

## Modern Day Slavery – IMPERIAL (UK) Group

This scope of this policy applies to IMPERIAL UK consisting of IH Mobility Holdings (UK) Limited and its subsidiaries; Employees, Franchise & Manufacturing Partners and Suppliers of Goods & Services engaged in business with IMPERIAL UK.

The Statement covers Modern Day Slavery and Human Trafficking in accordance with the Modern Day Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business for the financial year ended 30 June 2017.

Modern Day Slavery and Human Trafficking can take on many forms such as; slavery, servitude, forced labour, compulsory labour and human trafficking. Such activities are an affront to human dignity, an offence in UK law and completely contrary to the values of the IMPERIAL UK.

### Group overview

IMPERIAL UK is the largest independent commercial vehicle dealer group in the UK, with 39 dealer sites, providing both heavy and light commercial vehicle sales, parts sales and commercial vehicle repair and maintenance. Other operations include bodyshop, vehicle conversions and tail lift supply and repairs. We also have a network of 14 ATF sites, able to carry out DVSA MOT's on Commercial Vehicles.

We work with a number of franchise partners that include DAF Trucks, Mercedes Benz Trucks, Mercedes Benz Vans, VW Commercial Vehicles, ISUZU Trucks and pick-ups, NISSAN, IVECO, FORD Commercials, FIAT Professional, Renault Trucks, LDV and MAN Trucks.

IMPERIAL UK employs over 1,600 staff, operating on mainland UK. The UK business is owned by Imperial Holdings Limited and is a JSE listed South African-based international group of companies operating in the logistics and vehicle sectors with operations mainly in Africa and Europe.

### Policy and principles

IMPERIAL UK is committed to complying with its obligations under the Modern Day Slavery Act and other relevant legislation relating to the detection and prevention of modern slavery. In particular, IMPERIAL UK is committed to implementing and enforcing effective systems and controls that seek to ensure that modern slavery is not taking place anywhere in its business or in its supply chains. The Company expects that any organisation within the scope of the legislation will also apply the same high standards.

The Company has zero tolerance to breaches in the Modern Day Slavery Act and has in place policies processes, whistleblowing and auditing procedures to ensure that any organisation within the scope of the policy who transacts business with IMPERIAL UK complies with it.

The company will terminate any commercial relationships with suppliers if they are in breach of our policy and/or are found to have been involved in modern slavery.

Our recruitment processes are transparent with appointments approved by Directors. There are robust procedures in place for the vetting of new employees that enables us to confirm their identities and ensure they are both paid directly and correctly.

Any breach of our Modern Day Slavery policy by any employee will result in disciplinary action which could result in dismissal for gross misconduct.

## Managing risk in our supply chain

We are committed to maintaining the highest ethical standards across our supply chain. The prevention, detection and reporting of modern slavery in any part of the Company's business is the responsibility of all those working for the Company or under the Company's control. Individual management teams are responsible for ensuring compliance with laws and regulations, including compliance with the Modern Day Slavery policy.

To achieve this, IMPERIAL UK will ensure that:-

- All colleagues are aware of the Modern Day Slavery policy by making it available to view on the Company Intranet; and
- Managers and their teams will be responsible for ensuring that IMPERIAL UK has on record for suppliers a signed IMPERIAL declaration of compliance (to our Modern Day Slavery Policy).

## Actions taken in financial year ended 30 June 2017

During the financial year ended 30 June 2017, IMPERIAL UK took the following steps with the intention of ensuring that slavery and human trafficking does not take place in its business or supply chains:-

1. Group Modern Day Slavery Policy  
A new Group Modern Slavery Policy was introduced. The policy applies to all Group companies, divisions and businesses, and their respective staff and subcontractors. The policy was provided for business Directors for circulation to those employees and teams to consider in their purchasing decisions and arrangements.
2. Risk assessments  
Risk assessments were undertaken on a prioritised and proportionate basis to identify areas of potential risk in relation to modern slavery and human trafficking among existing suppliers. The majority of our supplies are from our main franchise partners of commercial vehicles and parts.
3. Standard contractual documentation  
We commenced reviewing our standard terms and conditions for suppliers to comply with the Modern Slavery Act. These are still to be finalised and introduced for use in contracts with suppliers.
4. Human Resource Policies  
We commenced reviewing our HR policies in January 2017 to update these to reflect Modern Day Slavery requirements where required. All policies should be reviewed by end of 2017.
5. National Minimum Wage Reviews  
We conducted a national minimum wage reviews in September 2016 and March 2017 to verify all employees are paid in accordance with legal requirements.
6. Employee induction and training  
Our obligations in relation to modern slavery are communicated to new employees as part of inductions provided.

## Approval

This statement is made with respect to the financial year ended 30 June 2017 in accordance with section 54(1) of the Modern Slavery Act 2015. The statement will be reviewed and updated (if necessary) annually to reflect our ongoing commitment to ensuring that its business and supply chains are free from slavery and human trafficking.



Ian Oakes

**Group Managing Director (IMPERIAL UK)**

**30 June 2017**