



Assured Group of Companies Anti-Slavery & Human Trafficking Statement

Introduction

This statement applies to the Assured Group of Companies (referred to in this statement as 'the Organisation' or 'the Company').

It sets out the Organisation's strategy and actions to understand and manage any potential risks within the business, and to put in place actionable plans which are designed to ensure that no slavery or human trafficking takes place within its Operations and those of suppliers.

Modern slavery is both a crime and morally reprehensible act which deprives individuals of liberty and dignity, for another person's gain. The Organisation has a zero-tolerance approach to such acts, and is fully committed to preventing slavery and human trafficking, both in our own operations and those of our supply chain.

Whilst working within the automotive and transport sectors, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. As such, it is absolutely committed to preventing such acts within our Organisation and anyone at risk within our supply chain.

This statement relates to actions and activities during the financial year ending **31 December 2022**, and is made pursuant to the Modern Slavery Act 2015.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking;
- forced work, through mental or physical threat;
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- being dehumanised, treated as a commodity or being bought or sold as property;
- being physically constrained or to have restriction placed on freedom of movement.

The Modern Slavery Act 2015

The Modern Slavery Act gives law enforcement the tools to fight modern slavery, ensure that perpetrators receive suitably severe punishments for these appalling crimes and enhance support and protection for victims.

It also requires businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains.

This statement is published on the Company website to increase transparency in the Organisation's dealings. The publishing of the statement therefore allows the public, consumers, employees,



subcontractors and suppliers to view the steps the organisation is taking to help to tackle modern slavery.

Organisational structure

This statement covers the activities of the Assured Group of Companies. These include, but are not limited to:

Assured Group Ltd specialises in providing Vehicle Preparation Management, associated value added services and managed labour solutions to the automotive industry across Europe. Assured provides a highly flexible workforce and long term cost effective solution to our clients across three main divisions of the automotive sector - Rentals, Garages and Fleet. Our client portfolio includes Vehicle Manufacturers, Auction Houses, Daily Rental Companies, Dealer Groups, Logistical Operations, Vehicle Dealers and Repairers.

Acerta Group Limited provide Facilities Management, from property services and special projects through to contract services, offering a one stop solution for all facilities requirements.

Assured Aviation Services is an airport services business which provides a whole range aircraft and facility related presentation, cleaning and fumigation services around the United Kingdom.

Logic 360 Ltd provides Recruitment, Workforce Management, contingency Support and Back Office Administration services to a wide variety of clients.

In the UK, Assured currently employs over 900 staff, and engages the services of over 4000 self-employed subcontractors, who are engaged to supply services at our clients' premises, including vehicle preparation, delivery and collection.

Supply chains

In order to fulfil its operational activities, the Organisation engages a variety of local, national and international suppliers to source goods, services and equipment. As such it is committed to ensuring that all those within our supply chain are also working in adherence to the Modern Slavery Act 2015 and that there is complete transparency of their modern slavery practices.

Responsibility

The Company's Board of Directors has ultimate responsibility for the its anti-slavery initiatives across the organisation.

Heads of Department within the organisation, such as Human Resources and Health & Safety, also have a responsibility for putting in place and reviewing policies relating to Modern Slavery. This is in order to identify and analyse potential risks with regards to human rights and modern slavery, and conduct investigations and due diligence in relation to suspected instances of slavery and human trafficking.

Operations Management at all levels are also responsible for ensuring those reporting to them understand and comply with this policy and are given regular training on it and the issue of modern slavery.



Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Modern Slavery and Human Trafficking Policy: Highlights that Modern slavery is a crime and a violation of fundamental human rights and explains how to report any violations.

Standards of Business Conduct: The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

The organisation has other policies and procedures in place which work alongside this statement. These include Whistleblowing, Corporate Social Responsibility, Recruitment and the Supplier Code of Conduct. These policies are regularly reviewed following the end of each financial year.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have been involved with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain;
- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers (either directly or via third party auditors) and requiring them to implement action plans;
- using ethical suppliers who in turn monitor their labour standards, comply in general, and with modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, we are in the process of introducing the following:



- All Local Management who have direct reports are to be trained on the issue of Modern Slavery. All HR professionals, and any individuals who have direct contact with suppliers will also undertake training on this issue. HR will guide and train Local Management of their obligations and responsibilities regarding these issues.
- All existing supply chains will be reviewed, whereby the organisation will evaluate all existing suppliers.
- All new and potential suppliers must confirm their adherence to the Modern Slavery Act 2015. The organisation are in the process of implementing such a system to capture this information.

The above KPIs are expected to be completed within 6 months of the date of this Statement.

Training

The organisation requires local management, HR professionals and any individuals who deal directly with suppliers within the organisation to complete training on modern slavery. This training is in progress and is expected to be completed within 6 months of the date of this Statement via an online course.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.
- Awareness-raising.

As well as training personnel, the organisation has raised awareness of modern slavery issues by circulating a series of emails.

The emails explain:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.



All Assured Group of Companies personnel are expected to familiarise themselves with any policy to assist in identifying and preventing any acts of modern slavery or human trafficking. Any new team members are also introduced to the policy as part of their induction process with the company.

This statement has been approved by the organisation's board of directors, who will review and update it annually.

A handwritten signature in blue ink, appearing to be "Heath Evans", written over a horizontal line.

Signed: _____

21 April 2023

Date: _____

Heath Evans - Group Managing Director