Modern Slavery Statement

Slavery and Human Trafficking Statement for Cambria Automobiles Plc and its subsidiaries for the year ending 31 August 2018

The Modern Slavery Act 2015 (MSA 2015) focuses specifically on the issue of modern slavery to ensure offenders are suitably reprimanded with severe sentences. Modern slavery encompasses the offences of: 'slavery' where ownership is exercised over a person; 'servitude' which involves the obligation to provide service imposed by coercion; 'forced or compulsory labour' which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily; and 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

The MSA 2015 requires large businesses, with sales of over 36 million, to be transparent about their efforts to eradicate slavery and human trafficking. This statement therefore explains the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or any part of our business.

Our Company

The company is composed of Cambria Automobiles Plc and its subsidiaries, Cambria Vehicles Services, Thoranmart Ltd, Grange Motors (Swindon) Ltd, Cambria Automobiles (Swindon) Ltd, Cambria Automobiles (South East) Ltd, Invicta Motors Ltd, Invicta Motors (Maidstone) Ltd, Grange Motors (Brentwood) Ltd and Repairs and Maintenance Plans Ltd.

Our Associates

As part of the organisation’s induction process and throughout workers’ employment with us, we coach all associates to treat others with respect and courtesy as well as ensuring they adhere to all relevant laws, regulations and standards.

The undertaking of the induction process is part of the ongoing due diligence process. We focus on ensuring our management team is not only aware of the requirements to be alert to modern slavery but can also address concerns raised by their team or any suppliers. If any worker is found in breach of our policies, we ensure suitable disciplinary action is taken which can include termination.

We allow all individuals who work or provide services to us the right to freely choose employment and, the right to affiliate freely with other individuals. Associates are free to choose whether to join a trade union or not and as a result of our coaching and the Equal Opportunities statement, we offer an environment which is free from harassment and unlawful discrimination.

We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation. We do not engage in forced or involuntary labour and have a zero tolerance approach to the same, meaning we do not tolerate any of our suppliers engaging in such conduct. We require suppliers to certify that they do not participate in any forced or involuntary labour with their workers, subcontractors, agents or associates. Cambria Automobiles Plc and its subsidiaries work in accordance with the European Court of Human Rights guidance and requirements.

Our Suppliers

The Company uses Group suppliers and in some cases local suppliers of goods and services.

The supply chain that exists within Cambria Automobiles Plc and the automotive industry in general, is highly complex.

With the manufacturers as our primary suppliers the chain becomes more challenging in relation to the diligence and assessment of the risk of slavery and human trafficking within it. The interconnection between Cambria Automobiles Plc and the manufacturers primary supply chain is global.

Our Assessments

We use reasonable endeavors to conduct risk assessments of all third parties ensuring that we are in receipt of their own
Slavery and Human Trafficking Statement as a declaration of their responsibilities and compliance. We aim to ensure that our performance indicators do not put pressure on or influence any modern slavery risk through the negotiation of agreed performance targets with our suppliers.

The global scale of the supply chain increases the risk of not being able to directly monitor the impact of operations of slavery and trafficking outside of our primary supply partners, however feel that the collation and commitment of the suppliers own slavery and human trafficking does allow us to understand the impact and risks of the supply chain and monitor any action plans in place.

The smaller primary suppliers, who are not required to produce a Slavery and Human Trafficking Statement, increase our inability to be able to monitor this as effectively. On this basis we require a copy of their Equal Opportunities Statement and Whistleblowing policy as part of our risk assessment.

Our Commitment

This policy will be reviewed on an annual basis and where necessary require a corrective plan from a supplier, or the implementation of new assessments.

Cambria Automobiles Plc and its subsidiaries will not knowingly support or deal with any business involved in slavery or human trafficking.

Mark Lavery
Chief Executive
Cambria Automobiles Plc