Statement of ECM (Vehicle Delivery Service) Ltd in relation to the Modern Slavery Act 2015 relating to the financial period ending 2 April 2024

The Modern Slavery Act 2015 ("the Act") requires businesses in the UK which have an annual turnover exceeding £36 million to disclose information regarding their policies to prevent and eradicate slavery and human trafficking from their supply chain and within their business.

Introduction from the board of directors

We are committed to playing our part in preventing and eradicating modern slavery in supply chains.

Please find below our slavery and human trafficking statement made pursuant to section 54(1) of the Act.

Our business

ECM is one of Europe's leading providers of Finished Vehicle Logistics. Operating over 450 bespoke car transporters, ECM delivers 1 million vehicles per annum in the UK, on behalf of car manufacturers, importers, national sales organisations, and retailers.

Countries and regions in which ECM operates

ECM only operates in the United Kingdom. ECM does not provide vehicle logistics services outside of the United Kingdom. This significantly reduces the risk of non-compliance with the Act. We are, however, aware that there is always the possibility that our supply chains can be affected, and we will take all appropriate measures to consider our suppliers complying with the provisions of the Act as required.

ECM does not purchase any goods or services from outside of the European Union, and over 95% of all Goods and Services purchased by ECM are sourced from UK-based suppliers, and 100% from within the UK and European Union.

Section 1: The Act in relation to ECM's Supply Chain

1.1 Written policies and procedures

ECM strictly prohibits the use of slavery or human trafficking in its supply chains or in any part of its business. Our Supplier Sustainability Policy, which can be accessed via the following link http://www.ecmvds.co.uk/ecm-vehicle-delivery-service-ltd/company-policies/ reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing systems and controls to help prevent and ensure slavery and human trafficking is not taking place in our supply chains.

1.2. Due diligence processes

As part of our initiative to identify and mitigate risk, we have systems/processes in place to:

a) identify and assess potential risk areas in our supply chains

b) mitigate the risk of slavery and human trafficking occurring in our supply chains

c) monitor potential risk areas (if any) in our supply chains

d) protect whistleblowers

e) train staff to raise awareness, identify occurrence, and remove risk of modern slavery

1.3 Written Supplier Confirmation

ECM may ask a supplier to provide written confirmation in respect of their compliance with the Act.

ECM will not deal with suppliers who refuse to supply written confirmation of compliance with the Act, following our request.

1.3.1 New Suppliers

All new suppliers must complete a modern slavery based self-assessment to confirm if they comply/do not comply with ECM's supplier sustainability policy.

1.3.2 Subcontractor Self-Assessment

Subcontractor self-assessments were introduced in 2019 for selected subcontractors to identify and assess modern slavery risk.

1.4 Third party - Audits

ECM reserves the right to audit suppliers for compliance in respect of the Act.

1.5 Violations – Zero Tolerance

ECM has a zero-tolerance approach towards violations of the laws banning forced labour, slavery, and human trafficking. ECM will terminate all and any business conducted with suppliers who violate laws relating to the above.

1.6 Supply Chain – Risk Mapping

Our supply chain has been mapped to identify risks. This mapping involved analysing all goods and services by spend, country and product.

Section 2: The Act in relation to ECM Employees

2.1 Written policies and procedures

ECM's Contract of Employment with each employee details the agreements, rules and procedures by which ECM treats employees. Each driving employee is also issued a Quality Manual. We also have a Health and Safety Policy and a Code of Business Conduct. These documents include written policies and procedures in respect of:

- transparent and fair behaviour
- elimination of discrimination
- clearly defined and structured grievance procedures
- compliance with legislation, including fundamental rights at work
- health and safety

2.2 Employee Training

ECM conducts face to face training with its employees to emphasise the importance of acting with professionalism and integrity, and in line with ECM's following documents:

- *'Supplier Sustainability Policy'*
- *'Quality Manual'*
- *'Our Promise to Customers'*
- *'Our Corporate Philosophy'*
- *'Code of Business Conduct'*

Furthermore, each ECM driver undergoes 35 hours of 'Drivers Certificate of Professional Competence (D-CPC)' training per 5-year period.

http://www.ecmvds.co.uk/ecm-vehicle-delivery-service-ltd/promise-to-customers/

http://www.ecmvds.co.uk/ecm-vehicle-delivery-service-ltd/philosophy/

2.2.1 Modern Slavery Training

Training about slavery and human trafficking is available to staff. In 2023 all Carlisle staff and procurement officers were given refreshed training on modern slavery issues, how to spot the signs, high risk products and country risk profiles. Refreshed training is updated and delivered at least on an annual basis, with any new/major risks highlighted when they arise.

2.3 Human Rights

ECM adheres to the following laws and legislation which protect the well-being of our employees:

- Health and Safety legislation governing our business and industry
- Working Time Directive
- EU Drivers Hours regulations
- Minimum Wage regulations

2.4 Violations

ECM's disciplinary policy permits the termination of employees found to be involved in gross misconduct. A breach of the law banning forced labour, slavery and human trafficking would be classed as gross misconduct.

Section 3: Our effectiveness in combatting slavery and human trafficking

3.1 When entering into a contract with a new supplier, or renewing contracts with existing suppliers, we will, as appropriate, carry out checks and investigations, and will, if necessary, request further assurances to ensure, as far as possible, that we are effective in combatting slavery and human trafficking.

3.2 Our Directors are continuously involved in the assessment, checks and monitoring of any new contracts entered into with both new and existing suppliers.

3.3 We regularly review the effectiveness of the steps we have taken.

This statement has been approved by the board of ECM (Vehicle Delivery Service) Ltd on 14 March 2024

Allen Stuart
Company Secretary
14 March 2024
ECM (Vehicle Delivery Service) Ltd
The Airport
Carlisle
United Kingdom
CA6 4NW

Copyright ©: ECM (Vehicle Delivery Service) Ltd