

Modern Slavery Statement

Slavery and human trafficking statement as required under s54, Part 6, of the Modern Slavery Act [1] 2015.

Organisation structure and supply chains

General Traffic Limited is registered in England and Wales under company registration number 01730603. Registered office: Rutland Mill, Adelaide Street, Bolton, United Kingdom, BL3 3NY.

General Traffic's principal activity concerns the wholesale distribution of automotive aftermarket parts, consumables, maintenance, accessories and retail products facilitated through a network of 31 branch sites located across the UK.

General Traffic's supply chains consist of original equipment manufacturers and distributors appointed as supply partners after detailed assessment of regulatory compliance and financial stability.

Policies in relation to slavery and human trafficking

General Traffic's employment policies enforce zero tolerance of harassment and unlawful discrimination and outline working practices to ensure all employees are treated fairly, equally and are paid at least the national minimum wage. Employees will not be forced to work in excess of the number of hours permitted in law, and normal working hours do not exceed an average of 48 hours per week unless the employee agrees.

General Traffic expects all supply partners to perform their services in accordance with our anti-slavery policy and enter into contract terms to ensure such compliance. Emphasis is placed on selecting suppliers and service providers that demonstrate recognisable compliance with laws and regulations, respect for human rights, labour working conditions, equal opportunities and health and safety accreditation.

General Traffic encourages all employees, customers, and other business partners to report any concerns related to the direct activities or the supply chains of General Traffic, in the event of any circumstances that may give rise to an enhanced risk of slavery or human trafficking, without fear of retaliation.

Due diligence processes

General Traffic is committed to conducting purchasing and trading activities in a fair, objective, and transparent manner through satisfaction of legal and financial obligations and effective management of commercial risk.

Due diligence is performed in relation to slavery and human trafficking through a procurement process evaluating the modern slavery and human trafficking risks of each supplier on a periodic basis for existing suppliers and when considering taking on new suppliers.

When a supplier is deemed to be higher risk by country of origin and/or lack of suitable policy/processes, an investigation is raised and assessed by directors which can result in the supplier being inactivated.

Risk assessment and management

General Traffic believe the principal area in which there is a risk of human trafficking and slavery is in relation to its supply chains. Initial analysis has not yielded any concerns in General Traffic's present supply chains as direct supply is sourced from organisations that are themselves required to publish statements setting out the steps they have taken in this regard. General Traffic have reviewed those statements where available and will continue to do so periodically.

General Traffic will invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate anti-slavery policy, including the termination of the business relationship.

Key performance indicators to measure effectiveness of steps being taken

To measure how effective the steps taken to ensure that slavery and human trafficking is present any part of General Traffic's business or supply chains, the following key performance indicators (KPIs) are used:

- Record of training undertaken by staff
- Use of labour monitoring and payroll systems to ensure compliance with National Minimum Wage and Working Time legislation
- Record of supplier agreements including the requirement to comply with legislation and policies against slavery, servitude, forced or compulsory labour and human trafficking

Training on modern slavery and trafficking

Training is provided to all current and new staff to deliver a high level of understanding of the risks of modern slavery and human trafficking across General Traffic's supply chains and business which includes ensuring all staff can identify any issues and are aware of how to report them.