Modern slavery statement

Organisation
This statement applies to City West Commercials Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2020.

Organisational structure
The organisation is based in the United Kingdom and operates across four sites within the South West of England with its head office operating from Avonmouth, Bristol. It is primarily an automotive retailer and is a franchised Mercedes Benz Truck Sales and Truck and Van Aftersales dealer. The main activities carried out by the organisation is the sale of Mercedes Benz Trucks, FUSO Trucks, servicing and the supply of parts for both Truck and Van variants. Demand for our product is consistently high throughout the year and is therefore not seasonal. The organisation is controlled by a board of directors.

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

The Organisation 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 Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Supply chains
In order to fulfil its activities, the main supply chains of the Organisation principally include those related to the supply of vehicles and parts from the manufacturer we represent.

Potential Risk/Exposure
In general, the Organisation considers its exposure to slavery/human trafficking to be relatively low. 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.

Impact of COVID-19
During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.
Despite the permitted, delay, the Organisation remains in a position to publish its statement for the financial year 2020.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL RISK/ EXPOSURE' above.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Steps
The Organisation 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 a review of the controls of its suppliers.

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

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

The organisation makes clear expectations that all suppliers have suitable anti-Slavery and human trafficking policies and procedures in place.

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

- The effectiveness of the policy can be measured by the number of reports received from employees, official agencies or the public.

Policies
The Organisation has the following policies which further define its stance on modern slavery:

- Recruitment Policy – Includes eligibility to work in the UK checks
- Whistle Blowing Policy – Allows employees to report concerns without fear of reprisal
- Anti-Slavery And Human Trafficking Policy – States the organisations requirements and expectations
- Code of Conduct Policy – The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation

Slavery Compliance Officer
The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

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

Board Approval
The organisations board of Directors has approved this statement and will review and update it annually.

Darren Sweet
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City West Commercials Ltd

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