



# FAI Automotive plc

## MODERN DAY SLAVERY – FAI AUTOMOTIVE PLC POLICY

The scope of this policy applies to FAI Automotive plc and the Employees and Suppliers of Goods & Services engaged in business with FAI Automotive plc.

The Policy covers Modern Day Slavery and Human Trafficking in accordance with the Modern Day Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Modern Day Slavery and Human Trafficking can take on many forms such as; slavery, servitude, forced labour, compulsory labour and human trafficking. This may manifest itself practically in instances of restricted freedom of movement or decision making by individuals, the provision of shared accommodations and central payment for services to a single person (for paying individuals later).

Such activities are an affront to human dignity, an offence in UK law and completely contrary to the values of FAI Automotive plc.

FAI Automotive plc is committed to complying with its obligations under the Modern Day Slavery Act and other relevant legislation relating to the detection and prevention of modern slavery. In particular, FAI Automotive plc is committed to implementing and enforcing effective systems and controls that seek to ensure that modern slavery is not taking place anywhere in its business or in its supply chains.

### Policy

The Company has zero tolerance to breaches in the Modern Day Slavery Act and has in place policies, processes, whistleblowing and auditing procedures to ensure that any organisation within the scope of the policy who transacts business with FAI Automotive plc complies with it.

The Company expects that any organisation within the scope of the legislation will also apply the same high standards.

### Compliance

The company will maintain its compliance with the policy as follows: -

1. Maintaining and updating HR policies in line with legislation and best practice.
2. Following our FAI Automotive plc recruitment policies.
3. Recruiting as a minimum to the National Minimum Wage level and employees achieving the National Living Wage within 12 months of joining the company.
4. Tracking, monitoring and preventing the risk of occurrence through diligent management.
5. Audit where applicable.
6. Investigating thoroughly any issues/concerns detected.
7. Apply sanctions against those supplier organisations who do not conform to legal requirements.
8. Communicating with employees.
9. Provide appropriate / relevant training and guidance to employees.
10. Provision of confidential 'Whistleblowing' service.



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## **Procedure**

Our recruitment processes are transparent with appointments approved by Senior Managers or Directors. There are robust procedures in place for the vetting of new employees that enables us to confirm their identities and ensure they are both paid directly and correctly.

All departments entering into a business relationship with a supplier, contractor or business partner are to at the outset of our business relationship with them provide them with a copy of this policy. Where a potential supplier is able to demonstrate compliance with the Modern Day Slavery Act 2015 via a statement on their website we should attach a copy of their statement to our new account form. All suppliers should complete our '**Supplier Confirmation Statement**' (see attached pro forma).

## **Implementation**

FAI Automotive plc will be responsible for implementing this policy and ensuring that all colleagues are aware of the policy by making it available to view on the company intranet(s).

Managers and their teams will be responsible for ensuring that FAI Automotive plc has on record for suppliers within the scope of the policy a signed FAI Automotive plc declaration of compliance.

## **Responsibility for the Policy**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The prevention, detection and reporting on modern slavery in any part of the Company's business is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

The company will introduce appropriate arrangements to monitor the application of and use of this Policy, dealing with any queries about the policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

## **Communication and Awareness of this Policy**

The Board of Directors will communicate the Policy in accordance with statutory legislation.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **Reporting of breaches**

If you believe or suspect a breach or conflict with this policy has occurred or may occur, you must notify your line manager or the Managing Director. These breaches (suspected or actual) are to be passed to the Board of FAI Automotive plc so that they can be reported to the national authorities (as required by the National Referral Mechanism (NRM)).

You must raise concerns about any issue or suspicion of Modern Day Slavery in any part of the Company's business as soon as possible. If you are unsure about whether a particular act, the treatment of workers or



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their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager or alternatively by use of the confidential hotline service.

FAI Automotive plc will support anyone who raises a genuine concern in good faith under this policy. The company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of the business or in any of its supply chain.

## **Breaches of the Policy**

Any breach of our Modern Day Slavery policy by any employee will result in disciplinary action which could result in dismissal for gross misconduct.

The company will terminate any commercial relationship with suppliers if they are in breach of our policy and/or are found to have been involved in modern slavery.

(Policy Version / Updated) **9 January 2024**



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## Modern Day Slavery & Human Trafficking – FAI Automotive plc Policy

### Supplier Confirmation Statement

..... (insert name of your company) confirm that we have read and understand the FAI Automotive plc Modern Day Slavery & Human Trafficking Policy and understand that FAI Automotive plc does not accept any form of modern slavery or other abuse of human rights in their operations.

**By signing the below we confirm we have our own policy in place and have attached a copy of this or where we are not required by law to have our own policy, we are in agreement with the FAI Automotive plc Modern Day Slavery & Human Trafficking Policy.**

Signed .....

Print Name .....

**Position held (Must be an Officer of the Company) .....**