

## Modern Slavery and Human Trafficking Transparency Statement

## Heatons Truck Group Limited

**This statement has been produced in pursuance of the Modern Slavery Act 2015 Section 54.**

**Relating to the actions and activities taken by the Heatons Truck Group Limited's financial year February 1 2018 - January 31 2019**

The Heatons Truck Group Limited (Heatons) is a privately owned company consisting of Woodward's TVC and Heatons Truck & Trailer Parts (which are Divisions of Heatons Truck Group Ltd Reg. No.00487572. North West Trucks and North West Truck and Trailer Parts ( which are Divisions of North West Truck Services Ltd Reg. No. 2147882 a wholly owned subsidiary of Heatons Truck Group Ltd)

The Group has four locations in the North West of England and holds franchises for two HGV Truck Manufacturers who they represent within this area. Employing around 140 staff the businesses are predominantly engaged in working with their Franchised Partners, supplying HGV Trucks and Parts and providing after sales support through repair, maintenance and breakdown cover.

Modern day slavery can take many forms, such as servitude, forced labour, compulsory labour and human trafficking.

Such activities are an affront to human dignity, an offence in UK law and contrary to the values of the Heaton Truck Group

The Heatons Truck Group is committed to ensure that slavery and human trafficking is not taking place within its directly employed workforce and recognize their responsibilities towards making their best efforts to mitigate modern slavery and human trafficking being in place within its supply chain.

### Supply Chain

Most suppliers are based in the North West and have a history of dealing with an Heatons company.

As a consequence Heatons management believe the majority, if not all its suppliers are considered to be of "a low risk" of being directly involved in modern day slavery. The profile of suppliers that Heatons employ, helps to prevent the purchase of products at unrealistic low prices that can lead to suppliers using labour on very low wages that are below "the minimum wage"

Heatons expect all their suppliers:-

- to be aware of the requirements of the Slavery Act and to be aware that it is their responsibility to act in an ethical manner and to conduct its business in compliance with applicable legislation and do not engage in any forms of slavery in accordance with the Modern Slavery Act.
- To ensure that all their employees are engaged in-line with all applicable laws and regulations
- Do not tolerate any forms of discrimination within its company or its subcontractors
- Ensure the safety of its personnel and third parties

The two Franchised Partners of the Heaton Truck Group are multi-national companies who are:-

- DAF Trucks NV based in Holland a subsidiary company of Paccar Inc. with headquarters in Seattle USA
- Renault Trucks SAS who are based in France a subsidiary company of the Volvo Group with headquarters in Gothenburg Sweden.

These two companies supply Heatons with all the Trucks they sell and 90% of the Parts sold.

In the financial year 2017/18 this represented 84% of Heatons total turnover, this in line with previous years. Heatons Truck Group have no influence over the DAF and Renault Companies compliance with the Modern Slavery parent Act.

Heatons expectations are that both companies implement their Modern Slavery statements as published on their respective Website

## Work Place

Heatons have a number of internal procedures to ensure that they conduct their business in an ethical and transparent manner offering:-  
All employees an environment that is free from harassment and unlawful discrimination.

- They ensure that working practices are in accordance with the Equality Act 2010 and all employment legislation.
- That an open and transparent grievance process is in place for all employees.
- The Finance department who are responsible for paying salaries and wages throughout the group; regularly carry out reviews to ensure all staff are paid in accordance with National Minimum Wage and work within their contracted hours.

Managers who are responsible for recruitment adhere to the company/ies recruitment procedures including the vetting of identities and all employees are paid both directly and correctly. This procedure is carried forward to all employees that are recruited through an Agency.

The Agencies used are reputable companies with a long standing relationship with the Heatons companies.

Actions to be taken in the forthcoming Financial Year:-

- Staff training to further promote Modern Slavery awareness.
- Posters explaining the basic principles of the slavery act will be posted around the companies locations and within its Intranet.
- A new Suppliers Terms and Conditions document will be sent to all suppliers demanding compliance with the provisions contained within the Slavery Act 2015 and the General Protection Regulations (GDPR ) legislation May 2018.
- To improve the understanding of the business's within the supply chain to be able to identify any potential risks of modern slavery and therefore be in a position to produce meaningful performance indicators,

The Staff Handbook to be revised to show the obligations the company has towards the Modern Day Slavery act 2015 these include:-

- The basic principles of the Slavery and Human Trafficking Act together with the companies commitments to complying with the act.
- How employees may help identify and prevent modern day slavery taking place within their workplace or within the Heatons supply chain.
- A whistle blowing procedure to be introduced that will include staff being asked to report to their Line Manager or a Director, any concerns they may have as to how a colleague/s is being treated, without a fear of reprisal.
- A proviso that any member of staff found breaching company policies will be subject to suitable disciplinary action that may include dismissal.

**This statement has been approved by the organizations Board of Directors and will be reviewed and updated annually.**



**Charles Pettingell Director and Secretary**







### **Work Place**

Heatons have a number of internal procedures to ensure that they conduct their business in an ethical and transparent manner offering: -

- all employees an environment that is free from harassment and unlawful discrimination.
- ensuring that working practices are in accordance with the Equality Act 2010, the working time directive and all employment legislation
- an open and transparent grievance process for all employees

The Finance department who are responsible for paying salaries and wages throughout the group; regularly carry out reviews to ensure all staff are paid in accordance with National Minimum Wage and work within their contracted hours.

Managers who are responsible for recruitment adhere to the company/ies recruitment procedures including the vetting of identities and all employees are paid both directly and correctly. This procedure is carried forward to all employees that are recruited or employed on a temporary basis through an Agency. The Agencies used are reputable companies with a long standing relationship with the Heatons companies.

Actions to be taken in the forthcoming Financial Year

- Staff training to further promote Modern Slavery awareness.
  - Posters explaining the basic principles of the slavery act will be posted around the companies locations and within its Intranet.
  - Terms and Conditions used for suppliers will be sent to all suppliers demanding compliance with the provisions contained within the GDPR legislation May 2018 and the Slavery Act 2015.
  - To improve the understanding of the businesses within the supply chain in order to be able to identify any potential risks of modern slavery and therefore be in a position to produce meaningful performance indicators
  - The Staff Handbook will be revised to show all obligations the company has towards the Modern Day Slavery act 2015 that will include the basic principles of the Slavery and Human Trafficking Act together with the companies Modern Day Slavery Policy and the commitments towards ensuring that human trafficking is not taking place within the work place either within the Company or within its supply chain.
  - To explain how employees may help identify and prevent modern day slavery taking place within their workplace or within the Heatons supply chain.
- A whistle blowing procedure will be introduced and included in the handbook. Staff will be asked to report to their Line Manager or a Director
- a) Concerns they may have as to how a colleague/s is being treated, without a fear of reprisal.
  - b) Any evidence they may have of slavery or human trafficking taking place within their workplace or the supply chain.
- A proviso That any member of staff breaching company policies will be subject to suitable disciplinary action that could include dismissal

This statement has been approved by the organization Board of Directors and will be reviewed and updated annually.



Charles Pettingell Director and Secretary

