

18. MODERN SLAVERY STATEMENT

A. ORGANISATION

This statement applies to Watling JCB Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2024.

B. ORGANISATIONAL STRUCTURE

The Organisation is controlled by the Board of Directors and their Management teams throughout the business operation.

Our Board of Directors consist of talented Professionals who bring strong leadership and wide-ranging expertise and experience. They are dedicated to our principles and goals, and committed to strengthening and facilitating the growth of our business for the benefit of its Customers and Employees.

Regular Board meetings enable our business departments to review and broaden their own working objectives, consider and discuss anything that impacts on the people aspects of the business, including policies, business plans, new initiatives and all aspects of staff motivation and morale.

There are 8 Depots headed up by a Depot Manager, Leicester (Head Office), Peterborough, Kidlington, Leighton Buzzard, Wymondham, Stoke, Hereford and West Bromwich to offer a Parts, Aftermarket, Attachment and Sales provision to JCB Industry within our dedicated Depot territory areas.

Each Depot Manager is supported by their departmental teams and our Managers operate an 'open door' policy and there are many regular means of communicating strategy and tactics across all levels and functions right across the business.

The culture within our Organisation is predominantly Training and Development to retain and develop our talent to ensure we maintain our JCB World Leader title for excellence in Customer Service awarded to us at the recent JCB World Dealer Award Ceremony

C. DEFINITIONS

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.

D. COMMITMENT

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

Watling JCB Ltd 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 Watling JCB Ltd 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 United Kingdom.

E. SUPPLY CHAINS

In order to fulfil its activities, Watling JCB Ltd main supply chains include those related to the Construction, Agricultural, Compact, Heavy Line, Waste & Recycling and Power Generators Industries and we understand that Watling JCB Ltd first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

F. POTENTIAL EXPOSURE

Watling JCB Ltd considers its main exposure to the risk of slavery and human trafficking to exist.

In general, Watling JCB Ltd considers its exposure to slavery/human trafficking to be minimal, however, we have taken steps to ensure that such practices do not take place in our business nor the business of any organisation that supplies goods and/or services to it.

G. STEPS

Watling JCB Ltd 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.

Watling JCB Ltd 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, Watling JCB Ltd regularly takes the following steps to ensure that modern slavery is not taking place:

- Review of 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;
- undertake impact assessments of its services upon potential instances of slavery;
- create action plans to address risk to modern slavery;
- any actions taken to embed a zero tolerance policy towards modern slavery;

H. KEY PERFORMANCE INDICATORS

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

- Requiring staff to complete training on modern slavery;
- Developing a system for supply chain verification; and
- Reviewing their existing supply chains.

I. POLICIES

Watling JCB Ltd has the following policies which further define its stance on modern slavery:

- Statement of Expectation Policy
- Environmental Safeguarding Policy
- Social Responsibility Policy
- Ethical Working Code Policy
- Whistle-Blowers

- Equal Opportunities Policy
- Personal Harassment Policy and Procedure
- Data Protection Policy
- E-Mail and Internet Policy
- Smoking Policy
- Health and Safety Policy
- Work Wear Policy
- Site Traffic Policy
- Traffic Management Policy
- Telematics Policy
- Anti-Bribery and Corruption Policy
- Proceeds of Crime (Anti-Money Laundering) Policy
- Substance and Alcohol Misuse Policy
- Remote Working Field Service Engineer Policy
- Confidentiality Policy
- Reporting Lost/Stolen Equipment Policy
- Expenses Policy

J. SLAVERY COMPLIANCE OFFICER

Watling JCB Ltd 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 Watling JCB Ltd obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

For a signed copy of this statement please contact our Leicester depot.