

ANTI - SLAVERY AND HUMAN TRAFFICKING STATEMENT

For SG Petch Limited for the financial year ending 30th April 2018.

We are committed to continually improving our practices to combat modern slavery and human trafficking within our own business and our supply chains. We acknowledge our responsibility to the Modern Slavery Act 2015 and want to ensure transparency within our organisation and any supplier organisations. We are satisfied that there is no evidence of any modern slavery or human trafficking within our own organisation.

ORGANISATION'S STRUCTURE

We are an automotive retailer undertaking sale and marketing activities, at a retail level, for new and used vehicles, new automotive parts and automotive aftersales servicing. We do not undertake any manufacturing. SG Petch Ltd trades as SG Petch and does not have any subsidiaries or a holding company and has a turnover in excess of 36 million.

The company's head office is in Darlington, County Durham, England and employs over 300 people all based in England and operates exclusively in the UK.

OUR BUSINESS

Our business is based across 5 sites in England which incorporate 19 franchised automotive dealerships retailing the following brands: - Abarth, Alfa Romeo, Fiat, Hyundai, Isuzu, Jeep, Kia, Mazda, Nissan, Peugeot and SEAT.

OUR SUPPLY CHAINS

Most of our supply chains are through the supply of vehicles and parts from the international automotive manufacturers we represent detailed above.

We also identify:

1. Cleaning services;
2. Valeting services;
3. Building contractors; and
4. Outsourced automotive "bodyshop" contractors,

within our supply chains. These non-manufacturer suppliers comprise a very small proportion of our supply chains, but we consider them to be at higher risk of potential breaches of the modern slavery obligations.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery and human trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We expect all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners to comply with our anti-slavery and human trafficking policy. We have in place a robust disciplinary procedure for dealing with any employee who fails to comply with our policy and values.

Our recruitment policies ensure employees establish their right to work in the UK and satisfy minimum age requirements and our internal human resources policies ensure working practices are monitored for ongoing compliance with current legislation.

Our whistleblowing policy provides internal contact points as well as access to an external reporting line to our employees, business partners and other third parties in order to report any whistleblowing concerns, including any Modern Slavery Act 2015 breaches or potential breaches.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have carried out a risk assessment to identify and assess potential risk areas within our supply chain, as detailed above.

We have in place systems to:

1. Identify and assess potential risk areas in our supply chains;
2. Mitigate the risk of slavery and human trafficking occurring in our supply chains;
3. Monitor potential risk areas in our supply chains; and
4. Protect whistleblowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chains and contractors comply with our values on anti-slavery and human trafficking we have in place a supply chain compliance programme. This consists of:

1. A procurement process expecting all high risk non-manufacturer contractors to perform their services in accordance with our anti-slavery policy and enter into contract terms to ensure such compliance; and
2. Undertaking confirmation procedures with our high risk non-manufacturer suppliers to ensure compliance with our policies.

Many of our low risk manufacturer suppliers have their own compliance requirements for their suppliers regarding modern slavery. For example, Peugeot require their suppliers' compliance with the PSA Requirement Regarding Social and Environmental Responsibility with Respect to Its Suppliers.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. This includes ensuring all staff can identify any issues and are aware of how to report them. All our staff are obliged to familiarise themselves with our anti-slavery and human trafficking policy which is easily accessible on our intranet together with an instructional video. New staff are also trained on our anti-slavery and human trafficking policy during their induction.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We may 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:

1. Record of training undertaken by staff;
- 2, Record of supplier agreements entered into including the requirement to comply with our values;
3. Monitoring suppliers we have identified as high-risk, ensuring they have agreed to adhere to our anti-slavery policy and have implemented their own procedures in this regard. We will also carry out annual reviews of such suppliers;
4. Working with external consultants who will audit the steps we have taken in combatting modern slavery and human trafficking and arrange for suppliers to adhere to our anti-slavery and human trafficking policy and values;
5. Use of labour monitoring and payroll systems to ensure compliance with National Minimum Wage and Working Time legislation.

FUTURE STEPS

We will ensure any new high-risk suppliers are identified and contractual declarations of compliance with our anti-slavery and human trafficking policy will be obtained. We will continue to train new employees and review training for existing employees.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2017.

Approved by the SG Petch Limited Board on 20th April 2018.

Signed
Simon D Rees
Finance Director