

# Modern Slavery Statement

*Our Purpose: To transform the way the world buys, sells, owns and uses vehicles*

Cox Enterprises is a family run operation. Nearly 120 years ago, James M Cox purchased the Dayton Daily News, beginning a legacy that continues today. With the fourth generations of Governor Cox's family at the helm, Cox Enterprises has become one of the leading communications, media and automotive services companies.

Cox Automotive is the world's largest automotive service organisation, providing a complete set of products and services that are all in one place and easy-to-use for our clients. With solutions that help dealers, manufacturers, fleet companies and leasing firms add value and improve business performance, we are committed to our vision to transform the way the world buys, sells, owns and uses vehicles.

We empower people today to build a better future for the next generation. These simple, powerful words capture the spirit of Cox today and is why we treat our employees with dignity and respect. We aim to harness our potential to be a force for good in the world. We know that great people can achieve amazing things when we work together, and for us how we do things is as important as what we do.

Our guiding principles are to do the right thing always: to lead by example: to bring out the best in everyone: to have fun and make today count. And to do it all in the spirit of Cox.

## Statement on Preventing Human Labour Exploitation (Modern Slavery)

Modern slavery is a crime which results in the abhorrent abuse of the human rights of vulnerable workers. Cox Automotive has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all its business dealings and relationships. We will implement effective systems and controls to ensure that modern slavery and human trafficking are not taking place either within our own business or in any part of our supply chain, in compliance with the Modern Slavery Act 2015.

The company expects the same high standards from its suppliers, contractors and other business partners, and as part of its contracting processes includes specific prohibitions against the use of modern slavery: in turn we expect our suppliers to hold their own supply chains to these high standards.

## Structure

Cox Automotive operates within the UK and has working sites across England, Scotland comprising a number of companies and brand names, and a small number of team members working in Ireland. Our Head Office address is Central House, Leeds Road, Rothwell, Leeds LS26 0JE.

Cox Automotive Head Office is responsible for the governance arrangements for all UK sites and is the location for the Human Resources and Supply Chain functions for Cox Automotive. It also has a mature Business Assurance function responsible for Compliance and Internal Audit.

Cox Automotive has published its Corporate Responsibility Statement on its main website [www.coxauto.co.uk](http://www.coxauto.co.uk) which includes our position on Modern Slavery: in addition this separate Modern Slavery Statement will be produced from 2019 onwards on an annual basis to set out the specific actions taken by our company. The following entities are required to publicly report:

Manheim Limited

Money4yourmotors.com Limited and We Want Any Car Limited

### **Suppliers - Ethical Purchasing**

Our Supply Chain is largely UK based with a very small number of services purchased from overseas companies. Cox Automotive has implemented a purchasing policy to ensure that business standards are integrated through our supply chain. We are committed to obtaining and retaining competitive goods and services whilst also ensuring they are from sources which have not jeopardised human rights, safety or the environment. We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect and shared ethical values.

We expect our suppliers to adhere to business principles consistent with our own: to ensure that their products and services are produced and delivered to comply with all legislation relevant to their business: and to ensure they adopt and implement acceptable safety, environmental, product quality, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

We will seek to work with our key suppliers to develop long-term meaningful relations and to improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

### **Cox Automotive Policies on Modern Slavery**

Cox Automotive Human Resources department has documented policies and guidance covering all aspects of UK legislation which cover employees and their employment with us and provide clear standards for legal compliance.

Cox Automotive Supply Chain has documented its Ethical Purchasing Policy which sets out standards and code of conduct for all suppliers. It is their policy to ensure that thorough due diligence is undertaken across the supply chain to ensure compliance to all UK legislation.

### **Cox Automotive Policy on Recruitment, Employment and Human Rights**

Cox Automotive will always recruit the best person for job and will not discriminate on the basis of protected characteristics\* such as age, disability, gender, gender reassignment, marital or civil partnership, pregnancy and maternity, race, colour, nationality, ethnic origin, religion or belief, and sexual orientation. Cox Automotive has implemented an Equal Opportunities and Diversity policy, and requires its employees to undertake training to understand its core principles, which are to create and sustain a positive working environment where everyone is equally valued and treated fairly with respect and dignity at all times.

\*As set out in the Equality Act

Cox Automotive will adhere to the following principles in respect of our employees.

- We will treat all employees fairly and honestly. All employees will have agreed terms and conditions in accordance with legislation and will be given appropriate skills training.
- We will pay a fair wage reflecting market conditions and will always meet any national minimum wage.
- Working hours shall not be excessive and shall comply with industry guidelines and national standards where they exist.
- We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour and have a zero tolerance to modern slavery.
- Team members have the rights of freedom of association and collective bargaining. We respect the right of our team members to choose whether or not to join a trade union without influence from management.
- We will negotiate in good faith with the properly elected representatives of our employees.
- We will abide by the non-discrimination laws where we operate our business.
- We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- We have formal grievance procedures through which staff can raise personal and work-related issues.

## Due Diligence Processes

### Employees:

Cox Automotive recruitment process includes robust controls to validate the ID of any prospective employee and ensure that they have full Right to Work documentation. Recruitment agencies, where used, are from our Preferred Supplier list and subject to full due diligence by the Supply Chain team.

### Suppliers:

During 2018, Cox Automotive further enhanced its supplier due diligence programme with the design and implementation of a software-based Pre-Qualification Questionnaire (PQQ). This comprehensive document collects statements against all aspects of compliance, including quality, safety and legal compliance. It is a requirement for a satisfactory PQQ to be completed by a new supplier before any goods or services may be provided.

Cox Automotive has also committed to retrospectively undertake the PQQ assessment with its existing supply chain. This project was launched at our Supplier Engagement Day in late 2018 and will run through 2019 under a dedicated project manager. All responses will be assessed, and actions taken in the event of missing or unsatisfactory responses.

### Third party referrals:

The Cox Automotive business **Movex** offers transport services to our customers via a web platform. Those transport providers are not under contract to Cox Automotive, however to ensure our customers can have confidence in their logistics partners Movex have implemented during 2018 a Supplier Compliance questionnaire to cover Employee and Modern Slavery legislative compliance. It is a requirement that any provider must complete this assessment to be included as a registered provider on their website.

## Risk Assessment and Mitigation

Regular review is undertaken by the Cox Automotive Supply Chain team and the following areas of potential risk were identified:

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| Suppliers who are based overseas, particularly where those businesses may be in countries with less robust human rights legislation than in the UK | Full PQQ due diligence: retrospective checking on existing suppliers.   |
| Agency or contractor workers who may be vulnerable to abuse by their employer  | Focus on partnership arrangements with good reputation and who are bound contractually to adhere to Cox standards, complete the full PQQ and are be subjected to random Cox Automotive audits |
| General suppliers who may subcontract their services or purchase from overseas suppliers without ensuring adequate due diligence                   | Full PQQ due diligence either new or retrospective suppliers – clear contractual obligations to declare subcontracting and to bind such subcontractors to all UK legislation                  |

## Measuring Effectiveness

The implementation of a software based PQQ will enable Cox Automotive to have dashboard reporting in terms of supplier due diligence. The plan is to develop appropriate KPI's during 2019 with the support and oversight of the Cox Automotive Business Assurance Team.

Business Assurance delivers an annual Internal Audit programme which includes monitoring for compliance to UK legislation and reporting to Board any deviation from policy or non-compliance.

## Training, Awareness and Reporting

Regular dialogue takes place between the Business Assurance Team and the Human Resources and Supply Chain teams regarding the on-going internal plans to mitigate the risks associated with Modern Slavery. Cox Automotive have committed for 2019 to either source or create bespoke training materials to be delivered companywide to every employee through our Learning Management System. This will provide awareness for employees of the legislation and our obligations.

Webinars will also be delivered during 2019 to all members of the H R team specific to their role.

Monitoring of training completions will be undertaken by Business Assurance.

## Whistleblowing

Cox Automotive has a well-established and effective Whistleblowing Policy and procedure for reporting. The business maintains a confidential email box and telephone line which is publicised both through routine training and by workplace posters.

## Commitment

It is our sincere commitment to deliver on our planned actions and to strive for continuous improvement during 2019 and beyond.

Signature..........Martin Forbes, Chief Executive Officer