

Modern Slavery & Human Trafficking Statement

What is Modern Slavery?

The term 'modern slavery' refers to various types of abuse where workers are treated as a commodity, forced to work under threat of punishment or violence or forced to provide services without the freedom to leave (such as employers retaining passports).

Modern slavery is not only a developing world issue but an increasingly global concern with the rise in migratory workers. Slavery includes child labour, debt bondage (working to repay a loan or debt), forced labour or domestic servitude (being forced to work, often under threat of violence, for little or no compensation), human trafficking and sexual exploitation.

Migrants, minorities, women, children, and those who are illiterate are more vulnerable to becoming victims of slavery and trafficking. Although there is a higher prevalence of modern slavery in regions such as Africa and Asia, it is present in more developed economies as vulnerable people are trafficked from abroad and forced into work.

What are the key risk areas faced by the Micheldever Group?

We only employ staff and sell our products and services in the UK and Ireland. We acknowledge that modern slavery can exist in our society, but we nonetheless believe that our local market focus reduces the risk of our business being affected.

We are an organisation that values trust and integrity in everything we do, and we ensure our people have the right training and opportunities to raise concerns at all levels of the business. We therefore think that the likelihood of modern slavery or human trafficking taking place within our business is very low.

Our supply chain is extensive and international. We purchase tyres from across Europe and Asia. A large proportion of our tyres are bought from our parent company (Sumitomo Rubber Industries, a Japanese public company) or other large multinational public companies, where we have a high degree of confidence that the systems and processes in place to mitigate the risk of modern slavery or human trafficking meet or exceed our own. We do purchase from several smaller manufacturers where we manage the relationship by a dedicated team.

Our domestic supply chain is predominantly served by large enterprises where the risks are expected to be relatively low (e.g. major UK mechanical part suppliers). The greatest risk in the domestic supply chain is in low value locally procured services across our portfolio of operating locations (e.g. cleaning) where there may be less visibility over who is providing these services and under what conditions.

What does Micheldever Group do to address the risk of modern slavery or human trafficking being present in its business or supply chain?

- Annual Confirmation from Suppliers: each year we request confirmation from our tyre and parts suppliers that their business, and the supply chains used by their business, are free from modern slavery. This confirmation may be obtained through the publication of their own Modern Slavery Policy Statement or in direct response to our enquiry.

- Supplier Visits to Small Asia Suppliers: site visits are conducted by senior representatives of our Purchasing department. These visits have not been possible to conduct during the Covid-19 pandemic. This means that our supply chain is currently exposed to greater than normal risk of the presence of undetected modern slavery or human trafficking. We will resume our site visits as soon as it is safe and practicable to do so.
- Promoting Awareness & Training: we have expanded, and continue to develop, our digital learning management system to ensure all of our staff have access to up to date and effective training modules to ensure general awareness of these issues and practical steps our people can take to detect and report any issues.
- Whistleblowing Policy & Hotline: we have a whistleblowing hotline for staff to report any issues that arise in a safe and confidential manner.
- Terms & Conditions: all newly issued terms and conditions include a clause that clearly states we will not work with businesses that are knowingly involved with modern slavery or human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2021.