



Minstergate™

## Minstergate Modern Slavery Policy

All Directors of Minstergate Ltd are committed to ensuring compliance of the UK Modern Slavery Act 2015.

### What is Modern Slavery?

Modern slavery encompasses **slavery, servitude** (the behaviour on the part of the offender as if they owned the victim, depriving the victim of their freedom), **human trafficking** – (arrangements for the travel of the victim with a view to them being exploited) and **forced labour** – (work or service of a victim which involves coercion, either direct threats or violence or more subtle forms of compulsion. Work or service is extracted from the victim under the menace of any penalty and for which the victim has not offered themselves voluntarily).

Minstergate will not tolerate any of the aforementioned behaviour in its business. All Directors are committed to acting ethically and with integrity and transparency in all business dealings.

Minstergate have implemented policies and practices which are continuously monitored and are aimed to ensure that there is no slavery or human trafficking in its own business or supply chains.

If anyone has any concerns or suspicions about moderns slavery in any parts of the business or supply chains they must speak to a Director of the Personnel Manager.

The company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

### Organisation Structure & Supply Chains

Minstergate is a privately owned company with Car Dealerships throughout Yorkshire. Branches include main franchise Hyundai, Peugeot & MG Dealerships in Hull, Scarborough & York with a used car dealership in Hutton Cranswick. The main dealerships also include repair centres focusing on all types of repair and servicing of Hyundai, Peugeot, MG and all makes of vehicle. Our head office based in Hessle also has a Bodyshop on site, carrying out repairs for all makes of vehicles to insurance approved standard.

Our supply chains include sourcing, sale and leasing of motor vehicles, parts, and consumables.

## **Due Diligence Process for Slavery and Human Trafficking**

- We manage all dealerships in line with best practice.
- The geographical scope of our premises are limited allowing us to have firm control on our activities and being able to adequately oversee them.
- Where possible we build long term relationships with local suppliers and make clear Minstergate expectations of business behaviour.
- With regards to any National or International supply chains, our point of contact is the represented personnel of our UK based manufacturer partners and we expect these companies to have robust anti-slavery policies in place.

## **Policies**

Minstergate operates a number of internal policies and procedures which aim to ensure we conduct our business in a legally compliant and ethical manner. Minstergate employee handbook contains the following policies:

**Employee Code of Conduct:** The employee conduct policy states clearly that all employees must conduct themselves in a manner which is not detrimental to the company.

All employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possibility stage.

**Equal Opportunities Policy** – makes clear to employees our approach to equal opportunities, conduct at work and the avoidance of discrimination at work.

**Bullying & Harassment Policy** - makes clear to employees our commitment that their working environment will be free from harassment and bullying and ensuring all employees are treated and treat others with respect.

Each policy explains how employees can identify and raise concerns about unacceptable behaviour.

## **Responsibility for This policy**

The Directors have joint responsibility of monitoring the implementation of this policy and assessing its effectiveness.

The Personnel Manager will ensure all employees receive a copy of this policy on induction.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.