

Modern Slavery and Human Trafficking Statement 2018

1. Introduction

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3. Since the publication of our 2016/2017 Modern Slavery and Human Trafficking Statement we have been working to increase and improve our anti-slavery and human trafficking efforts.
- 1.4. This Statement should be read in conjunction with our 2016/17 Modern Slavery and Human Trafficking Statement, our Code of Business Conduct and our Code of Ethical Trading.
http://www.northgateplc.com/files/5515/1748/0796/Modern_Slavery_Statement_-_May16.pdf
http://www.northgateplc.com/index.php/download_file/650/
http://www.northgateplc.com/files/3214/2659/3825/Code_of_business_conduct.pdf

2. Our business

The structure and nature of our business has not changed since the publication of our last modern slavery statement. Northgate plc, listed on the London Stock Exchange, is the parent company of a group of companies engaged in the provision of vehicle rental and related activities in the UK, Spain and Ireland. The head office is in the UK and the principal operating subsidiaries are Northgate Vehicle Hire Limited, Northgate Vehicle Sales Limited, Northgate Espana Renting Flexible S.A. and Northgate Vehicle Hire (Ireland) Limited. The group continues to employ over 3000 people across the three jurisdictions.

3. Our supply chain

Supplier Management:

- 3.1. We aim to foster long term relationships with suppliers that we can trust, that understand our expectations and that we can communicate with candidly. We favour new and existing suppliers who can demonstrate good practice and a commitment to combatting modern slavery. We require all new suppliers to complete a due diligence questionnaire which aids our assessment of whether prospective suppliers are suitably well governed.

- 3.2. We have had comprehensive anti-slavery and human trafficking contractual clauses prepared which will place strict contractual obligations on suppliers and allow us greater control and monitoring rights. We intend to insert these contractual clauses into all new supplier agreement that are deemed to present an increased risk of modern slavery.
- 3.3. We require all suppliers and contractors to agree to comply with our Code of Ethical Trading (link provided at paragraph 1.4) or to confirm that they have in place their own equivalent code of at least the same standard and to provide us with a copy of such code.
- 3.4. Our Code of Ethical Trading requires suppliers to agree that they will not:
- use child labour;
 - allow inhumane treatment of their workforce;
 - practise discrimination; or
 - allow or encourage working of excessive hours.
- 3.5. In the event that our suppliers do not comply with our Code of Ethical Trading we reserve the right to terminate our relationship with them. However, if we became aware of slavery or human trafficking in our supply chain we would alert the appropriate authorities and then take one of the following course of actions:
- 3.5.1. In the first instance, if appropriate and at all possible, we will seek to work with local NGO's and use our influence with the suppliers in question to improve conditions for the victims so that they are legitimately engaged in gainful employment. Improvements would be subject strict proof and required within prompt deadlines; or
- 3.5.2. In the event that 3.5.1. is not possible we will terminate our relationship with the supplier in question.

Risk Analysis:

- 3.6. We have analysed the risk profile of our tier 1 suppliers by considering the countries where they are based and the products and services that they deliver. Recognised external data suggests the overall risk of modern slavery and human trafficking in tier 1 of our supply chain is low. If potentially higher risk suppliers are identified we will seek assurances of good practice from them and place additional focus on applying the systems of control and monitoring referred to above.
- 3.7. Our main purchases, in volume and costs, are of vehicles (cars and vans), and vehicle parts and related products. As mentioned, we favour reputable manufacturers/suppliers of these products and at present are satisfied that all have strong anti-slavery and human trafficking positions and are taking appropriate action to combat modern slavery in their own supply chains.

4. Our people

Our Policies:

- 4.1. We have implemented a comprehensive Anti-Slavery and Human Trafficking policy that makes clear:
- What our expectations are;

- What employees should look out for; and
- Who they should report any concerns to both inside and outside of our organisation.

This policy sits alongside our Whistleblowing and Equal Opportunities policies. We regularly review and, as appropriate, update all policies.

- 4.2. It is our policy to conduct “right to work” checks on all direct employees prior to them commencing their roles with us. This includes checking that all staff recruited are of an appropriate age for employment and are eligible to live and work in the country of employment.

Training:

- 4.3. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we bring our Anti-Slavery and Human Trafficking policy to the attention of all staff during our induction programme and we require all staff to undergo periodic training to update and refresh their awareness of the issue and the things they need to look out for.
- 4.4. We have recently developed an interactive online Modern Slavery training module and require all employees to complete this by 30th September 2018.

Risk Analysis:

- 4.5. As mentioned in paragraph 2, we directly employ over 3000 people across three jurisdictions; the UK, Spain and Ireland.
- 4.6. The guidance available suggests that hourly paid employees engaged by us to assist with services such as cleaning or car washing are those within our business who are most at risk. We aim to be diligent across the board but ask our staff and particularly managers involved within these areas to be especially vigilant.
- 4.7. Notwithstanding paragraph 4.6, having considered the location of our operations and the roles being performed we currently deem the overall risk of slavery and human trafficking existing within our direct employee population, or our agency and contract staff population to be low. Nonetheless, we appreciate that risks exist for all businesses in all jurisdictions and that businesses have an obligation to minimise opportunities for those who look to exploit others for their own personal or financial gain.

Our approach to combatting modern slavery in our business and in our supply chain is continually evolving. We are committed to making progress and increasing and improving the effectiveness of our efforts year on year.

This Statement which applies to our businesses in the UK, Spain and Ireland, is made pursuant to section 54(1) of the modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement for the financial year ending 2018.

Chief Executive Officer

Northgate plc