

MODERN SLAVERY STATEMENT 2023

This statement is made in accordance with section 54 of the Modern Slavery Act 2015. It constitutes Car Giant Limited's (Cargiant) Modern Slavery statement for the financial year ending 31 December 2022.

This statement outlines Cargiant's statement in line with The Modern Slavery Act (2015). Cargiant continues to recognise that Modern Slavery is an on-going battle that requires attention and preventative measures to combat acts relating to trafficking, slavery, servitude and forced labour within a business. It is our responsibility to ensure our approach fights against such violations within the business, and our supply chain, and we will continue to review and improve our approach and policies to support human rights.

About Cargiant's structure

Cargiant is the largest used car dealership in the world and operates from a single site in North West London. Its primary activity is the sale of used vehicles and also arranges finance to enable customers to purchase vehicles. Cargiant employs circa 530 employees directly and also works with suppliers to provide a wide range of goods and services.

Our suppliers are predominantly based in the United Kingdom and we endeavour to only use reputable suppliers. Our supply chain consists primarily of suppliers of goods and services related to the automotive industry as well as professional advisors and financial services organisations.

Our policies

Cargiant operates an Anti-Slavery policy which has been reviewed and updated. This is readily available on the Company's intranet and is contained within the Employee Handbook. The Company also operate a number of additional policies and procedures which relate to Anti-Slavery and our commitment to conduct business in a fair, ethical and transparent manner. These include:

- Recruitment & Selection – Highlights our commitment to recruit and select employees in a fair, lawful and non-discriminatory manner and to ensure that all eligibility to work in the UK checks are completed for all directly and indirectly employed staff. This also outlines our expectation that any external recruitment agencies act in accordance to this policy.
- Equal Opportunities – highlights our commitment to promoting equality of opportunity for all staff and job applicants and extends to the way in which staff treat each other, our customers and suppliers. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment and equality of opportunity in relation to pay, training and development opportunities.
- Bullying and Harassment - We aim to ensure that all staff are treated, and treat others, with dignity and respect at work and out of the workplace, including on work related functions.
- Whistle Blowing – ensuring staff are aware that they can raise concerns confidentially including suspicions relating to risks involving violations of human rights.
- Grievance procedure – providing a fair and transparent process for all employees to raise serious concerns regarding their employment.

Our suppliers

Whilst not all our suppliers may need to publish a statement, it is important that they share our values and commitment to tackling modern slavery. As such, we have introduced Modern Slavery clauses within all our existing supplier contracts and will endeavour to ensure all future contracts include Modern Slavery clauses to ensure compliance with our policy and the Act.

The Company will carry out audit of our suppliers at random to ensure they conduct their business in a manner that is consistent with Cargiant's Anti-Slavery policy. Cargiant is committed to continuously improving its practices to identify and eliminate slavery and human trafficking in its business and supply chains, and to act ethically in all its business relationships.

Due Diligence, Assessment and Effectiveness

Our due diligence has not identified any instances of human trafficking or slavery, within our business or supply chain. The Company will continue to raise awareness amongst our existing employees as part of internal communication and for new joiners through our onboarding process.

In addition, we will ensure that all people employed, directly and indirectly, have the right to work in the UK and appropriate checks are carried out by the HR department. This will include carrying out the necessary checks following the nation's recent exit from the European Union.

Any concerns raised regarding slavery or human trafficking will be recorded on an internal Company register and investigated accordingly, within both the Company and its supply chains.

Training

We will continue to raise awareness about our Anti-Slavery policy and provide advice and guidance to our employees and those who have direct responsibility for managing staff, to ensure adherence. All managers including those newly promoted, have completed training on the Modern Slavery Act and how to identify and report incidents within the workplace or supply chains.

We shall continue to train and retain our Managers on our Equality and Diversity, and Recruitment and Selection policies and practices, to develop their understanding of the behaviours and factors that could amount to modern slavery. This is a developing programme which will continue to raise awareness on policies related to Anti-Slavery.

This statement has been approved by the Directors of the Company and will be updated annually in line with the Modern Slavery Act's reporting requirements.

Michael Holahan
Managing Director
March 2023

