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(Incorporating Endyke Tyres, Zr Tyres, Hiq Hull, Abbey Tyre Co, All Round Tyres, BAB Distribution)

Introduction

This statement sets out Bush Tyre's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

As part of the tyre distribution network, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Bush Tyres:

Tyre supply and fitting service for passenger car, commercial, agricultural and Industrial requirements. Working with retail, trade and account customers.

Countries of operation and supply

The organisation currently operates in the following countries:

UK only.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Manufacturing of raw materials (rubber plantations) which may involve forced or child labour.
- Casual Workers or agency staff responsibility which could involve labour exploitation in warehouses, logistics and distribution channels.



Responsibility for the organisation's anti-slavery initiatives is as follows:

Policies: Lawful policies are written and administered by NucleusHR Limited and carefully developed to eliminate human trafficking.

Risk assessments: Human rights are always at the forefront in the process of maintaining relevant workable risk assessments.

Investigations/due diligence: NucleusHR review all contracts, HR Policies and audit HR practices highlighting any risks and suggesting solutions.

Relevant approach & policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Modern Slavery Statement:** We do not tolerate slavery or human trafficking in any part of our business and are committed to ensuring this does not take place in our supply chains. This is documented in our Modern Slavery Statement in our Employee Handbook. We ensure that we act transparently, respectfully and with integrity in all our business relationships. We implement and enforce effective systems and controls to mitigate this risk.
- **Whistleblowing policy:** The organisation encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can complete our confidential disclosure form.
- **Employee code of conduct:** The organisations code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Wherever possible, either the directors or senior managers will visit the manufacturing facilities of our oversea suppliers to ensure that the highest ethical standards are upheld. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.



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- **Recruitment Policy:** We operate a robust Recruitment Policy, which includes conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- **Recruitment/Agency workers approach:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence.

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting supplier audits or assessments through a third-party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- creating an annual risk profile for each supplier.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through a third party auditor and requiring them to implement action plans participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular using a National database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular;
- and invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation has:

- developed a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain;
- and has reviewed its existing supply, whereby the organisation evaluates all existing suppliers.

Training

The organisation required supply chain managers along with all Senior Leaders within the organisation to complete training on modern slavery as part of the continuing professional development program.



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The organisation required supply chain managers to sign up and complete a number of training sessions that will be ran bi-annually, with the next sessions scheduled to be delivered in October 2024.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- and what steps the organisation should take if suppliers or contractors do not implement antislavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as onsite staff training, the organisation has a Toolbox Talk that will be delivered across the branch network by way of a refresher, in December 2024 and biannually thereafter.

In addition to staff training and tool box talks, the organisation has raised awareness of modern slavery issues by circulating a series of emails to supply chain staff, which will be sent to all staff bi-annually.

The emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking.
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.



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- and what external help is available, for example through the Modern Slavery Helpline.

Approval

This statement has been approved by the organisation's board of directors/members, who will review and update it annually.

Director's signature:



Director's name:

Nigel Bush

Date: 01.03.2024



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