

Ballyvesey Holdings Limited

SLAVERY AND HUMAN TRAFFICKING STATEMENT (“Statement”)

Ballyvesey Holdings Limited and its subsidiaries (together “**Ballyvesey**”) fall within the scope of the Modern Slavery Act 2015 (“**Act**”). This Statement is published pursuant to Section 54 of the Act and sets out steps taken as part of its commitment to ensuring there are no acts of modern slavery or human trafficking occurring in its businesses or supply chains.

Ballyvesey Holdings Limited

Ballyvesey is the privately owned parent company of a wide range of trading subsidiaries. Established in 1970, the group’s main activities are centred around transport and logistics, truck sales and aftersales support, trailer manufacturing and spare parts sales, transport industry services, construction equipment sales, corporate services, property rental and development.

This Statement is made on behalf of the following entities:

- Heathrow Truck Centre
- Midland Truck and Van
- Intercounty Truck and Van
- West Pennine Trucks
- Sapphire Vehicle Services
- Commercial Vehicle Auctions
- Rockmount Vehicle Maintenance
- Montgomery Transport
- Montgomery Distribution
- Montgomery TankServices
- Montgomery Freight Management
- Major Freight Services
- Montgomery Customs
- Clemence Rogers
- Centurion Truck Rental
- Falcon Vehicle Solutions
- DGC
- DMC Trailers
- Montracon

- Contract Plant Rental
- TDL
- Sleator Plant
- Norwest Plant

Ballyvesey and its subsidiaries recognise their responsibility to take a robust approach to slavery and human trafficking in all its guises. The organisation is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.

Ballyvesey business units are committed to having systems and procedures in place to prevent modern slavery and human trafficking and to ensure that neither occurs within their supply chain network or in any part of their business.

Ballyvesey complies with all applicable laws and regulations as do its respective business units. Operating by ethical business practices, employees are treated with dignity and respect in what is classed as a neutral working environment that is safe and supportive. No form of modern slavery or human trafficking will be tolerated.

Ballyvesey undertakes due diligence when considering taking on new suppliers, and regularly reviews existing suppliers.

Due diligence reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- evaluating modern slavery and human trafficking risks of new suppliers
- reviewing all aspects of the supply chain based on supply chain mapping
- conducting supplier audits with a greater degree of focus on slavery and human trafficking where general risks are identified
- taking steps to improve substandard supplier practices, including providing advice to suppliers and implementation of action plans
- participating in collaborative initiatives around human rights in general, and slavery and human trafficking in particular, evidenced by Ballyvesey's participation with the "Stronger Together" initiative.

- invoking sanctions against suppliers that fail to improve their performance or seriously violate supplier code of conduct, including the termination of the business relationship where evidence of modern slavery is identified e.g., use of child labour, bonded labour or debt labour and unlawful recruitment to name but a few.

Performance indicators

Ballyvesey has reviewed its key performance indicators considering the introduction of the Modern Slavery Act 2015.

As a result, Ballyvesey:

- requires all staff working in procurement and HR to have completed training on modern slavery and RTW in the United Kingdom
- developed a system for supply chain verification, whereby business units evaluate potential suppliers before they enter the supply chain; and
- reviews its existing supply chains, whereby the organisation evaluates all existing suppliers.

Training

Ballyvesey'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 Ballyvesey 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, Ballyvesey has raised awareness of modern slavery issues by utilising the Stronger Together portfolio of resources across the organisation's business units:

In addition, posters have been distributed to inform and to highlight to staff, customers, suppliers and or visitors to site

- 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

Ballyvesey is committed to ensuring that neither it nor its supply chain is involved in modern slavery or human trafficking.

Board Approval

The board of directors of Ballyvesey Holdings Limited approved this Statement at its meeting of 27 January 2023 and this is Ballyvesey's Statement for the financial year ended 30 September 2022.

Signed for and on behalf of Ballyvesey Holdings Limited

Colin Montgomery

Chief Executive Officer