



# Cotswold Motor Group

## Modern Slavery and Human Trafficking Statement

### Introduction

This statement sets out Cotswold Motor Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2020 to 31<sup>st</sup> December 2020.

As part of the Motor Industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and its supply chains.

### Structure and supply chains

Cotswold Motor Group is a franchised motor dealer consisting of 2 retail centres in Cheltenham and Hereford, together with a Bodyshop and PDI centre in Tewkesbury. Our core activities are the sale, service and repair of motor vehicles along with their associated parts.

In relation to our supply chains, we use our reasonable endeavours to conduct risk assessments of the third parties we work with. However, as the majority of our purchases by value come from multi-national motor manufacturers, our relationship is with them and not their supply chain. Therefore, we would refer any interested parties to view the Modern Slavery Statement of the relevant supplier(s) that we represent.

### Policies on Modern Slavery

As part of the organisation'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 from the ground floor through to management. We 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. Our policies explicitly include;

- Recruitment Process
- Equal Opportunities
- Bullying & Harassment
- Code of business conduct

### Due Diligence

Cotswold Motor Group takes its responsibilities seriously and assess the risk of slavery and trafficking into our supplier process for areas we deem to be at high risk.

### Risk Assessments

As part of our risk assessments, we have procedures in place to identify whether there is a possible risk of slavery and human trafficking either in the business or our supply chain. Our sources of supply are predominantly from the United Kingdom, Europe and the United States. As such, we do not view this as a significant risk and, as a result we have taken no further steps to assess and manage that risk. However, should a risk be identified, we aim to work with our colleagues and suppliers to ensure collaboration to remedy or mitigate such risks.

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.

### **Measuring Effectiveness**

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

- A review of our employment terms and conditions and recruitment policy
- Use of labour monitoring and payroll systems to determine compliance with Living/Minimum wage rates and Working Time Regulations
- Identify high risk within our supply chain

### **Training**

We require all managers within the organisation to complete training on modern slavery, the module covers:

- 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 our organisation
- what external help is available, for example through the Modern Slavery Helpline

As well as including our modern slavery policy within the organisation's handbook, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- what external help is available, for example through the Modern Slavery Helpline and how to report concerns regarding Modern Slavery

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the financial year detailed above.

A handwritten signature in black ink, appearing to read 'Andrew Hulcoop', is positioned above the printed name.

Andrew Hulcoop  
Managing Director  
1<sup>st</sup> April 2021