



# MODERN SLAVERY STATEMENT

---

This statement applies to all companies within and associated to Gravell's Limited (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year ending December 2019.

## **B) ORGANISATIONAL STRUCTURE**

The Group and its subsidiaries was established in 1932. Currently there are 10 designations and they operate in Wales employing 130 staff. The Group's annual turnover exceeds £73 million.

The labour supplied to the Group in pursuance of its operation is carried out from a centralised office in Kidwelly, MD operates from here with managers at each other site. Work is mainly in the UK, with sites in Kidwelly, Narberth, Swansea and Bridgend, South Wales. Employees may be sent to any part of the UK to carry out work and may sometimes be sent to foreign countries on business trips as and where they arise.

## **C) DEFINITIONS**

The Group 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 of 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.

## **D) COMMITMENT**

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Gravell's Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

## **E) SUPPLY CHAINS**

In order to fulfil its activities, the Group's main supply chains include those related to the supply of vehicles, parts, tyres, diesel and petrol from the UK, a number of European Countries and South Korea. The Group supplies vehicles, parts, tyres, diesel and petrol to the end consumer but also acts as an intermediary supplier to lower-tier suppliers in the provision of parts and vehicles.

## **F) POTENTIAL EXPOSURE**

The Group considers its main exposure to the risk of slavery and human trafficking to exist in South Korea.

In general, the Group considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## **G) STEPS**

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

The Group has put in place a specific policy in relation to whistleblowing which, whilst not focussing specifically on modern slavery, sets out the process by which concerned employees and Board Members can report any concerns of wrongdoing involving the Group. We also have Codes of Conduct and an employment Equality, Diversity and Inclusion Policy that sets out the Group's commitment to developing, maintaining and supporting a culture of equality and diversity in employment in which employees are treated equitably, and can realise their potential.

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

- Reviewed suppliers Modern Slavery Statements
- Made Modern Slavery Statement available for employees to read and comply with.

## **H) POLICIES**

The Group has the following policies which further define its stance on modern slavery:

- Modern Slavery Statement

## **I) TRAINING**

The Group provides the following training to staff to effectively implement its stance on modern slavery :

- Policies provided in Company Handbook and on site in respect of Whistle blowing and protection of Whistle Blower.

**J) FUTURE PLANS**

We are planning to undertake a number of activities over the next 12 months to improve our processes and procedures in respect of the Modern Slavery Act. These activities include:

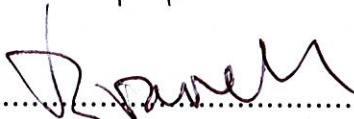
- Reviewing our Procurement Processes and Procedures, so that they include references to modern slavery and human trafficking.
- Revisiting our Whistleblowing Policy and Codes of Conduct to ensure they remain fit for purpose in light of the Act's requirements.
- Improving the awareness of our employees, customers and suppliers regarding the Modern Slavery Act 2015, including what constitutes modern slavery and human trafficking.
- Updating all employee and contractor training relating to safeguarding, to include reference to modern slavery; and
- Monitoring our suppliers and supply chains to ensure they are, and remain, free from slavery and human trafficking.

**K) SLAVERY COMPLIANCE OFFICER**

The Group has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Group obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval ..... 2/1/19 .....

Signed .....  .....

Managing Director

Date .....