

HTC Group Limited

Modern Slavery Statement

Introduction

This statement sets out Heathrow Truck Centre Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 October 2021 to 30 September 2022.

As part of the Transport Services sector, the organisation recognises it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

Heathrow Truck Centre Limited has been established since 1986, and is a privately owned company under the Ballyvesey Holdings Limited parent company. The HTC Group's main activities are concentrated in HGV Truck & LCV Van sales with aftermarket support and spare parts sales from 9 UK locations.

Countries of Operation and Supply

The organisation operates in the United Kingdom.

We internally review our supply chain to evaluate human trafficking risks and slavery risks and we conduct supplier audits which review all aspects of the supply chain including safety, human trafficking, child labour and other legal requirements.

We have embraced the Stronger Together Programme across our sites, and support the work being done to reduce forced labour and human trafficking in the UK. Our HR Teams have been trained in the exploitation of human labour. Employees and agency staff have received training in the Stronger Together principles.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Human Resources Department
- **Risk assessments:** Group H&S & Management Team
- **Investigations:** Group Head of Finance & Group HR Manager
- **Training:** Human Resources Department

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** - The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact James Darragh on 07876741023.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;

- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular as evidenced by our participation in "Stronger Together" initiatives;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship [provide examples].

Performance indicators

The organisation has reviewed its key performance indicators in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring all staff working in procurement and HR to have completed training on modern slavery;
- reviewing its existing supply chains, whereby the organisation evaluates existing suppliers.

Training

The organisation's modern slavery training covers:

- our business's procurement practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through Stronger Together;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training specific staff, the organisation has raised awareness of modern slavery issues by utilising the Stronger Together portfolio of resources across the organisation's premises:

In addition, posters have been distributed to explain to staff:

- the basic principles of the Modern Slavery Act 2015;

- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and

Board approval

This statement has been approved by the organisation's Board of Directors, who will review and update it annually.

A handwritten signature in blue ink, appearing to be 'P. Jones', is positioned above the 'Managing Director's signature:' label.

Managing Director's signature:

Date:

23/12/2022