Arnold Clark Automobiles Limited ("Arnold Clark")

Anti-slavery and Human Trafficking Statement

In accordance with the Modern Slavery Act 2015 (MSA), this statement provides the measures that Arnold Clark takes to prevent slavery and human trafficking occurring in its business and supply chains.

Arnold Clark is fully committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chains and requires the same standards from its suppliers.

Arnold Clark operates retail sites and service centres across the UK. Its principal activities concern the sale, hire and servicing of automobiles. It represents 24 new car manufacturers and has 200 dealerships, 130 service centres, 40 accident repair centres and 13 parts centres. Arnold Clark also operates 35 car and van rental locations, three training facilities and six vehicle leasing business centres. Arnold Clark directly employs over 10,000 people.

The functions across Arnold Clark businesses are very broad. Arnold Clark:-

- sells new and used vehicles
- arranges finance to enable customers to buy vehicles
- provides vehicle aftercare including the servicing and repair of vehicles for both businesses and the general public
- sells parts and accessories from its parts centres across the UK
- hires vehicles to the public and to businesses throughout the UK
- provides a suite of fleet management services to businesses in the public, private and third sectors
- provides and organises insurance
- conducts MOT testing
- carries out accident repairs; and
- sells workshop and bodyshop equipment to businesses and the general public

Its training centres provide various qualifications including apprenticeships, business courses and building trade courses.

This statement will be made available on the company website, ArnoldClark.com, to all who engage with Arnold Clark whether in employment or in business so that those parties may acquaint themselves with the contents. Arnold Clark staff policies raise awareness amongst its staff of its Anti-slavery and Human Trafficking Statement.

Along with its General Business Code of Conduct and Group CSR Policy, this statement sets out the reasonable and practical steps which Arnold Clark takes to ensure its standards are being implemented across its business and supply
The steps taken by Arnold Clark to prevent slavery and human trafficking

Arnold Clark prohibits all areas of its business and supply chains from using slavery and human trafficking of any kind.

Arnold Clark’s main protection against slavery is to ensure that all business activity complies with minimum wage legislation. Arnold Clark also requires this of its contractors. Arnold Clark’s first line of defence against human trafficking is to ensure that all Arnold Clark Group employees have the right to work in the UK. Arnold Clark also requires that UK contractors only employ staff with the right to work in the UK.

Due to the breadth of its businesses and supply chains Arnold Clark is not in a position to check every business relationship and avenue. The principal areas in which there is a risk of human trafficking and slavery are those related to our supply chains. Arnold Clark sources and sells products and parts from a broad range of national and international suppliers. To ensure that external supply chains comply with this policy Arnold Clark requires that the business practices and supply chains of each supplier are in accordance with the MSA and Arnold Clark monitors compliance by suitable levels of due diligence according to the level of risk which Arnold Clark assesses of the potential for human trafficking and/or modern slavery.

Any instances of non-compliance of which Arnold Clark is made aware will be assessed on a case-by-case basis. Remedial action will be taken and tailored to suit the circumstances. Arnold Clark will only trade with those who fully comply with this statement or those who are taking steps towards full compliance. If Arnold Clark is not satisfied with the steps being taken towards full compliance, it will temporarily suspend its business with that supplier (to the extent permitted under contract or by law). The ultimate sanction for the continual failure to comply will be for Arnold Clark to cease to trade with that supplier (to the extent as permitted under contract or by law).

Arnold Clark will quickly and thoroughly investigate any claim or indication that any area of its business or supply chains is engaging in human trafficking or slave labour.

Any such claim coming to the attention of personnel within Arnold Clark would be reported to senior management in accordance with our Whistleblowing Policy. The board of directors will be informed of the issue including the findings and outcome of the investigation.

All Arnold Clark employees are provided with full details of Arnold Clark’s CSR Policy, Business Code of Conduct, Whistleblowing Policy and other company policies, including this statement. These are provided on the Arnold Clark employee portal. All employees are encouraged to familiarise themselves with this information at induction and by regular email updates. The Code of Conduct specifically outlines ethical business practice as integral to all our dealings and our expectation of compliance with applicable laws is absolute.

This statement has been approved by the board of directors of Arnold Clark, who will review and update it as necessary on an annual basis.

Last Reviewed: 31/08/2018