

## **Modern Slavery Act 2015 - Transparency Statement 2017/18**

This statement has been published in accordance with the Modern Slavery Act 2015, which requires businesses to disclose publicly the steps taken to tackle slavery, servitude, forced labour and human trafficking (together known as modern slavery).

### **Business structure and supply chains**

JCT600 is a privately owned Group, whose principle activity is the sale, service, hire, leasing and financing of new and used motor vehicles.

The Group employs 2200 people across 52 locations in the UK; with its Head Office situated in Yorkshire.

The Group represents 21 of the world's major vehicle manufacturers, trading through 48 franchised outlets.

The structure of the Group with centralised Finance, HR, Purchasing and Payroll functions enables the business to exercise strict control over the areas of concern detailed in the Modern Slavery Act 2015.

### **Policy relating to Human Trafficking**

We respect human rights and aim to positively promote and support the human rights of our employees, workers in our supply chain and others affected by our business. We are committed to preventing any modern slavery or human rights abuses in our business and supply chain. Alleged breaches of human rights will be investigated.

### **Business risk assessment**

The Group has adequate policies and procedures in place to ensure modern slavery and human rights abuses do not occur within the business.

- Centralised HR ensures compliance to all recruitment policies and procedures
- Centralised Payroll ensures all legislated pay scale regulations are complied with
- Centralised Health & Safety ensures all employees work in a safe environment
- An independent grievance procedure and whistleblowing procedure ensures adequate means to allow breaches to be investigated.

Due to the franchise nature of our business, the majority of our supply chain relationships are with a small number of large multinational vehicle manufacturers. The legal contracts in place contain specific policy clauses on the modern slavery act to ensure both businesses conduct their operations in line with the legislation.

Three high-risk areas of our business have been identified. These are sub contract suppliers of valeting, cleaning and security services. This risk is mitigated as follows:

- Contracts are managed centrally
- Only reputable suppliers are used who have similar controls in place to JCT600
- Charges are reviewed to ensure they are not unrealistically low in relation to statutory minimum wages.

## **Colleagues Awareness**

The Groups Handbook contains a Business Conduct Policy and a Whistle Blowing Policy.

The Business Conduct Policy provides guidance on the conduct that is expected from all our colleagues. A section of this policy provides specific guidance on Modern Slavery.

The Whistle blowing policy provides guidance on how concerns can be communicated to the company.

The company handbook is supplied to all colleagues on joining the business and is available on the companies Intranet.

Publish/Republish on Website every year within 6m of year-end