

MODERN SLAVERY STATEMENT 2019

The UK Modern Slavery Act requires large commercial organisations operating in the UK to publish a slavery and human trafficking statement. This statement constitutes Car Giant Limited's (Cargiant) slavery and human trafficking statement for the financial year ended 31 December 2018.

What is Modern Slavery?

Modern slavery is the illegal exploitation of people for personal or commercial gain, often in horrendous conditions 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.

Cargiant recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

About Cargiant's structure

Cargiant is the largest used car dealership in the world and operates from a single site in North West London. Its principle activity is the sale of used vehicles and also arranges finance to enable customers to purchase vehicles. Cargiant employs circa 700 employees directly and also works with a variety of suppliers to provide a wide range of goods and services.

Our suppliers are predominantly based in the United Kingdom and we endeavour to only use reputable suppliers. Our supply chain consists primarily of suppliers of goods and services related to the automotive industry as well as professional advisors and financial services organisations.

Our policies

Cargiant operates a Modern Slavery policy, included in the Employee Handbook that details the Company's stance on human trafficking, forced labour, slavery and other forms of exploitation as well as the responsibilities of individuals across the business to identify and tackle Modern Slavery in the workplace. The Company also operate a number of other policies and procedures to prevent exploitation and human trafficking. These include:

- Recruitment – ensuring all direct employees and temp staff are eligible to work in the UK and are paid above the UK's minimum wage.
- 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.

Due Diligence, Assessment and Effectiveness

Cargiant's 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 Cargiant 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 upon commencement. During our compliance and due diligence checks we have identified that some employees request that their wages are paid into relatives account. This has highlighted a potential risk and we have put measures in place to ensure that all employees hold, and are paid directly, into their personal bank accounts.

To ensure external supply chains comply with this policy, Cargiant 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. Given the nature of our supply chains, we consider the risk of slavery or human trafficking to be low, however we will conduct regular reviews by:

- Mapping the supply chain broadly to assess product or geographical risk of modern slavery
- Evaluate the risk of modern slavery of each new supplier
- Integrate Modern Slavery into contracts with existing and new suppliers
- Conduct assessments or audits of suppliers, where potential for risks are identified
- Invoke sanctions against suppliers who fail to comply, including the termination of business where continued non-compliance is identified.

Training

In light of the Modern Slavery Act 2015, all existing employees were notified of the Company's Modern Slavery Policy and commitment to tackling it. We have also included the policy within the Employee Handbook and Company induction to raise awareness. All employees involved in the recruitment and management of employees have undertaken training on Modern Slavery.

The HR and Compliance teams are also suitably trained on modern slavery, including the necessary steps to be taken if suspicions are raised within its business and/or supply chains.

Ongoing monitoring

If any issues are identified in relation to modern slavery, these will be dealt with by the Compliance and HR departments. Each instance will be assessed on a case-by-case basis and remedial action will be taken and tailored to suit the circumstances.

This statement is approved by the Directors of the Company and will be reviewed annually.



Michael Holahan
Managing Director
March 2019