



## John Clark Motor Group

### **Slavery and Human Trafficking Statement made on behalf of John Clark Holdings Ltd and its subsidiary companies further to the provisions of the UK Modern Slavery Act 2015**

#### **Statement by the Chairman of John Clark Holdings Limited**

We are proud of the terms and conditions of employment afforded to all our employees throughout John Clark Holdings and its subsidiary companies – John Clark Motor Group. Given the nature of our business, our Board and Management Teams each consider that there is minimal risk, approximating to no risk, either within the John Clark Motor Group or the supply chains who support our business activities, there are in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking. The employment practices operated by the businesses within John Clark Motor Group ensure we are viewed as a employer of choice. John Clark Motor Group businesses operate as a purchaser of goods or services they expect a high level of ethical conduct from those companies and customers with which they do business within the supply chain.

#### **Organisation's Structure**

John Clark Motor Group is the holding company for motor retailing businesses who are independent family owned, representing a number of franchised brands in the sector. John Clark Motor Group makes every effort to provide a brand specific retail environment for its customers and staff. The trading companies and franchised businesses within John Clark Motor Group are regulated by the FCA.

#### **Trading Sites and Supply Chains**

John Clark Motor Group principal activities are motor vehicle sales and servicing, the supply of replacement parts, the repair of accident damaged vehicles and the rental of properties. The John Clark Motor Group geographically cover an area from the Northeast of Scotland to Edinburgh, with the head office in Aberdeen.

In respect of John Clark Motor Group's supply chain, as part of our due diligence process, we use our reasonable endeavours to conduct company checks and assessments of the third parties we work with and investigate, where feasible.

We take steps to assess and manage this risk which includes requesting updates of our supply chains which fall in countries where protection against breaches of human rights are limited. We aim to work with our staff and suppliers to ensure collaboration to remedy or mitigate such risks.

#### **Anti-Slavery Policy Statement:**

John Clark Motor Group operate a zero tolerance policy in regards to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.



## John Clark Motor Group

This Anti-Slavery Policy Statement is the principal articulation of John Clark Motor Group policy on slavery and human trafficking. It is intended to inform and influence all the operational procedures within our trading activities.

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. For further information, please see your Line Manager. Alternatively, any concerns in this regard should be raised through the Whistleblowing Policy

### **Due diligence and implementation processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to the different companies within the John Clark Motor Group. These include the policies and procedures in the following areas:

- Management Training
- Recruitment and Equal Opportunities Policy
- Money Laundering Policy
- Bribery and Corruption Policy
- Whistleblowing Policy

John Clark Motor Group also articulate a series of employee rights and benefits available to its employees in the employee intranet and individual contracts of employment for each member of staff.

### **Controls and Accountability**

Every department and their respective managers have reporting responsibilities to management and the various Boards of companies within the John Clark Motor Group

John Clark Motor Group engages the service of external auditors and receives as well as the internal auditing. A combination of these procedures help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chains.

It should be specifically noted that John Clark Motor Group operates in line with the NLW and NMW regulations.

### **Training**

We communicate this statement is to all Managers ensuring a high level of understanding of the risks of modern slavery and human trafficking in supply chains.



## **John Clark Motor Group**

### **Legal and Regulatory Compliance**

This statement is made with regard to the obligations arising under section 54(1) of the UK's Modern Slavery Act 2015 (the Act).

### **Conclusion**

This statement should be considered to constitute the Slavery and Human Trafficking statement for the John Clark Motor Group and all its trading entities for the 2021 financial year and all future financial years until it may in future be modified or amended.

**John Clark  
Group Chairman**