

Stebbing's Car Centre Limited (inc Garnham Management Service Limited)

Modern Slavery Act Statement 2018/2019

This statement is made in accordance with the Section 54 of the Modern Slavery Act 2015 (MSA 2015).

Modern slavery is the illegal exploitation of people for personal or commercial gain, often in horrendous conditions from which the victim cannot escape. Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation. Stebbings Car Centre Limited (SCC) has a zero tolerance approach to modern slavery and is committed to ensuring that it is not taking place within its business or supply chains.

SCC is the largest used car dealership in East Anglia and operates from a single site in Kings Lynn. Its principle activity is the sale of used vehicles and also arranges finance to enable customers to buy the vehicles. SCC (inc GMS) employs over 50 employees directly and also works with a variety of suppliers to provide a wide range of goods and services.

SCC main protection against modern slavery is to ensure that all business activities comply with minimum wage legislation and the same is expected of its suppliers. In addition SCC ensures that all people employed, directly and indirectly, have the right to work in the UK and appropriate checks are carried out by the HR department. To ensure external supply chains comply with this policy, SCC requires that business practices of each supplier are in accordance with MSA 2015 and monitors compliance by suitable levels of due diligence according to the level of risk of the potential for human trafficking and/or modern slavery.

The main area of risk within SCC/GMS's supply chains are the use of temporary workers, however with the above due diligence and regular monitoring, will ensure this risk is minimised.

Any instances of non-compliance of which SCC/GMS's is made aware, will be assessed on a case-by-case basis. Remedial action will be taken and tailored to suit the circumstances. The ultimate sanction for continued failure to comply will be for SCC to cease to trade with that supplier.

SCC operates a number of policies and procedures to prevent exploitation and human trafficking, which includes but is not limited to:

- ✓ Recruitment – including right to work checks, contracts of employments and ensuring everyone employed is 16 and above
- ✓ Equality and Diversity – creating an inclusive working environment free from discrimination and harassment and ensuring equality of opportunity
- ✓ Whistle Blowing – ensuring staff are aware they can raise concerns confidentially including suspicions relating to modern slavery
- ✓ Grievance procedure – providing a fair and transparent process for all employees to raise serious concerns regarding their employment.

SCC believes all employees have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity. A clearly defined Modern Slavery Policy has been developed and communicated to all colleagues within the business to ensure compliance and awareness at all levels. All employees involved in the recruitment and management of employees are also trained in Equality and Diversity and fair recruitment practices. Ultimate responsibility for defining and implementing policies and procedures lies with the HR team and ensures that everything implemented acts in accordance with current legislation, including modern slavery. The HR team is suitably trained on modern slavery, including the necessary steps to be taken if suspicions are raised within its business and/or supply chains.

This statement is approved by:

Richard Brown
Director