

Walter E. Sturgess & Sons Ltd Slavery and Human Trafficking Statement Financial Year End 31/03/2025

The Modern Slavery Act 2015 (MSA 2015) addresses the issue of modern slavery, ensuring offenders face severe penalties. Modern slavery includes the crimes of 'slavery' where ownership is exercised over a person; 'servitude' which involves the obligation to provide service imposed by coercion; 'forced or compulsory labour' where work or service is exacted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily; and 'human trafficking' which involves arranging or facilitating the travel of another with a view to exploiting them.

Transparency in Supply Chains

The MSA 2015 mandates large businesses with annual sales over £36 million to be transparent about their efforts to combat slavery and human trafficking. This statement outlines the measures Walter E. Sturgess & Sons Ltd (referred to as 'the Organisation') has taken during the financial year to ensure that slavery and human trafficking are not occurring within our supply chains or any part of our business operations.

Organisation

This statement pertains to Walter E. Sturgess & Sons Ltd. The details included refer to the financial year 2024/2025.

Organisational Structure

During part of the 2024/2025 financial year, the organisation operated in three locations in Leicestershire. However, two of these locations were sold, and since December 2024, the company has been based in a single location at Cropston Road, Anstey, Leicester. The company is a family-business specialising in the sale and repair of used cars. All labour for the organisation's operations is sourced exclusively from the Midlands area.

Definitions

The Organisation defines modern slavery as encompassing:

- human trafficking;
- forced labour through mental or physical threat;
- being owned or controlled by an employer through mental or physical abuse or the threat thereof;
- being dehumanised, treated as a commodity, or being bought or sold as property;
- being physically constrained or having restrictions placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in addressing modern slavery and is committed to complying with the Modern Slavery Act 2015. This involves ongoing reviews of both its internal practices related to its workforce and its supply chains.

The Organisation does not engage in business with any entity, domestically or internationally, that knowingly supports or is involved in slavery, servitude, and forced or compulsory labour. No labour provided to the Organisation in the execution of its services is obtained through slavery or human trafficking. The Organisation strictly adheres to the minimum standards required under relevant UK employment legislation.

Supply Chains

To carry out its activities, the Organisation's main supply chains involve the procurement of vehicles, parts, and IT systems. We understand that our primary suppliers are intermediary traders who have further contractual relationships with lower-tier suppliers.

Potential Exposure

The Organisation considers its exposure to slavery and human trafficking to be relatively low. However, it has taken proactive measures to ensure that such practices do not occur within its business or the businesses of any suppliers.

Steps Taken

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

The Organisation has undertaken the following actions in compliance with section 54(4) of the Modern Slavery Act 2015:

- All employees receive a written contract of employment and have access to a company handbook containing relevant policies. Employees are responsible for reading the handbook and understanding their obligations and the consequences of any breaches.
- Recruitment is limited to candidates who have the legal right to work in the UK, with verification of this right required.
- Employees are paid at least the National Minimum Wage or National Living Wage or more.
- The Organisation's code of conduct clarifies the expected actions and behaviour of employees. The Organisation strives to uphold high standards of employee conduct and ethical behaviour in its operations and supply chain management.
- The Managing Director is responsible for investigations and due diligence concerning known or suspected instances of slavery and human trafficking.

- The Organisation supports the right of all workers to freely choose employment and to associate freely. Workers are free to join a trade union, and training is provided to ensure a work environment free from harassment and unlawful discrimination.
- Working practices comply with the Equality Act 2010 and all relevant employment legislation. The Organisation has a zero-tolerance approach to forced or involuntary labour and does not tolerate such conduct from its suppliers.
- Staff are required to complete Modern Slavery training, refreshed every three years.

Key Performance Indicators

The Organisation employs the following key performance indicators to measure effectiveness in preventing modern slavery:

- Records of staff training (number of staff trained/informed)
- Number of reported suspicious situations
- Measures in place to identify and assess potential risks in its supply chains

Policies

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

- Whistleblowing Policy: Encourages employees and partners to raise concerns or disclose information about wrongdoing, illegal practices, or unethical conduct, including issues related to modern slavery and human trafficking.
- Anti-corruption and Bribery Policy & Health and Safety Policy: Reflect our commitment to ethical conduct and compliance with legal and regulatory obligations concerning our employees.

These policies and documents are reviewed at least annually.

Slavery Compliance Officer

The Organisation has a Slavery Compliance function, managed by Managing Director, to address concerns regarding modern slavery and undertake relevant actions in line with the Organisation's obligations.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and will be reviewed annually.

Date of approval: 17/06/2024

Signed: 

Print name: Barnaby Sturgess

Job Title: Managing Director

Date: 17/06/2025