

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

As a company, Howards Motor Group maintains relationships with numerous different organisations in its supply chain and franchise relationships, as well as directly employing over 250 people. Howards Group has a zero-tolerance approach to modern slavery both within the Group and within companies with whom it does business.

We have reviewed our compliance and risk management processes following the introduction of the Modern Slavery Act 2015 to determine to what extent measures already exist and what further actions may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chains.

The policy outlined below underpins our approach and will be used to inform our annual Statement on Slavery and Human Trafficking going forwards. Our Code of Conduct states that Howards Motor Group respects fundamental human rights and is committed to the principles set out in the United Nations Universal Declaration of Human Rights. We support and respect the protection of human rights within our area of influence and in particular the effective elimination of compulsory labour and child labour.

The Code of Conduct governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. This Code of Conduct applies to all Howards Motor Group operations and employees. Howards Motor Group expect the equivalent standards of conduct from all persons acting on its behalf, such as suppliers and franchise partners. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can.

We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is summed up in two words – Zero Tolerance.

Chris Lee
Managing Director

January 2023

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BACKGROUND

Our organisation is composed of 20 car dealerships and two independent Used Car business situated across seven core geographical locations in Weston-super-Mare, Taunton, Yeovil and Dorchester. We are a business that retails and services cars, light commercial vehicles and Motorhomes and we are largely supplied by main Dealer Manufacturers including Peugeot, Citroen, Honda, Hyundai, Kia, Nissan, Toyota, Suzuki and MG.

PURPOSE OF THIS POLICY

Modern slavery is a criminal offence under the Modern Slavery Act 2015. 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 Howards Motor Group 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.

As a company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

STEPS FOR THE PREVENTION OF MODERN SLAVERY

We are committed to ensuring there is transparency across our whole business and in our approach to tackling modern slavery throughout our supply chains that is consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

Whilst recognising our statutory obligation to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations within our supply chains. However, we communicate with our suppliers in such a way as to convey to them our Anti-Slavery and Human Trafficking Policy and to gain an understanding of the measures they have taken to ensure modern slavery is not occurring in their businesses.

RESPONSIBILITY FOR THIS POLICY

We believe that responsibility for the prevention of modern slavery rests with the leadership of Howards Motor Group. The Board of Directors of Howards Motor Group has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers at all levels 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.

We have policies in place internally which are available to all staff and these can be accessed by third parties on request by simply contacting the Human Resources Department, Howards Peugeot, Searle Crescent, Weston super Mare, BS23 3YX, for a copy. Our policies are reviewed annually by our HR Department and legal advisors to ensure we remain compliant.

ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Employees are encouraged to raise any concerns about suspected modern slavery associated with the company or our suppliers and should do this either through their line manager or directly to the HR Department. As part of our induction process and throughout workers' employment with us, we train all staff to treat others with respect and courtesy as well as ensuring they adhere to all relevant laws, regulations and standards. This is an ongoing due diligence process. We offer a training and development programme for all staff and managers through all tiers of our organisation. We focus on ensuring our management team is not only aware of the requirements to be alert to modern slavery but can also address concerns raised by their team or any suppliers. If any worker is found to be in breach of our policies, we ensure suitable disciplinary action is taken which can include termination.

We aim to encourage openness within our organisation and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion of modern slavery in any form or that may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

The Group will accept and take seriously any concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Group's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published annually.

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