

Modern Slavery and Human Trafficking Transparency Statement

Heatons Truck Group Limited

This statement has been produced in pursuance of the Modern Slavery Human and Trafficking in accordance with the Modern Day Slavery Act 2015. The scope of this policy applies to Heatons Truck Group Limited (“Heatons”) and its Employees, Franchise and Manufacturing Partners and Suppliers of Goods and Services engaged in business with Heatons. The Heatons Group 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.

Heatons hold ISO 9001, ISO14001 and an FCA accreditations within its businesses.

This statement covers Modern Day Slavery and Human Trafficking and sets out the steps Heatons take to ensure slavery and human trafficking are not taking place within its directly employed workforce or supply chain for the Financial year beginning February 1st 2020 and ending 31st January 2021.

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

Supply Chain

Most suppliers are and based in the North West of England, relatively small in size with a history of dealing with a 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 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

Heatons have a zero tolerance for breaches of the Modern Day Slavery Act and has in place policies, processes, and whistle blowing and auditing procedures to ensure that any business within the scope of the policy complies accordingly. Heatons will terminate any commercial relationship with suppliers if they are in breach of our policies and found to have been involved in any form of Modern Day Slavery.

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 new Trucks they sell and 90% of the Parts sold.

Heatons Truck Group has no influence over the DAF and Renault Companies compliance with the Modern Slavery Act.

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

Work Place

Heatons make every effort to ensure that their businesses are conducted in an ethical and transparent manner. Offering all employees an environment that is free from harassment and unlawful discrimination. Procedures in place to achieve these goals include:-

- That an open and transparent grievance procedure 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.
- Recruitment processes are transparent with appointments approved by Directors. There are robust procedures in place for vetting new employees, allowing us to confirm identities. These procedures are also used if an agency is engaged to recruit an employee on a permanent or temporary basis.
- Training includes explaining to employees how they may help identify and prevent modern day slavery taking place either within the company or its supply chain
- Training is provided to Heatons management teams, on their responsibility to ensure the Companies adherence to the Modern Day Slavery Act.
- A whistle blowing procedure is in place whereby staff are encouraged to report to their Line Manager or a Director:-
 - a) Concerns they may have as to how colleague/s is treated; without fear of reprisal.
 - b) Any evidence they may have with regard to any form of slavery or human trafficking taking place within their work place.
- Any breach of their Modern Day Slavery policy by an employee will result in disciplinary action that could result in dismissal for gross misconduct.

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



Charles Pettingell Director and Secretary