

S&P Brisley Accident Repair Centre – Modern Slavery Policy Statement

S&P Brisley is committed to ensuring that it is not complicit in any acts connected to slavery, forced labour or human trafficking as outlined in the Modern Slavery Act 2015. The Company will not trade or partner with any business or organisation which is involved in such practices however remotely or indirectly.

The Company undertakes, so far as is reasonably practicable, to eradicate risks in its supply chain and expects its directors, employees, suppliers and contractors (whether temporary or permanent) to demonstrate a zero-tolerance approach to exploitation and therefore anticipates that its exposure to modern slavery is negligible, if existent at all. The Company, and those in the supply chain, are also expected to comply with the Asylum, Immigration and Nationality Act 2006.

S&P Brisley expects its employees to fully observe and adhere to any policies or procedures introduced, including utilising the whistleblowing policy (see below) which allows employees to report any concerns confidentially. As well as taking appropriate action against employees in the event of a breach, suppliers and contractors considered to be guilty of the same should expect to be removed from the Company's approved list.

Simon Brisley

Director

Updated July 2023

S&P Brisley Accident Repair Centre – Due Diligence Review for Modern Slavery

Structural Considerations

S&P Brisley is an SME carrying out accident repairs, primarily on behalf of insurance company policy holders, and employs less than 30 workers. Inevitably the business is supported by a supply chain largely made up of large corporations and small local businesses. *No changes.*

Staffing

Employees are informed about the Company's policy and the implications of the Modern Slavery Act on commencement, including the expectation that all workers (directors, employees, subcontractors, suppliers etc.) must comply with the Act. Whilst breaches remain considered to be unlikely and not immediately identified by employees, they are reminded that the reporting mechanism for such matters is identified in the Company's whistleblowing policy. *All current staff to receive further instruction or information outlining the Company's commitment to addressing modern slavery and human trafficking.*

Supply Chain Requirements

Goods and services are only permitted to be purchased from companies identified on S&P Brisley's approved suppliers list. *No high risk issues identified. No changes.*

One of the requirements for an approved supplier is to demonstrate adherence to the Modern Slavery Act. Demonstration of this needs to be appropriate to the nature and scale of those in the supply chain. Ultimately, achieving approved supplier status falls to the Directors. It is anticipated, for example, that large corporations will provide comprehensive statements and demonstrate suitable arrangements to discharge due diligence. Moreover, the nature of these business, the need for them to comply with the Act, and the public scrutiny that they fall under enhances opportunities to identify potential breaches. In the case of SMEs, in the absence of significant demonstrable policies and procedures to address compliance, they will be required to guarantee adherence to the Act by express inclusion in subcontractor agreements necessary to remain approved suppliers. *Approved supplier status to be reviewed for supply chain. 'Local' knowledge to continue to be used.*

Reasonable effort to be made to prevent expansion of supply chain, thereby keeping management and monitoring requirements, plus potential breaches to a minimum. *Rule of thumb remains 'one in, one out' so far as reasonably practicable.*

So far as is reasonable assess the origin of goods and services. *No issue with services. Direct good purchases made from UK and EU only. No high risk geographical concerns raised.*

Carry out suitable due diligence checks prior to changes to the supply chain. *Continue with approved repair requirements but add express requirement for review and sign off by the Directors prior to change.*

Risk

No high risk of exposure to modern slavery and human trafficking has been identified. *It is acknowledged that risk exists, however the above measures (in particular the review of staff awareness, approved supplier arrangements and a limited, but monitored supply chain) is considered adequate to identify the potential for high risk.*

Breach

In the event of a direct or indirect breach being identified in the supply chain (identified by staff, locally observed, reported in the press, following (intended) prosecution etc.) S&P Brisley's default system will be to investigate or make enquiries as appropriate with a view to ceasing use of the supplier implicated in the breach. *No changes.*

Simon Brisley

Director

July 2021