

## **Ancaster Group Limited Slavery and Human Trafficking Statement**

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.

Ancaster Group is a private limited company. We are one of the largest and longest established dealer groups in the South East and represent six franchises which operate across thirteen dealerships at nine different locations. Employing around 310 staff, our business services include vehicle sales, sale of vehicle parts and vehicle servicing and repair.

As part of Ancaster's Induction process and throughout workers' employment with us, we train all staff to treat others with respect and courtesy as well as ensuring they adhere to all relevant laws, regulations and standards. This is an ongoing due diligence process. We offer a training and development program for all staff and focus on ensuring our management team is not only aware of the requirements to be alert to modern slavery but can also address concerns raised by their team or any suppliers. If any worker is found in breach of our policies, we ensure suitable disciplinary action is taken which can include termination.

We are committed to seeking to ensure that there is no modern slavery or human trafficking in our supply chain or within our business operations.

Our supply chain comprises of:

- New and used motor vehicles, components and products supplied by the vehicle manufacturers;
- Used motor vehicles purchased from private individuals, businesses and other motor retail companies primarily based in the UK; and
- Indirect goods, services, products and parts purchased from businesses primarily based in the UK.

To further our commitment to combat modern slavery and human trafficking Ancaster have taken, or are in the course of taking, the following actions:

- Updating the General Terms and Conditions of Business for the Supply of Goods or Services to Ancaster to include obligations that forbid the use of slavery and human trafficking;
- Developing a risk based approach to assess the likelihood of the existence of modern slavery within our supply chain;

- Introducing a due diligence process for those suppliers identified as being potentially high risk. A questionnaire will be issued to them which will be used to assess the robustness of their policies and controls to prevent modern slavery occurring in their operations and onward supply chains. The risk associated with that supplier will be assessed accordingly and, where required, an action plan will be agreed with the supplier and monitored by Ancaster;
- Implementing a supplier business review process, where appropriate, for high risk suppliers to ensure continued compliance.

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 are introducing a requirement for suppliers to certify that they do not participate in any forced or involuntary labour with their workers, subcontractors, agents or associates.

Ultimate responsibility for the prevention of modern slavery rests with the Board of Directors of the Ancaster Group Limited who have approved the content of this statement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 by Ancaster Group Limited for the financial year ending 31 December 2018.

For and on behalf of the Board of Directors

A handwritten signature in black ink that reads "David Bourne". The signature is written in a cursive style with a long, sweeping underline.

David Bourne  
Finance Director  
7<sup>th</sup> March 2019