



Modern Slavery Policy and Annual Statement

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1. Introduction

One of the Company's core values is that *"we build trust and integrity"*. It is committed to promoting and maintaining the highest level of ethical standards in relation to all its business activities. It's reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. The Company therefore has a zero-tolerance policy towards modern slavery and is committed to ensuring that all its business operations are free from involvement with slavery or human trafficking. This policy ensures that the company complies with Section 54 of the Modern Slavery Act 2015, and sets out the responsibilities for the employer and employees.

2. Purpose and Scope of Policy

This procedure applies to all employees of Nationwide Accident Repair Group Ltd (Section 54 of the Modern Slavery Act 2015 applies to all commercial organisations which carry on business or part of a business in the UK and have a turnover of £36 million or more per annum. Section 54 can therefore apply to non-UK registered companies).

3. Our Policy

Our policy is to assess and address the risks and violations of anti-human trafficking and anti-modern slavery laws. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the legislation. We have supporting principles with respect to human rights, labour, environment and anti-corruption. We support our people and customers to address issues arising from modern slavery. Together with leadership, excellence, agility, respect and responsibility we underpin our culture and how we do business.

We ensure:

- Our values, which are embedded throughout our business, set the perimeters for how we expect our people to behave with colleagues, customers and the community at large.
- We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted.
- Our policies and procedures relating to the modern slavery act are in line with our culture and values

Our Procedures

We have a number of procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

Employment

- Robust recruitment processes in line with UK Employment Laws, including 'Right to Work' document checks, Contracts of Employment and checks to ensure everyone employed is 16 years old and above
- Market related pay and rewards reviewed regularly
- Application of minimum wage regulations

Transparency in our supply chains

We recognise that our Company is exposed to greater risk when dealing with it's suppliers. We regularly review our supply chain and apply appropriate measures to manage identified risk.

We have a commitment to collaborate closely with suppliers to help them understand their own obligations.

Future Performance Indicators

Going forward we aim to introduce:

- Focused training in equality and diversity
- Regular measures and reporting on compliance in right to work and salary banding
- Publish gender pay reporting
- Audit compliance in our recruitment processes and documentation
- Apply dedicated confidential communication methods for whistle blowers

4. Annual Statement

Nationwide Accident Repair Group Ltd will publish an Annual Slavery and Human Trafficking Statement. The Head of the People Support Service Team is responsible for ensuring that this statement is published and reviewed on an annual basis. The Statement will explain the steps that Nationwide Accident Repair Group Ltd has taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any part of its own business.

5. Content of the Statement

The following items will be included in the Statement:

- The structure of our organisation, the business operations of the organisation and the supply chains
- Our policies in relation to slavery and human trafficking

- The due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains
- Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking take place, and the steps that we have taken to assess and manage the risk
- An assessment of the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, and the way that we assess and manage the risks that are identified
- A statement that training about slavery and human trafficking is available to all employees

6. Additional Action Points

In addition to producing the Annual Statement, Nationwide Accident Repair Group Ltd is committed to:

- Ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
- Ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
- Carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
- Ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
- Appointing a named individual to oversee the compliance with the Modern Slavery Act 2015
- Identifying and addressing any areas of high risk in our supply chain
- Providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking

SLAVERY AND HUMAN TRAFFICKING ANNUAL STATEMENT

Slavery and Human Trafficking remains a hidden predicament in our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

Nationwide Accident Repair Group Ltd will publish an annual slavery and human trafficking statement. A link to this statement will be on the homepage of the website and will be signed and approved by Michael Wilmshurst, CEO.

The Director of People Support Services is responsible for ensuring that this statement is published and reviewed on an annual basis.

The statement will explain the steps that Nationwide Accident Repair Group Ltd has taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any part of its own business.

Organisation's Structure

We are the largest privately owned Bodyshop Group in Europe. The Group has its head office at 17a Thorney Leys Park, Witney, Oxfordshire, OX28 4GE with over 126 sites spread across the country.

Our Business

Our business is organised into: Call Centre, Front Office Support Teams and Workshops.

Our Supply Chains

Our supply chains include the sourcing of parts related to the repair of vehicles and Insurance Companies.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implement and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk

- Where possible, we build long standing relationships with local suppliers and customers and make clear our expectations of business behaviour
- We have in place the reporting of concerns and the protection of whistle blowers

Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

All departmental Directors are responsible for compliance in their respective departments and for their supplier relationships.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supplier chains and our business, we provide training to relevant members of staff. All Directors are fully trained on the subject.

Training about slavery and human trafficking is also available to all employees.

Our Effectiveness in Combating Slavery and Human Trafficking

In addition to producing the Annual Statement, Nationwide Accident Repair Group Ltd use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
- Ensure 'right to work' completed
- Gender pay reporting published
- ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
- carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
- ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
- appointing a named individual to oversee the compliance with the Modern Slavery Act 2015
- identifying and addressing any areas of high risk in our supply chain
- providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking

This Statement is made in accordance with Section 54 (1) of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking Statement for the current financial year

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DATED

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Michael Wilmshurst
Chief Executive

Review Date & Revision History

This policy will be subject to periodic review in line with changing employment legislation and best practice. Any amendment to it will be advised to employees via a policy and procedural change document which will be communicated by the Organisation's Management Team. The next formal review will be in January 2019.

Version	Date	Name	Overview of Changes
1.0	01.01.17	Louise Cope	Rebranded and reviewed in line with legislation changes and to include all group policies
2.0	30.05.18	Christine Dalton	Reviewed in line with legislation changes and to include all group policies

Document Acceptance and Release Note

For identification of amendments, each page contains a version number and page number.

Changes other than appendices will only be issued as a complete replacement document.

Recipients should remove superseded version from circulation.

Name	Signature	Job Title	Date
Christine Dalton		Head of HR Shared Services	30.5.2018
Darren Gagan		Head of HR Operations	
Louise Cope		People Director	
Michael Wilmshurst		Chief Executive Officer	