



## **ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Purpose**

The Modern Slavery Act 2015 (MSA 2015) focuses specifically on the issue of modern slavery to ensure offenders are suitably reprimanded with severe sentences. Modern slavery covers four activities:

**Slavery** – Exercising powers of ownership over a person

**Servitude** – The obligation to provide services is imposed by the use of coercion

**Forced or Compulsory Labour** – Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily

**Human Trafficking** – Arranging or facilitating the travel of another person with a view to their exploitation

The MSA 2015 requires large businesses, with an annual turnover of over £36 million, to be transparent about their efforts to eradicate Slavery and Human Trafficking.

Lloyd Ltd is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers.

### **Company Structure**

Lloyd Ltd operates from the UK only and specialises in Agricultural, Construction, Groundcare and Lawncare, Materials Handling, 4x4 and Equestrian Equipment, representing over 30 manufacturers. The Company has 8 branches and a Used Car Centre. The Company employs 250 people and the main activities include the following:-

- a) Selling of new and used machinery
- b) Carry out servicing and repairs of machinery
- c) Selling of parts and accessories
- d) Selling of finance and insurance products under FCA guidelines

### **Policies**

As part of our commitment to combating modern slavery, we have implemented the following internal policies, which are available for all staff to view on our Company Intranet:-

**Anti-Slavery and Human Trafficking Policy** – This policy sets out our stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

**Recruitment Policy** – We operate a robust recruitment policy, including 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.

**Whistleblowing Policy** – We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are treated or practices within our business or supply chain without fear of reprisals.

We also make sure our suppliers are aware of our policies, and adhere to the same standards.

These policies have been developed by the Human Resources Department and are reviewed annually.

### **Training**

We ensure that all our employees have access to our policies and procedures contained in our Employee Handbook, which is accessible on SSL Post. As part of our Business Induction we train employees on recognising the risks of modern slavery and human trafficking in our business and supply chains. Employees are encouraged to identify and report any potential breaches of the Anti-Slavery and Human Trafficking Policy.

### **Due Diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, we use our reasonable endeavours to conduct risk assessments of third parties we work with and investigate, where feasible, the working conditions of their workers.

Our main suppliers are the manufacturers themselves who supply machinery / equipment and parts to us. The production of the machinery / equipment and parts are mainly done overseas and our UK manufacturing partners have robust procedures in place to ensure modern slavery laws are adhered to.

We will also have contracts and agreements in place with other suppliers, which are controlled and risk assessed by our Group Purchasing Manager. Terms of Business are agreed with the suppliers and the management team are informed of this and cannot use other suppliers without prior approval from the Group Purchasing Manager.

The HR Department control the use of Recruitment Agencies, and there is limited requirements for the use of Agency workers within the organisation.

Our procedures are designed to:

- a) Establish and assess areas of potential risk in our business and supply chains
- b) Monitor potential risk areas in our business and supply chains
- c) Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- d) Provide adequate protection for whistleblowers

### **Risk and Compliance**

We regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring in the supply chain.

We do not consider that we operate in a high risk sector or locations as we seek to identify and do business with reputable companies that are known to us, or that have the same high values as us.

Should we identify a potential risk we would investigate fully and review our procurement practices to ensure that improvements are in place.

We ensure all our suppliers adhere to our Anti-Slavery and Human Trafficking policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. If a supplier was found to be in breach of the law, we will immediately seek to terminate our relationship with the relevant supplier.

**Effectiveness**

We have not identified any indications that modern slavery occurs in our supply chain, therefore, we have not adopted any Key Performance Indicators (KPI's). However, our control of supplier list and our ongoing relationship with our suppliers should indicate to us if any of them are not implementing appropriate measures. We ensure that the suppliers can provide confirmation to us of their compliance to modern slavery laws.

**Approval**

This statement is made in accordance with section 54 (1) of the Modern Slavery Act 2015 and constitutes Lloyd Ltd's Anti-Slavery and Human Trafficking Statement for the financial year commencing January 2019 and ending December 2019.

This statement was approved by the Board of Directors on .....27/2/19.....

Signature: 

Barry Lloyd, Managing Director  
Lloyd Ltd

Date: 28<sup>th</sup> February 2019