

# Treleigh Holdings Ltd Modern Slavery Policy Statement

### Introduction

We are committed to respecting human rights and ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships, in line with our core values.

This policy statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Treleigh Holdings Ltd and other relevant group companies.

Treleigh Holdings Ltd includes:

- WES Engineering Solutions Ltd
- BC Car Parts Ltd

## Our organisation and supply chains

WES Engineering Solutions are a subcontract precision engineering company. Our client base includes automotive manufacturing plants including Jaguar Landrover, Nissan, Vauxhall and BMW. We also supply to customers within the oil and gas, nuclear, subsea and aerospace industry. Our classic car sector sells directly to consumers and to the trade.

Our business, including our supply chains, is primarily carried out within the UK. This statement is applicable to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, contractors, external consultants, third-party representatives, and business partners.

# Our commitment to combatting modern slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to:

- Acting ethically and with integrity in all our business dealings and relationships
- Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- Improving our practices to combat slavery and human trafficking.
- Ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.



# Policies, processes and procedures

The following policies, processes and procedures are available to all employees via our employee handbook:

- Code of conduct
- Safeguarding procedure
- Personal harassment policy
- Whistleblowing procedures
- Recruitment and selection procedures

Through these policies, procedures and the measures below we can increase awareness of human rights risks and how they can be identified and addressed.

- We procure in accordance with the principles of fairness and transparency.
- Employees are aware of how to report incidents of concern and are encouraged to do so. They can do this through their managers or through the whistleblowing procedure.
- Employees are recruited lawfully following clearly communicated procedures and right to work checks are
  carried out to ensure that individuals have the right to work in the UK. Only reputable recruitment agencies
  are used for temporary staff and are subject to our procurement process prior to engagement.

### **Training**

We have various training modules available to all employees via our eLearning platform including compliance-based modules. Employees are also required to read key policies and procedures as part of our documented induction process.

# Our effectiveness in combating slavery and human trafficking

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

## **Further steps**

Following a review of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take further steps to combat slavery and human trafficking within the next financial year.

Treleigh Holdings will:

- Share this statement with employees and signpost to other resources such as the Modern Slavery Helpline
  and the "Stronger Together" initiative, to raise awareness of the Modern Slavery Act and what action to take
  if they have concerns.
- Add both the statement and training to our induction process for all employees.
- Include specific provisions in our standard purchasing templates for supplier contracts to require suppliers
  to manage and reduce the risk of forced labour and to ensure these are consistent with the Modern Slavery
  Act.



This policy statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

This statement is reviewed annually and approved by Group Managing Director who has responsibility for ensuring its implementation.

Signed Jellal 16 (05/23

(Name and Role within Company)...James Gazzard Group Managing Director.....

Reviewed 24<sup>th</sup> January 2023

Next review date: 24th January 2024