Modern Slavery and Human Trafficking Statement – 2023 2024

The Donnelly Group of companies takes its social responsibilities very seriously and conducts its business in accordance with its core values of integrity, trust, respect and commitment.

Donnelly Group is committed to acting ethically in all our business dealings and relationships.

Donnelly Group has a zero-tolerance approach to acts of modern slavery and human trafficking within both its business and supply chain and requires the same standards from its suppliers.

Business practices and responsibilities can continually be improved, and Donnelly Group is committed to understanding more about modern slavery and human trafficking.

Group Organisational Structure

Donnelly Group is a group of nine companies with Donnelly Bros. Garages (Dungannon) Limited being the parent company.

The group's head office is in Dungannon, Co Tyrone with trading companies located across Northern Ireland.

The group's principal activities are the sale of new passenger cars and commercial vehicles from over 18 global manufacturers as well as the following functions.

- Retail of used vehicles
- Arranging finance & leasing of vehicles
- Providing vehicle aftercare including servicing and repair
- Retailing of parts and accessories
- Vehicle conversions to special purpose vehicles

Our supply chains.

The supply chain in the automotive industry is one of the most complex business sector supply chains, there could be up to ten levels of suppliers between a car dealership and the source of raw materials that make up all the various parts of the vehicle. The breadth, depth and interconnectedness of the supply chain can make it challenging to manage business and sustainability issues.

The group procures a wide range of vehicles, parts for vehicles and other accessories as well as other goods and services from a wide variety of suppliers.

Our supply chains currently support the following activities:

- Vehicle Manufacturing
- Vehicle retail
- Vehicle Leasing
- Product manufacturing & import
- Retail services
- Recruitment and training
- Advertising & marketing
- IT Services
- Operations & infrastructure support
- Business process outsourcing
- Accident Management

We have adopted a risk-based approach to the assessment of our business and supply chain, which has involved taking industry and market factors into consideration to identify categories of supply that may present a higher risk of modern slavery being present.

Due Diligence - Supply Chain standards and Actions to Address Risk

Donnelly Group prohibits all areas of its business and supply chains from engaging in slavery and human trafficking. The main protection against slavery is to ensure that all business activity complies with minimum wage and national living wage legislation; this is a fundamental requirement for all our contractors.

Donnelly Group also requires that all contractors only employ staff with a right to work in the UK. Suppliers/Contractors are required to declare on the 'Contractor Safety, Health, Environmental & Quality (SHEQ) Questionnaire whether they have a Modern Day Slavery policy.

Donnelly Group are progressing an approved supplier listing to ensure that only suppliers on this list can be used to supply goods and services throughout the group.

Respecting human rights and environmental issues in the supply chain is ultimately the responsibility of our suppliers. As customers in that supply chain, we will also play an active role in supplier development, and we will adopt various means to clearly communicate our expectations to our suppliers. We reserve the right to terminate any relationships with suppliers if there are any issues of noncompliance with our policies. Due diligence checkswill be carried out.

We also intend undertaking the following actions.

1. Introducing contractual obligations that reflect Modern Day Slavery legislation and Ethical Trade Base Code in our employee manual by inserting a Code of Conduct surrounding the following.

a. Prohibition of child labour
b. Prohibition of forced labour & human trafficking
c. Prohibition of physical disciplinary abuse
d. Prohibition of any infraction of the law
e. Non discrimination
f. Basic working conditions
g. Working hours
h. Environment
i. Freedom of association and
j. Health & Safety

2. Donnelly Group policy on the above will ensure that it clearly states that we will not tolerate forced labour (including human trafficking) or child labour in our operations and we will conduct regular checks to ensure compliance.

3. Donnelly Group have historically worked with suppliers that operate with ethical codes of conduct that include regular compliance audits and we only work with companies that contractually commit to complying with applicable laws and regulations.

4. Donnelly Group have appointed whistle blowing Champions who will be the designated people who all employees can report any concerns to.

5. Reviewing and assessing existing suppliers and in particular their sourcing policies in key risk areas.

6. All Managers will be given training on Equality and Dignity at work and the general staff will have awareness training at on boarding.

7. Assessing whether a formal supplier code of conduct and supplier terms and conditions similar to those for our sales process would be effective tools for areas of the business where a modern slavery risk is identified.

8. The Donnelly Group clearly communicates to employees the values, actions and behaviours expected of them when representing the company. Donnelly Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating both on-site and off-site and while managing its supply chain.

9. Recruitment and selection policy- Donnelly Group is registered as an Equal Opportunities employer and applies a fair recruitment process.

10. The aforementioned policy and code of conduct will be owned and administered by the Human Resources Manager at Donnelly Group.

Our approach

Primary responsibility for identifying risks and implementing process around prevention of modern slavery in our supply chain will lie with all Managers in the Donnelly Group who have a procurement responsibility.

We include Modern Day Slavery awareness, Dignity at Work and Whistleblowing at our Company onboarding for all staff.

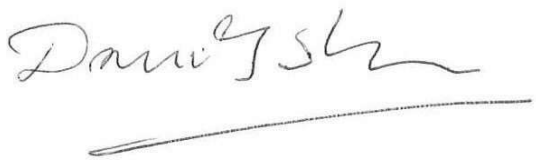
Further steps and training

Constant review of group processes for identifying, assessing, mitigating and reporting specifically on modern slavery risks in the business, as well as continuous development and staff training on the modern slavery policy throughout the group.

Approval

This statement is made in line with Section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the year 2023 / 2024. It will be reviewed and updated annually.

The Board of directors delegated approval of this statement on its behalf to the Managing Director of the Group, Dave Sheeran on 8th March 2023.



On behalf of the Board of Directors of Donnelly Group