

Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”), and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2022 (“FY2021”).

Our company

Norton Way Motors Ltd (the “Company”) is owned by Marubeni Corporation and Marubeni Europe plc who in turn is a wholly-owned subsidiary of Marubeni Corporation, one of Japan’s largest trading and investment companies. The Company is headquartered in Letchworth Garden City, Hertfordshire.

The Company is a Multi Franchise Motor Dealer Group operating in the UK.

We supply New & Used vehicles into both the Retail and Commercial sectors. We also provide Servicing, Bodyshop facilities & Parts Provision.

Our principles and values

It is the Company’s policy that management and employees must comply with the highest standards of business and ethical conduct in all dealings with customers, suppliers, government officials and the wider community.

The Company’s core values, in common with all companies in the Marubeni Group, are fairness, innovation and harmony.

Our supply chains

The Company operates in partnership with seven Global Motor Franchise Partners as an authorised franchisee.

We also sell the products directly to the customer, Business to Business or through a distributor network. We provide services including Finance and the sale of General Insurance products and we are fully authorised by the Financial Conduct Authority (FCA).

Relevant policies

The Company is committed to taking steps where reasonably practicable to ensure that modern slavery is not taking place in any part of its own business or in any of its supply chains.

We would also draw attention to the Basic Supply Chain Sustainability Policy of our parent company Marubeni Corporation, established in October 2008 (and subsequently amended).

In January 2019, Marubeni Corporation published the Basic Policy for Human Rights which sets our commitments based on the UN's Governing Principles on Business and Human Rights.

Other relevant policies of the Company are its Anti-Corruption Policy and its Business Conduct Policy.

The modern slavery risks

Adopting the Modern Slavery Policy was a first step towards the Company having in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- monitor potential risk areas in our supply chains.

We recognised that modern slavery may exist to a greater or lesser extent in most if not all countries and in most industries. Given the diverse range of our business activities and the number of countries into which our supply chains extend, it would be reasonable to assume that the Company must therefore be at risk in respect of modern slavery to some extent.

Marubeni Corporation distributed guidelines to relevant group companies to assist them in efforts towards the prevention of human rights violations in their own businesses and in their supply chains.

Having considered these guidelines, the Company has established a methodology for the assessment of risk of human rights violations. Whilst we have no information to suggest that modern slavery exists in any of our supply chains, our initial analysis suggests that certain businesses or product lines may represent a higher degree of risk, and accordingly may require more detailed analysis and investigation.

Specific steps already taken

- Held a training Seminar with Directors & Key Senior Managers to inform them of the information.
- Circulated training literature to staff & continue to update all staff on the subject & encourage them to use the Modern Slavery Helpline if required.
- Our Modern Slavery Statement & Policy has been sent to our suppliers.
- We continue to attend seminars held by stronger2together.org
- We receive regular updates from the Office of the Anti-Slavery Commissioner & utilise information & data from the Anti-Slavery Partnership toolkit.
- We prepared & delivered further training for all members of staff in FY 2021.
- We continue to look for innovative ways to heighten the awareness of the Modern Slavery risk within our Company.

In driving the performance of the business

Individual contracts very often contain performance and delivery conditions. However, our initial review would suggest that we have not established, in respect of any particular supply chain or business and whether for internal use or for our suppliers, any formal performance incentives or indicators of the type that may unintentionally increase pressure on those who are producing the goods to a level which might in turn create an environment where acceptable labour standards are compromised.

Internal organisation in relation to modern slavery

We have a dedicated Senior Management Team that reports to the Managing Director, who has overall responsibility for the Company's response to the challenge of slavery and human trafficking and, in accordance with the requirements of the Act, has signed this Statement below.

Effectiveness

As a result of the steps taken, we are confident that the risks of modern slavery taking place in our business or supply chains are now significantly reduced

This Statement relates to the Company's financial year ended 31 March 2022

Signed

Managing Director – David Grainger

Dated 29th September 2022