

## Statement of Rossetts Commercials Ltd, Pursuant to the Modern Slavery Act 2015

The Modern Slavery Act 2015 came into effect on 29th October 2015. This law requires manufacturers and retailers doing business in the UK which supply goods or services, who exceed the turnover threshold, to disclose information regarding their policies to eliminate slavery and human trafficking from their supply chain and within their business.

### 1. About Rossetts Commercials Ltd

Rossetts Commercials Ltd is a business that operates as a Mercedes-Benz Commercial Vehicle Dealership. We have four sites across the UK – Worthing, Eastbourne, Aldershot and Crawley. Rossetts Commercials Ltd are proud of the integrity measures we take in this regard. During the 2017/2018 financial year Rossetts have made efforts to eliminate slavery and human trafficking in our business and supply chains.

### 2. Our Policy

Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world and a violation of fundamental human rights. Rossetts (UK) Ltd have a zero-tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity in all activities and business relationships. We expect our Supply Chain, Contractors, Employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect all acts of exploitation, servitude and forced or compulsory labour. We are committed to supporting Jobs with Dignity and in upholding our Moral Rights and Obligations.

### 3. Supply Chains

The Mercedes-Benz UK Companies maintain written policies that strictly prohibit the use of slavery or human trafficking in their direct supply chains. These include the Mercedes-Benz UK Companies' brochure entitled "Ethical Business – Our Shared Responsibility" in which they communicate their ethical principles and associated expectations to their supply chain. Their supplier code of conduct requires all suppliers to the Mercedes-Benz UK Companies, to sign up to a sustainability clause which details all requirements around forced labour, slavery and human trafficking.

Rossetts are committed to maintaining the highest ethical standards across our supply chains. The detection and prevention of modern slavery is the responsibility of those working for the Company or in association with the Company.

To achieve these standards, Rossetts (UK) Ltd will ensure that:

- All our employees are made aware of the basic principles of the Modern Slavery Act 2015
- All new starters are trained on the risks our business faces in our supply chains
- All suppliers, contractors and business partners are aware of our zero-tolerance approach to modern slavery at the outset of our business relationship with them

### 4. Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our employees, suppliers, workers, directors, agents, distributors and all third-party business partners).

## 5. Our Commitment

The Company operates using the following internal policies to prevent slavery and human trafficking in its operations. These describe our approach to the identification of modern slavery risks:

Whistleblowing policy: The Company has a whistleblowing policy in place to encourage all its workers, customers and all business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise in relation to slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact the Dealer Principal directly.

Employee code of conduct: The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour both when representing the business at all times and managing its supply chain. It is important that a new employee to the Company is provided with as much information as is reasonably practical to enable them to settle in and find their feet as soon as possible. At Rossetts Commercials, all new starters are inducted and trained on the rules and procedures that clarify how they should treat fellow employees. The aim of this is to ensure harmony and respect amongst individuals and to promote good working practices. The Company recognises our legal obligation and will not tolerate acts which breach our policies and, in all incidents, breaches will be investigated and if necessary suitable disciplinary action will be taken.

Company Code of Conduct: We are committed to ensuring we have a free from harassment and unlawful discrimination. We ensure our working practices are in accordance with all relevant employment legislation including the Equality Act 2010, Protection from Harassment Act 1997 and the Health and Safety at work act 1974. We also allow all employees the right to join a trade union of their choice. Any relevant policies can be found in the company handbook.

## 6. Compliance

All persons working for us or on our behalf in any capacity must:

- Read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy.
- Notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

## 7. Breaches of Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

## 98. Ongoing Review/Audit

We will review and audit our Supply Chains, External Operations and Internal Operations on an ongoing basis to check compliance with the above policy, and to check that our policy is being implemented effectively.

## Approval

This statement has been approved by the Company's Dealer Principal who will review and update it annually.

Rossetts (UK) Ltd

Date: 25<sup>th</sup> March 2021