# Slavery and Human Trafficking Statement for Border Holdings (UK) Ltd Holdings (UK) Ltd

## Financial Year Ended 30th September 2022 (1st October 2021 to 30th September 2022)

### Introduction

Border Holdings (UK) Ltd's (the Company) Slavery and Human Trafficking Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 "Transparency in Supply Chains". The Company is committed to preventing slavery and human trafficking in its corporate activities, and this Statement sets out the steps Border Holdings (UK) Ltd has taken to address the risk of slavery and human trafficking taking place within its own operations and supply chains.

**Our Organisation**

The Company is privately owned and has been in the same family control for over 40 years with family values, pride, encouragement and due reward of human endeavour at the heart of the business.

The Company conducts its business in a responsible manner which respects and rewards our employees, works with communities in which we operate, respects our trading partners, suppliers, customers and other stakeholders and ensures that our environmental impact in the areas we operate is minimised.

We must sustain the business through making profit, which in turn is used to support all other objectives.

**Business Sector**

The principal activity of the Company during the year was the manufacture and distribution of motor vehicle parts, farming and the provision of cold storage and warehousing facilities. The manufacture and distribution of motor vehicle parts ("Britpart") represents approximately 98% of the Company's turnover, representing over 330 employees engaged by the business.

*Farming and provision of cold storage facilities are subsidiary, wholly UK based activities that are considered to present zero material risk in relation to the Act.*

**Market Place**

Britpart has in excess of 800 customers worldwide and has established commercial partners throughout the world. Goods are distributed either by courier by our own delivery fleet in the U.K. Ireland and parts of Europe. Worldwide exports are handled by specialist freight forwarders and shippers.

**Supply Chain**

During the 12 months from 1st October 2020 to 30th September 2021 the vast majority of our automotive goods were purchased from OEM / Tier 1 suppliers in the U.K.

**Response to the Modern Slavery Act**

In response to the Act we have commenced a review of our Terms and Conditions, policies and procedures and have identified areas that would benefit from amendment in order to better reflect our stance on this issue. We are committed to implementation of the identified updates in the coming months.

**Risk & Due Diligence**

The type of products that we buy are not generally classed as being produced from high risk industries however we are aware that the instances of modern slavery and human trafficking are greater in certain geographical regions and as such the Company's due diligence includes the following:

- Evaluation of our suppliers by considering geographical area and volume of spend in relation to purchase orders raised to identify where an increased risk may exist.
- Inclusion of further checks into our supplier approval process to address this potential issue and to obtain further information / assurances where appropriate.
- Amendment of our Terms and Conditions of Purchase to include an anti-slavery / human trafficking clause.
- Evaluation of the modern slavery and human trafficking risks of each new supplier.
- Conduct regular supplier assessments with a focus on slavery and human trafficking.
- Invoking sanctions against suppliers that fail to improve their performance in line with an agreed action plan or seriously violate our supplier code of conduct.

**Continual Monitoring of Policy Effectiveness**

We do not have any key performance indicators specifically in relation to slavery or human trafficking as any instance would be expected to be a non-compliance and breach of employment laws, our employment practices, company policies and / or supplier standards. However, our supplier approval process is monitored under our internal and external (ISO9001) auditing framework, and the Company acknowledges that the effectiveness of our work in relation to modern slavery is an ongoing process.

Supplier responses that fail to meet our approval criteria will be highlighted and elevated to the Department Head for further investigation. Dependant on the outcome of further investigation, appropriate action will be taken that could include;

i. Liaison with supplier to agree corrective measures prior to / as a condition of trade
ii. Suspension or cessation of trade

Should significant or serious concerns become evident, these will be reported to the relevant authority under our whistleblowing procedure. Changes in policy will be reviewed regularly to measure effectiveness.

During the financial year the Company can report that there have been no recorded incidences of modern slavery across our business or supply chain, however we are not complacent and will continue to develop our systems to ensure we deliver a zero-tolerance approach across the business.

**Training**

We have briefed our Directors and also those individuals in roles most likely to be in a position to identify potential modern slavery risk including those working in Compliance, Human Resourcing and Purchasing.

We have also added a copy of the Modern Slavery Awareness & Victim Identification Guidance booklet, issued by the Home Office, to our HR software that is accessible by all staff.

Border Holdings (UK) Ltd is committed to take all practical measures necessary to ensure its trading partners operate ethically and meet basic working conditions standards and during subsequent years we will build on the work we have achieved this year and continue to develop our approach to the risks of modern slavery within all areas of our business operations.

**Signed** **Dated: 12th January 2022**



**Paul Moore-Myers**
**Managing Director**
**Border Holdings (UK) Ltd**