

ModernSlaveryStatement

Organisation

This statement applies to all companies within and associated to Motordepot Ltd/CarSupermarket.com (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year ending 2021.

Organisational Structure

We are an Automotive retailer, our Head Office and Business Support functions are based in Hull and we have 12 branches nationwide. In addition, we have two vehicle preparation centres, one based in Goole and the other Hull.

Motordepot Ltd/CarSupermarket.com, is part of the Aramis Group. The Aramis Group are a large car retailer in France which also represents brands Cardoen in Belgium and Clicars in Spain. Here in the UK we employ just over 450 people, mainly on permanent or fixed-term contracts. Other trading names included in the group are CarSupermarket.com, Best Car Buyer and InterestFree4Cars.

Definitions

The umbrella term "Modern Slavery" refers to situations of exploitation that a person is not able to refuse or leave because of threats, violence, deception and/or abuse of power.

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships including implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

- The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

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Supply Chains

In order to fulfil its activities, the group's main supply chains include those related to:

- Sourcing vehicles from UK based auction houses;
- Sourcing vehicles from UK based lease companies;
- Purchasing vehicles from customers as part of a part exchange offering;
- Purchasing vehicles directly from members of the public;
- Purchasing vehicle parts from UK based suppliers;
- Obtaining vehicle industry related goods and services from UK based companies;
- Obtaining building maintenance, refurbishment and valeting services from UK based companies.

Potential Exposure

We revisited our assessment from 2020 and the group concluded that its main exposure to the risk of slavery and human trafficking remains in its use of contractors to fulfil its activities, as they may not be fully compliant with legislation in the UK. We aim to continue to minimise this risk by requesting the completion of a contractor questionnaire and by ensuring we communicate a zero-tolerance approach to modern slavery.

We assessed the impact of the Covid-19 pandemic and we do not believe there was any effect or additional risk over that the main one identified in relation to contractors. We also assessed any effects from Brexit and concluded there were none.

In general, the group considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps

The group carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting an annual review of the controls of its suppliers.

The group has not, to its knowledge, conducted any business with another organisation which has been found to have been involved itself with modern slavery.

We believe combating modern slavery and working ethically starts with us and as such we have in accordance with section 54(4) of the Modern Slavery Act 2015, taken the following steps to ensure that modern slavery is not taking place:

- We extend our commitment to our suppliers by reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- Measures in place to identify and assess the potential risks in its supply chains;
- Embedding a culture of zero tolerance towards modern slavery;
- Raising awareness with our employees;
- Embedding the IR35 regulation within our processes

Key Performance Indicators

The group has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the group or its supply chains.

- All contractors are required to complete a contractor questionnaire both at the commencement of the contract and annually thereafter.

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- All employees are made aware of the Anti-Slavery and Human Trafficking Policy.
- We ensure that our employees have the right to work in the UK and also require our contractors to comply with our standards.
- All training is recorded.

Policies

The group has the following policy which further defines its stance on modern slavery:

- Anti-Slavery and Human Trafficking Policy

Training

The Group provides training which includes awareness of this Modern Slavery Statement and the groups Anti-Slavery and Human Trafficking Policy. We also have an e-learning awareness module for all staff to complete on commencements on their role and on an annual basis thereafter. This includes ensuring all staff can identify any issues and are aware of how to report them.

Slavery Compliance

The groups HR Manager holds responsibility for Slavery Compliance, to who all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regards to the group obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year

PLANS FOR 2022

We understand the importance of our employees understanding modern slavery and the red flags they should look out for to identify it. Therefore, to strengthen this awareness even further in addition to our current awareness communication we will continue to display a modern slavery awareness poster on all our employee information notice boards and will show all new employees the Gov.uk, YouTube video about modern slavery during their induction into the business.

Of course, we will continue to research good practice in relation to modern slavery awareness and prevention and will implement any new thinking/ideas throughout the coming year.

Date of approval: 3rd February 2022

Signed



Stephen Butterley
CEO

