of websites or various recruitment agencies; however, applications are sent directly to the Company. The risks of slavery and human trafficking are therefore considered to be low in this area.

Risk assessments

Risk assessments for Toyota / Lexus and our other suppliers are carried out weekly as part of our sitewalks.

Right to Work in the UK checks

Right to work and settled status are conducted for all new employees.

Due diligence

The Company regularly reviews its existing suppliers; it tends to use the same ones on a regular basis. The Company will undertake due diligence when considering taking on new suppliers including:

- evaluating the modern slavery and human trafficking risks of each new supplier (if applicable); this would be as part of a more general human rights or labour rights assessment;
- conducting supplier audits or assessments through the Company's own staff with a greater degree of focus on slavery and human trafficking if general risks are identified; and
- invoking sanctions against suppliers that fail to improve their performance in line with any action plan or supplier code of conduct introduced by the Company including the termination of the business relationship.

As noted previously, the majority of the smaller suppliers used are sole traders and therefore the risk of modern slavery and human trafficking is low.

Incidents in the previous financial year

No incidents of modern slavery or human trafficking were reported to the Firm within the previous financial year.

Training

The Company requires all staff working with suppliers to complete training on modern slavery.

The modern slavery training covers:

- 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, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to implement anti-slavery policies; and
- what steps the Company should take if suppliers or contractors do not implement anti-slavery policies, including their removal from the Company's supply chains.

Awareness raising programme

As well as training staff, the Company raises awareness of modern slavery issues by having posters and leaflets available on display in prominent staff locations; these are also available to view on our BrightHR platform.

These booklets and posters explain to staff:

- 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.

Key Performance Indicators

- Risk assessments for Toyota / Lexus and our other suppliers are carried out weekly as part of our sitewalks.
- Right to work and settled status are conducted for all new employees.

Board approval

This statement was approved on 12 May 2023 by the Company's CEO and Owner, who will review and update it annually.

CEO signature:



.....
Ashley Humphries

Date:

23 MAY 2023

Owner's signature:



.....
Rosanna Hill

Date:

23 MAY 2023