

Slavery and Human Trafficking Statement

Modern slavery is a serious and cruel crime, including activities such as slavery, servitude, human trafficking and forced labour, in which people are treated as commodities and exploited for criminal gain. Autoparts & Diagnostics Ltd has zero tolerance for slavery and human trafficking. We are clear as an organisation that we have a duty to be alert to risks, however small. Employees are expected to report their concerns, and management has a duty to act upon them.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Autoparts & Diagnostics Ltd has taken to help tackle modern slavery and human trafficking. This statement constitutes our slavery and human trafficking statement for the financial year ending 31 March 2018.

Organisational Structure and Supply Chain

1. Our Organisation: As an independent motor factor, the Company distributes vehicle spares to the automotive repair trade, its customers and other distributors of said parts. The Company operates from eight locations in the UK.

2. Our Suppliers: Autoparts and Diagnostics Limited does not carry out detailed checks to test suppliers' compliance with Company standards against trafficking and slavery throughout the entirety of their own supply chain. The Company does, however, require suppliers to certify that they comply with our Supplier Guiding Principles; The Supplier Guiding Principles communicate our values and expectations and emphasize the importance of responsible workplace policies and practices that comply, at a minimum, with applicable environmental laws and with employment laws and regulations. We expect our direct suppliers to follow the spirit and intent of these guiding principles.

3. Our Employees: Autoparts & Diagnostics Limited only employs people who are legally entitled to work in the UK. The Company has processes in place to make sure that every employee's eligibility to work status is validated using the proper documentation and using methods set out in legislation. During induction, Autoparts & Diagnostics Limited also requires all of its employees to read and acknowledge receipt of our employment policies, which make it clear that human trafficking and slavery is an offence and therefore unacceptable. Violation of any of these policies by any employee could result in disciplinary action and potentially dismissal.

4. Agency workers: The Company uses only reputable employment agencies to source labour; it always verifies the practices of any new agency it is using before accepting workers from that agency.

5. Communication and training: As well as our employees being made aware of our position on slavery and human trafficking during induction, those employees who deal with suppliers or in a position of management are required to familiarise themselves with the Modern Slavery Act in more detail. In addition, we review this statement and our Supplier Guiding Principles regularly and any updates are notified Company wide.

High Risk Activities

There are no activities within Autoparts & Diagnostics that are considered to be at high risk of slavery or human trafficking. Through the Supplier Guiding Principles, the Company aims to make sure that all suppliers report on their compliance with the Modern Slavery Act 2015. Actions will be taken in the event of a breach of these Guiding Principles.

Responsibilities

a. Slavery and Human Trafficking Statement: This is the responsibility of the Managing Director. This Statement is reviewed annually and reissued in March of every year, with the most recent version published on the Company website.

b. Policies: Our Human Resource function is outsourced to HR4:UK. It is responsible for making sure that all Company policies are fully compliant with UK employment legislation and that all policies are reviewed at least every two years. All policies are available to the Company's employees via the HR4:UK portal or in hard copy.

c. Risk Assessments: These will be conducted by the Managing Director with support as required from the outsourced Human Resources provider.

d. Investigations: It will be the responsibility of the Managing Director to investigate any concerns raised; the Managing Director will be supported by HR4:UK, as required.

e. Training: HR4:UK and payroll staff will help to maintain an acceptable awareness amongst our employees of modern slavery and human trafficking. This will be communicated via the Employee Handbook and supported by an information fact sheet for managers. To implement this policy, all employees with line management responsibility are given a copy of the policy statement and supporting materials.

Relevant Policies

In keeping with the Company's commitment to act ethically and with integrity in all its business dealings, a number of our existing policies are relevant to making sure that there is no slavery or trafficking in any part of the business. The Employee Handbook makes clear to employees the actions and behaviour that are expected of them when representing the Company; this Handbook is accessible to all employees on the HR4:UK website or in hard format. The policies detailed there apply to all Company employees. This Slavery and Human Trafficking Statement has been approved and authorised by the Board of Directors of Autoparts & Diagnostics Limited and is signed by a statutory Director of the Company.

Tristan Seal, Managing Director