



BALLYVESEY HOLDINGS LIMITED

Modern Slavery Statement

Introduction

This Slavery and Human Trafficking Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 relating to Transparency in Supply Chains. This statement sets out the steps Ballyvesey Holdings Limited has continued to take to address the risk of slavery and human trafficking within its operations and supply chain in the financial year ending 30 September 2020.

Organisational Structure

Ballyvesey Holdings Limited through its subsidiary businesses provides a wide variety of transport related services. Operating predominantly in the transport sector, the group's subsidiaries are focused on road transport, warehousing, commercial vehicle sales, rental, trailer manufacturing, plant sales, hire, property and recruitment. The subsidiaries of Ballyvesey Holdings Limited employ over 2,000 people in the United Kingdom and Ireland. Ballyvesey Holdings Limited, operate primarily in the United Kingdom and Ireland. The organisation's registered office is in Doncaster, South Yorkshire.

The subsidiary business units, autonomous in their own right, draw on support centrally from Ballyvesey Holdings Limited in respect of health and safety, the environment, legal counsel, human resources, property, IT, insurance and finance.

The business units recognise their individual responsibility to take a robust approach to slavery and human trafficking. The Group is absolutely committed to preventing slavery and human trafficking and to ensuring its supply chains remain untainted.

Countries of Operation and Supply

Ballyvesey Holdings Limited operates in the United Kingdom and Ireland.

Ballyvesey Holdings Limited remains committed to review and evaluate our supply chains to identify human trafficking risks and slavery risks and we continue to review all aspects of the supply chain function with zero tolerance for non-compliance.

Across the business units Ballyvesey Holding's primary supply chain includes:

- Commercial vehicle and plant manufacturers
- Commercial vehicle and plant equipment suppliers
- Manufacturers of goods and materials
- Utilities and service providers

The procurement of services and supplies is undertaken professionally by supply chain and or procurement specialists within the central supply chain function or within the business units. It is our intention to maintain long term relationships with customers and suppliers and we actively encourage collaborative working and good industry practice.

As a business we continue to support the Stronger Together Programme, and fully endorse the work being done to reduce forced labour and human trafficking in the United Kingdom, Ireland and across the world.

Responsibility

Responsibility for the organisation's anti-slavery and human trafficking initiatives is as follows:

- **Policies:** Human Resources
- **Risk assessments:** Procurement & Group H&S Management Team
- **Investigations:** Group Finance & HR/Compliance
- **Training:** Procurement & Human Resources

Relevant policies

Ballyvesey Holdings Limited is committed to ensuring there is no modern slavery or human trafficking in its supply chain or in any part of its business with a zero tolerance for non-compliance.

This statement reflects that commitment to acting ethically in all business units and to establishing an effective system to ensure slavery and human trafficking is not present in the supply chain. Ballyvesey Holdings Limited operates under a number of policies, which underpin our ethical approach to business:

- **Whistleblowing policy** - Ballyvesey Holdings encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact James Darragh BVH Group Director on 02890 849321.
- **Employee code of conduct** - Ballyvesey Holding's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** - Ballyvesey Holdings is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** - Ballyvesey Holdings uses only specified, reputable employment agencies to source labour and where not possible seeks to verify the practices of any new agency it is using before accepting workers from that agency.

Compliance

Ballyvesey Holdings Limited assesses compliance in its existing supply chain and will continue to undertake due diligence when considering taking on new suppliers to include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on supply chain mapping
- conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular as evidenced by our participation in "Stronger Together" initiatives;
- Invoking sanctions against suppliers who fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship;

Performance indicators

During 2020 there were no reported incidents or investigations associated with modern slavery and or human trafficking in Ballyvesey Holdings Limited or in any of its autonomous business units. The organisation continues to review its key performance indicators around modern slavery and human trafficking and as a result we will continue to:

- require all staff working in procurement and HR to have completed training on modern slavery;
- develop a system for supply chain verification prior to supplier on boarding; and
- review existing supply chains

Recruitment & Training

Ballyvesey Holding Limited undertakes selective pre-employment screening, references, conducts identity checks and confirmation of entitlement to work in the United Kingdom on all employees prior to commencement of employment. These measures have extended into 2020 and have been heightened by the United Kingdom's departure from the EU.

New employees are given an overview of the essential policies and information in relation to Ballyvesey Holdings Limited policies, procedures and other matters such as whistle blowing, dignity at work, and equality. Looking ahead into 2021 and 2022 the introduction of a centralised H&S and HR online training portal and employee engagement platform will heighten levels of awareness,

information and communication. Part of this exercise we see the development of a centralised dashboard to provide uniformity and heightened visibility to management teams around employee training. For all employees the ongoing process of training and communication around modern slavery and human trafficking with continue unabated utilising the very effective resources provided by Stronger Together across all media formats.

Awareness-raising programme

As well as training specific staff, the organisation has raised awareness of modern slavery issues by utilising the Stronger Together portfolio of multimedia resources to communicate, to highlight, to inform, to advise and to support, focusing on the key aspects of:

- the basic principles of the Modern Slavery Act 2015;
- how employers and employees can identify and prevent slavery and human trafficking;
- what we all can do to highlight slavery or human trafficking issues to the relevant parties within the organisation and beyond;

Board approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, for the financial year ending 30 September 2020. It applies to Ballyvesey Holdings Limited and has been approved by the Board of Directors.

Signed by: *Colin Montgomery*
Chief Executive

Date 26 March 2021