Walter E. Sturgess & Sons Ltd Slavery and Human Trafficking Statement Financial Year End 31/12/ 2022

The Modern Slavery Act 2015 (MSA 2015) focuses specifically on the issue of modern slavery to ensure offenders are suitably reprimanded with severe sentences. Modern slavery encompasses the offences of: 'slavery' where ownership is exercised over a person; 'servitude' which involves the obligation to provide service imposed by coercion; 'forced or compulsory labour' involves work or service exacted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily; and 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

The MSA 2015 requires large businesses, with sales of over 36 million, to be transparent about their efforts to eradicate Slavery and Human Trafficking. This statement therefore explains the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or any part of our business.

Organisation
This statement applies to Walter E. Sturgess & Sons Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2022.

Organisational structure
The organisation is composed of three retailing location across Leicestershire and our head office is in Leicester, Broughton Astley site.

The Sturgess Group is a family-owned and operated franchised motor retailer based in Leicestershire. The company represents Hyundai, Suzuki, and Fiat Group franchises in the city for vehicle sales and servicing and the sale of parts.

The labour supplied to the Organisation in pursuance of its operation is carried out in Midland's area only.

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 minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

Supply chains
In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of vehicles, parts, IT systems.

We understand that the Organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

Potential exposure
The Organisation considers its exposure to slavery/human trafficking to be relatively limited. 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.

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:

- Our colleagues are all provided with a written contract of employment as well as access to a company handbook which contains any policy that affects their employment. Each employee has a personal responsibility to read the handbook, as well as to ensure that they fully understand our obligations and the consequences associated with any breach of those obligations.
- We recruit only candidates that hold full right to work in the UK all of whom have provided us the evidence of the right to work.
- We ensure that our employees are paid at least National Minimum Wage or National Living Wage or more.

- The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- Managing Director and/or HR Department are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- We allow all individuals who work or provide services to us the right to freely choose employment and, the right to associate freely with other individuals. Workers are free to choose whether to join a trade union or not and as a result of our training, we offer an environment which is free from harassment and unlawful discrimination.
- We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation. We do not engage in forced or involuntary labour and have a zero-tolerance approach to the same, meaning we do not tolerate any of our suppliers engaging in such conduct.
- We require from our staff to complete a Modern Slavery training, and refresh it every three years.

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.

We will use the following key performance indicators to assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- records of staff training (number of staff trained / informed);
- number of reported suspicious situations;
- measures in place to identify and assess the potential risks in its supply chains.

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

- Whistleblowing Policy, which encourages employees and partners to raise concerns or disclose information, which relates to wrongdoing, illegal practices or unethical conduct, which may come to their attention through work (including concerns that may relate to modern slavery and human trafficking).
- Anti-corruption and Bribery Policy & Health and Safety Policy, which reflect our objective to act ethically and in line with our legal and regulatory obligations with regard to our employees.

These policies and documents will continue to be reviewed on, at minimum, an annual basis.

Slavery Compliance Officer
The Organisation has a Slavery Compliance function, which is run by the HR Department, 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.

Date of approval: 20/06/2023

Signed: 

Print name: Barnaby Sturgess

Job Title: Managing Director

Date: 20/06/2023