

MICHELDEVER TYRE SERVICES CORPORATE POLICY

Policy Number:  
MTSCP-034

Issue Date:  
August 2023 V1.0

Revised Date:  
28/08/2024

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Policy Title:  
Modern Slavery Statement



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### **I. 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 & 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.

### **II. Micheldever's organisation structure and supply chains**

Micheldever Tyre Services is a one of the largest tyre wholesalers in the UK with a nationwide chain of independent fast fit and mechanical garages.

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 Global 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 a number of smaller manufacturers where there is less assurance that systems and processes in place are as robust as we would expect.

### **III. Policies in relation to slavery and human trafficking**

Our Code of Conduct and company policies set out the core standards and ethical behaviours that employees and contractors should apply in their daily work and embeds respect for human rights and labour rights across the business.

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### IV. Risk assessment and due diligence process

Micheldever Tyre Services is 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.

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.

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.

Our wholesale customer base is extensive and service-oriented so again there is some risk of undetected modern slavery or human trafficking in these operations.

### V. Measuring Effectiveness

We take all reasonable and practical steps to detect and mitigate modern slavery and human trafficking risk:

- **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. The plan is to visit these supplier in 2025. In 2024, we have requested confirmations from these suppliers that their business and the supply chains used by their business are free from modern slavery.
- **Whistleblowing Policy & Hotline:** we have an independent whistleblowing hotline (Safecall: 0800 915 1571 or [www.safecall.co.uk/report](http://www.safecall.co.uk/report)) for anyone within or outside Micheldever to report any issues that arise in a safe and confidential manner. In addition, we provide training to employees on whistleblowing to raise awareness.
- **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.

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### VI. Training on modern slavery and trafficking

We provide a digital Learning Management platform available to all of our staff, which they have access to up to date and effective training modules (including modern slavery and whistleblowing), these provide general awareness of these issues and practical steps our staff can take to detect and report any issues. Also, we enrol relevant staff to the modern slavery compulsory training course, 98% of the relevant staffs completed the modern slavery training course (August 2024). We continue to work with our staff to raise awareness of the issue and ensure they are effectively trained.

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 31st December 2023.

### VII. Document Clarification /Amendments / Errors:

In the event that any of the content within this document is unclear or inaccurate or any of the sections in the policy need to be changed as a result of planned business changes; please notify the document owner that is specified on page 1 of this document.

### VIII. Revision Record

Version	Revision / Change	Originator	Date	Approved By
1.0	Annual update on policy	Priscilla Luk	03/08/2023	Jon Cowles
1.1	Annual update on policy	Priscilla Luk	28/08/2024	Jon Cowles