

MODERN SLAVERY STATEMENT 2022/ 2023

THOMAS HARDIE COMMERCIALS LTD

INTRODUCTION

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Thomas Hardie Commercials Ltd is taking to reduce the risk of slavery or human trafficking taking place in its supply chains or in any part of its business.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour.

Thomas Hardie Commercials Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and putting effective systems and controls in place to safeguard against any form of slavery taking place within the business or our supply chain.

OUR BUSINESS & STRUCTURE

Thomas Hardie Commercials Ltd whose headquarters is in Liverpool and who currently employs around 350 employees is a commercial vehicle franchise and is the main Volvo Truck and Bus dealer in the Northwest of England and North Wales.

Through 6 dealer points based in Liverpool, Preston, Trafford, Deeside, Lancaster and Middlesbrough it sells and supplies genuine Volvo parts and repairs to Volvo Commercials vehicles. Additionally, it also provides servicing, repair, painting, body building services, contract maintenance, contract hire and none Volvo parts for all makes and models of commercial vehicles/trucks in the Northwest of England and North Wales.

Based at a number of customers premises in the North West of England, North Wales and one location in Scotland it is also responsible for repairing and maintaining those customers fleets based at that site.

It also sells used vehicles which are sourced from Volvo Trucks UK and/or purchased as trade or part exchange within the UK.

In total the company currently operates across 11 locations.

SUPPLY CHAIN

The company's primary supplier is Volvo Group who supplies the company with commercial vehicles and parts under whose franchise agreements we operate.

OUR POLICIES ON SLAVERY & HUMAN TRAFFICKING

Thomas Hardie recognises that people are at the core of what we do and are key to our success. As such one of the overarching aims of our business is to be "the best employer to the best employees". This coupled also with the fact that human rights are fundamental to Volvo Group and their Code of Conduct.

As a Volvo main dealer, this is also at the core of what we do and how we manage our human capital responsibility. This includes respecting human rights and preventing modern slavery and human trafficking occurring within any part of our business or supply chain.

The Volvo code sets out, amongst other things, their principles on human rights and social justice. Zero tolerance to forced labour and child labour has been part of the code since 2003. Forced labour, including debt bondage, human trafficking and other forms of modern slavery is not accepted in any of the Volvo businesses.

OUR ACTIVITIES IN COMBATting SLAVERY & HUMAN TRAFFICKING

During the course of the 2022/23 we have:

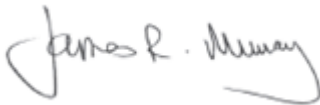
- Carried out a continuous risk analysis to identify the highest potential risks of forced labour and human trafficking in our operations and supplier chain.
- Carried out a risk analysis to identify the highest potential risk suppliers and sub-contractors.
- Carried out an audit programme of our suppliers and identified those that are within the scope as well as smaller suppliers who fall outside to determine risk levels and compliance.
- Reviewed and made changes to our current supplier pre-contract processes and procedures to ensure continued mitigation of the risk of slavery and human trafficking occurring in our supply chain in particular around fitment of new Vehicle parts within our PDI process.
- Initiated an internal due diligence process review to help identify, assess and mitigate and remedy potential human rights violations.
- To demonstrate our commitment to acting ethically and with integrity in all our business relationships we have implemented this anti-slavery policy, which is available through our web site and intranet site to ensure it is communicated to all staff.

TRAINING

Thomas Hardie remains dedicated to strengthening its practices in this area and it will continue to develop further measures, including the training of staff where appropriate, to further reduce the risk of slavery and human trafficking taking place within its own business and across its supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Thomas Hardie Commercials slavery and human trafficking statement for the year ending 31 December 2022.

Signed:



Jim Murray
Managing Director

Thomas Hardie Commercials Ltd

Date: January 2023