



## THE UNIPART GROUP OF COMPANIES

**POLICY TITLE:** MODERN SLAVERY POLICY

**VERSION NUMBER:** 1.0

**APPROVED BY:** GROUP EXECUTIVE COMMITTEE

**APPROVAL DATE:** 3 FEBRUARY 2016

**EFFECTIVE DATE:** 3 FEBRUARY 2016

### 1. Introduction

The Modern Slavery Act 2015 (“the Act”) came into force in October 2015. This Act requires Unipart Group of Companies Limited (“Unipart”) to state publically the steps that have been taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of its business or any of its supply chains.

The statement must be approved by the Unipart Board, signed by a director and published on the Group’s website.

### 2. Policy

Unipart is committed to conducting business fairly, transparently, honestly and openly. We seek to operate responsibly wherever we work in the world and to engage with our stakeholders to manage the social, environmental and ethical impact of our activities in the different markets in which we operate.

It is the policy of Unipart that each company within the Unipart Group and each director, officer and employee of any Group company will comply in all respects with all applicable UK laws, and (in addition and where relevant) local laws of overseas countries, standards and principles relating to Modern Slavery (as defined in the Act) in each of the jurisdictions in which a Unipart company trades, operates or has any other activity. Companies within the Group will establish and enforce effective compliance procedures including their supply chains and the Group will publish an annual statement in accordance with the Act.

### **3. Scope**

This policy applies to Unipart and all its subsidiary companies globally.

### **4. Purpose**

The purpose of this policy is to ensure compliance with the applicable Modern Slavery laws and Unipart's commitment to conducting business the Unipart Way.

### **5. Responsibilities**

Divisional Managing Directors and their senior management team are responsible for ensuring that the division for which they are responsible complies fully with the Act and the policy. Within Group Staffs, compliance responsibility rests with Functional Department heads and their senior management teams.

Managing Directors and the Functional Heads in Group will be responsible for providing the information necessary to enable the Board to make the slavery and human trafficking statement for each financial year.

The Company Secretary will co-ordinate the provision of information by the Managing Directors and Function Heads for the Board and arrange for the annual statement to be approved by the Board for publication.

The Director of Corporate Responsibility will be responsible for ensuring that the Board approved statement is published on the Corporate Responsibility section of the Unipart website in accordance with the Act.

### **6. Further Information and Guidance**

Clarification on any aspect of this policy or the application of the Modern Slavery Act can be obtained by contacting the Company Secretary's Office or the Group Legal department.

### **7. Compliance Checklist**

- i) Describe your supply chain relationships in each territory in which your supply chain operates
- ii) Describe the risk assessment process undertaken to identify any parts of your supply chain which may be vulnerable to modern slavery risk
- iii) Specify any parts of your supply chain identified as at risk

- iv) Where risks of slavery and human trafficking have been identified, describe the steps taken to assess and manage the risks identified
- v) Identify how the effectiveness of the steps taken are measured
- vi) Identify what training about slavery and human trafficking is available to relevant staff

## **8. Approval and Publication of the Statement**

Each part of the business will provide responses to the subject areas included in the Compliance Checklist and return these to the Company Secretary's office. Based on these responses, the Company Secretary's office will prepare a Slavery and Human Trafficking Statement for the Board to approve and sign in readiness for publication after the end of each financial year.