

Modern Slavery and Human Trafficking Statement

INTRODUCTION

Modern slavery remains a grave violation of fundamental human rights and a criminal act. It encompasses various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking. These forms all share a common element and the deprivation of an individual's liberty, undertaken by another, for personal or commercial gain.

At Barlow Motors Plc, we steadfastly maintain a zero tolerance approach towards modern slavery. We pledge to conduct our business ethically and with integrity, both in our internal operations and in our relationships with external partners. To achieve this, we diligently implement and enforce effective systems and controls to ensure that modern slavery does not take place within our organization or within our supply chains.

The Modern Slavery Act 2015 (the "Act"), along with its subsequent amendments, has strengthened UK law to enhance transparency in supply chains. Specifically, large businesses are mandated to disclose the measures they have taken to ensure that their operations and supply chains remain free from modern slavery. This statement outlines the steps we have taken and continue to take to ensure that slavery and human trafficking are eradicated from all our supply chains and business operations.

GOVERNANCE AND ACCOUNTABILITY

Barlow Motors Plc has established clear governance structures to ensure effective oversight of our modern slavery prevention efforts. We discuss quarterly reports on modern slavery risks, incidents, and mitigation efforts. Operations, meets quarterly to review policies, assess risks, and monitor compliance across our operations and supply chains.

GROUP POLICY

Barlow Motors Plc is dedicated to continuously improving our practices to combat modern slavery and human trafficking in all their forms within our organisation and supply chains. To prevent slavery, we ensure that all our business activities are in compliance with minimum wage legislation and the National Living Wage, and we expect the same from our contractors. We conduct comprehensive right-to-work checks for all employees and require evidence of legitimate employment practices from all contractors.

Our first line of defence against human trafficking is verifying that all Barlow Motors Plc Group employees have the right to work in the UK through robust document verification and eligibility checks. We also require UK-based contractors to employ only those individuals with the right to work in the UK and to provide evidence of their verification processes. We conduct regular audits to ensure ongoing compliance.

RISK ASSESSMENT

We conduct annual comprehensive risk assessments to identify potential modern slavery risks within our operations and supply chains. Our risk assessment considers geographic factors, industry sectors, business models, and specific operational characteristics. We have identified key risk areas including cleaning services, valeting services, uniform suppliers, temporary labour agencies, construction contractors, and suppliers operating in high-risk geographic regions.

Our risk assessment framework evaluates suppliers based on location, industry sector, labour intensity, use of subcontractors, and previous compliance history. Each supplier is assigned a risk rating (low, medium, high, and critical) which determines the level of due diligence and monitoring required.

OUR SUPPLY CHAINS

Given the scope of our operations and supply chains, it is not always possible to vet every business relationship thoroughly. However, we have identified the key risk areas for human trafficking and slavery, particularly within our supply chains, including cleaning services, valeting, and uniform suppliers. Barlow Motors Ltd sources products and parts from a wide array of national and international suppliers. Our supplier and contractor approval process includes a review of their adherence to controls, including their compliance with the Modern Slavery Act and related regulations. To ensure that external supply chains conform to this policy, we insist that the business practices and supply chains of each supplier align with Barlow Motors Ltd principles. We closely monitor compliance through varying levels of due diligence, dependent on the assessed risk of potential human trafficking and modern slavery.

Any instances of non-compliance that come to our attention will be assessed on a case-by-case basis. We will take remedial actions tailored to the specific circumstances. We will only continue trading with suppliers who are in full compliance with this statement, the Modern Slavery Act, and related regulations, or are actively working towards achieving full compliance. If we find that a supplier is not making satisfactory progress, we will temporarily suspend our business relationship, to the extent permitted by contract or law. The ultimate sanction for continuous non-compliance is the cessation of our business relationship, as allowed by contract or law. Barlow Motors is committed to swiftly and thoroughly investigating any claims or indications of human trafficking or slave labour within our business or supply chains. Personnel within Barlow Motors Ltd are encouraged to report such claims, following our Whistleblowing Policy. The findings and outcome of these investigations will be communicated to the board of directors.

REMEDATION AND ENFORCEMENT

Any instances of non-compliance that come to our attention will be assessed immediately by our Management and we will take remedial action tailored to the specific circumstances, prioritising the protection and support of any potential victims. Our remediation approach focuses on working collaboratively with suppliers to address deficiencies while maintaining our zero tolerance approach to non-compliance.

We will only continue trading with suppliers who are in full compliance with this statement, the Modern Slavery Act, and related regulations, or are actively working towards achieving full compliance within agreed timescales. Suppliers failing to demonstrate satisfactory progress within 90 days will face temporary suspension of business relationships. The ultimate sanction for continuous non-compliance is the permanent cessation of our business relationship, and report to law informant agencies.

Barlow Motors Plc is committed to swiftly and thoroughly investigating any claims or indications of human trafficking or slave labour within our business or supply chains.

GRIEVANCE AND REPORTING MECHANISMS

Personnel within Barlow Motors Plc, suppliers, contractors, and other stakeholders are encouraged to report any concerns regarding modern slavery through multiple channels. Our Whistleblowing Policy provides protection for individuals raising concerns in good faith. We operate a confidential reporting and accept anonymous reports through our staff grievance policy

All reports are investigated promptly and confidentially by our Operations Manager. And we are committed to protecting the identity of individuals raising concerns and prohibit any form of retaliation. Where potential victims are identified, we will provide appropriate support and cooperate fully with law enforcement agencies.

TRAINING AND AWARENESS

We ensure that all Barlow Motors Plc employees have access to comprehensive modern slavery training appropriate to their role and responsibilities. This includes detailed information regarding our Business Code of Conduct, Whistleblowing Policy, and this Modern Slavery Statement. Training materials are accessible via the Barlow Motors Plc employee portal and through regular face-to-face sessions.

Our training program includes role-specific modules for our staff, sales personnel, management, and operational staff. We provide annual refresher training for all employees and additional specialised training for staff in high-risk roles. Training effectiveness is monitored through assessments and feedback, with completion rates tracked and reported to our board of directors monthly.

MONITORING AND PERFORMANCE

Our monitoring program includes conduct annual self-assessments of our own operations and review our policies and procedures of our suppliers.

APPROVAL AND REVIEW

This statement has been approved by the board of directors of Barlow Motors Plc. We are committed to reviewing and updating annually to ensure compliance with the latest requirements of the Modern Slavery Act and related regulations, incorporating lessons learned and reflecting evolving best practices.