

# **Partridge of Hampshire Limited**

## **Modern Slavery and Human Trafficking Statement for 2020**

### **Introduction**

This statement is reviewed each year and sets out the steps Partridge of Hampshire Ltd has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any part of its own business.

This statement relates to actions and activities during the financial year ending 31<sup>st</sup> December 2020.

As part of the Automotive Industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are committed to protecting our organisation and those people at risk from exposure to slavery or human trafficking in our supply chain, both via our direct employees and those working on our behalf via third party suppliers.

The Company 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.

### **Partridge of Hampshire Ltd Business Structure**

This statement covers the activities of Partridge of Hampshire Ltd, which is a privately owned business, a franchise of BMW UK Ltd, retailing over 5,000 units being made up of new and used BMW, BMWi and MINI, offering Aftersales and Bodyshop services, employing a workforce of 142 staff as at 31 December 2020, operating from:-

BMW and MINI Retailer Sales and Service:

1 Stoneycroft Rise, Chestnut Avenue, Chandler's Ford, Eastleigh, Hampshire, SO53 3YU

BMW and MINI Vehicle Repair / Bodyshop Centre:

Unit 1, Barr End Estate, Winchester, Hampshire SO23 9NP

BMW and MINI Preparation Centre

Wrens Farm, Castle Lane, North Baddesley, Hampshire SO52 9LY

### **Supply Chains**

The Motor Trade supply chain is one of the most complicated in any industry. The breadth, depth and interconnectedness of the automotive supply chain make it challenging to effectively manage and mitigate the risk of modern slavery. We also recognise that the nature of the motor industry is such that our supply chain for new and used vehicles is multifaceted, as any given vehicle will have its own supply chain for the various component parts. We therefore understand, that ultimately our vehicle supply chain begins with the sourcing and manufacturing of the raw materials required for any part of a vehicle. As our relationship is with the vehicle manufacturer and subsidiaries within BMW Group UK and not with their supply chain, we are keen to engage with our suppliers to ensure that they match our high standards and the ethos of the Modern Slavery Act 2015 and filter this message down throughout their own supply chain.

Our associated business suppliers are our manufacturer and subsidiary companies within BMW Group UK, and other suppliers. Some of these suppliers work within the business on a day to day basis:

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Compliance Consulting  
IT Consultancy  
Marketing Agencies  
Recruitment Agencies  
Training Consultants

Building and Facilities Contractors  
Print and Copier Suppliers  
Office Stationery Suppliers  
Coffee Suppliers  
Tyre Supplier

A review of our supply chain identified that 476 suppliers were used during 2019, with a combined spend of around £104,239,546. Of the supply chain 100% were located in either the UK or EU and are considered low risk. The largest 5 suppliers accounted for 96% of the total spend - BMW Vehicles / BMW Parts / BMW FS / Barclaycard / AFRL.

Partridge of Hampshire Ltd is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and expect the same high standards from all our contractors, suppliers and other business partners. We establish a relationship of trust and integrity with all our suppliers, which is built on mutually beneficial factors.

### Policies on Modern Slavery

The Company operates the following policies, which 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 and Human Trafficking Policy**
- **Whistleblowing Policy** the Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's Whistleblowing Policy 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 Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company 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 Company 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 Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency Workers Policy** the Company 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.

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### **Due Diligence and Risk Assessment**

The Company undertakes due diligence when considering taking on new suppliers and assesses whether or not particular activities are high risk in relation to slavery or human trafficking, with regular review of its existing suppliers. The Company's due diligence and Risk Assessment reviews include:-

- Evaluating the modern slavery and human trafficking risks of each new supplier as per the Supplier / Procurement Code of Conduct and the Recruitment / Agency Workers Policy, additionally requiring sight of their own policies concerning the issue
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans, ie checking staff are on a pay roll, auto pension enrolment and checking pay slips
- 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
- Continue to provide e-learning training for management to enable them to identify, assess, mitigate and report specifically on modern slavery
- Continue to publish our Modern Slavery Policy and Whistleblowing Policy within our Employee Handbook
- Creating an annual risk profile for each supplier
- Continue to assess and identify high risk groups in supply chain. Carry out appropriate due diligence, assessing through actively engaging with face to face meetings, where practicable, and / or questionnaire

### **Measuring Effectiveness**

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

- Requiring all managers to have completed training on modern slavery
- Developing a system for supply chain verification, whereby the Company evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains, whereby the Company evaluates all existing suppliers.

### **Recruitment and Training**

Partridge of Hampshire Ltd operates a robust recruitment process in accordance with UK legislation, including interviews for all roles, Passport, ID and address checks, also ensuring everyone employed is over the age of 16, has control and possession of their own passport and is eligible to work in the UK.

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Partridge of Hampshire Ltd's Modern Slavery and Human Trafficking Statement and Whistleblowing Policy, form part of the Company Induction Programme, which the Company requires all staff to complete.

Partridge of Hampshire Ltd's Modern Slavery and Human Trafficking Statement and Whistleblowing Policy appear in the Employee Handbook, a copy of which is given to each new employee and which is also freely available.

Partridge of Hampshire Ltd, requires managers within the Company to complete online training on modern slavery. The Company'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 Company;
- what external help is available, for example through the Modern Slavery Helpline, 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 Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.

### Awareness-raising programme

As well as training staff, the Company has raised awareness of modern slavery issues by putting up posters across the Company's premises and circulating a series of emails to staff.

The posters and 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 Company; and
- what external help is available, for example through the Modern Slavery Helpline

Whilst ultimately the majority of risks within the business rest with our manufacturers and suppliers, we are not complacent and will continue as a Company to seek to identify and manage any potential risks associated with modern slavery. We have endeavoured to put safeguards in place to ensure, so far as is reasonably practicable, that the working practices of those employed directly by us and those

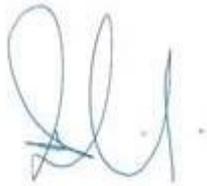
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with whom we have a direct contractual arrangement also have a similar zero tolerance to modern slavery.

In the next 12 months we will continue to evolve and strengthen our approach to managing the risk of modern slavery within our business and ensure our strategy is responsive to changing risks.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Partridge of Hampshire Ltd.'s Modern Slavery statement for the financial year ending 31 December 2020.

A handwritten signature in blue ink, appearing to read 'T. Partridge', is positioned above the typed name.

Signed by:  
Toby Partridge  
Managing Director  
Partridge of Hampshire Ltd

Dated : 22<sup>nd</sup> February 2021