

Modern Slavery and Human Trafficking Statement – 2021 2022

TBC Conversions takes its social responsibilities very seriously and conducts its business in accordance with its core values of integrity, trust, respect and commitment.

TBC Conversions is committed to acting ethically in all our business dealings and relationships.

TBC Conversions has a zero tolerance approach to acts of modern slavery and human trafficking within both its business and supply chain and requires the same standards from its suppliers.

Business practices and responsibilities can continually be improved and TBC Conversions is committed to understanding more about modern slavery and human trafficking.

Group Organisational Structure

TBC Conversions is part of the Donnelly Group with Donnelly Bros. Garages (Dungannon) Limited being the parent company. The full list of group companies can be found at Appendix 1.

TBC Conversions head office is in Dungannon, Co Tyrone with trading companies located across Northern Ireland and the UK.

TBC Conversions principal activities are the sale of converted new passenger cars and commercial vehicles from over 18 global manufacturers as well as the following functions;

- Retail of used vehicles
- Arranging finance & leasing of vehicles
- Providing vehicle aftercare including servicing and repair
- Retailing of parts and accessories
- Vehicle conversions to special purpose vehicles

Our supply chains

The supply chain in the automotive industry is one of the most complex business sector supply chains, there could be up to ten levels of suppliers between a car dealership and the source of raw materials that make up all the various parts of the vehicle. The breadth, depth and interconnectedness of the supply chain can make it challenging to manage business and sustainability issues.

The group procures a wide range of vehicles, parts for vehicles and other accessories as well as other goods and services from a wide variety of suppliers.

Our supply chains currently support the following activities:

- Vehicle Manufacturing
- Vehicle retail
- Vehicle Leasing
- Product manufacturing & import
- Retail services
- Recruitment and training
- Advertising & marketing
- IT Services
- Operations & infrastructure support
- Business process outsourcing
- Accident Management

We have adopted a risk based approach to the assessment of our business and supply chain, which has involved taking industry and market factors into consideration in order to identify categories of supply that may present a higher risk of modern slavery being present.

Due Diligence - Supply Chain standards and Actions to Address Risk

TBC Conversions prohibits all areas of its business and supply chains from engaging in slavery and human trafficking. The main protection against slavery is to ensure that all business activity complies with minimum wage and national living wage legislation; this is a fundamental requirement for all of our contractors.

TBC Conversions also requires that all contractors only employ staff with a right to work in the UK. Suppliers/Contractors are required to declare on the 'Contractor Safety, Health, Environmental & Quality (SHEQ) Questionnaire whether they have a Modern Day Slavery policy.

TBC Conversions are progressing an approved supplier listing to ensure that only suppliers on this list can be used to supply goods and services throughout the group.

Respecting human rights and environmental issues in the supply chain is ultimately the responsibility of our suppliers. As customers in that supply chain we will also play an active role in supplier development and we will adopt various means to clearly communicate our expectations to our suppliers. We reserve the right to terminate any relationships with suppliers if there are any issues of noncompliance with our policies. Due diligence checks will be preformed.

We also intend undertaking the following actions;

1. Introducing contractual obligations that reflect Modern Day Slavery legislation and Ethical Trade Base Code in our employee manual by inserting a Code of Conduct surrounding the following;
 - a. Prohibition of child labour
 - b. Prohibition of forced labour & human trafficking
 - c. Prohibition of physical disciplinary abuse
 - d. Prohibition of any infraction of the law
 - e. Non discrimination
 - f. Basic working conditions
 - g. Working hours
 - h. Environment
 - i. Freedom of association and
 - j. Health & Safety
2. TBC Conversions policy on the above will ensure that it clearly states that we will not tolerate forced labour (including human trafficking) or child labour in our operations and we will conduct regular checks to ensure compliance.
3. TBC Conversions have historically favoured suppliers that operate with ethical codes of conduct that include regular compliance audits and we only work with companies that contractually commit to complying with applicable laws and regulations.
4. TBC Conversions have appointed a whistle blowing champion who will be the designated person who all employees can report any concerns to.
5. Reviewing and assessing existing suppliers and in particular their sourcing policies in key risk areas.
6. All Managers will be given training on Equality and Dignity at work and the general staff will have awareness training at on boarding.

7. Assessing whether a formal supplier code of conduct and supplier terms and conditions similar to those for our sales process would be effective tools for areas of the business where a modern slavery risk is identified.
8. TBC Conversions clearly communicates to employees the values, actions and behaviours expected of them when representing the company. TBC Conversions strives to maintain the highest standards of employee conduct and ethical behaviour when operating both on-site and off-site and while managing its supply chain.
9. Recruitment and selection policy- TBC Conversions is registered as an Equal Opportunities employer and applies a fair recruitment process.
10. The aforementioned policy and code of conduct will be owned and administered by the Human Resources Manager at Donnelly Group.

Our approach

Primary responsibility for identifying risks and implementing process around prevention of modern slavery in our supply chain will lie with all Managers in TBC Conversions who have a procurement responsibility.

We will train our Managers who have direct responsibility in recruitment with our policies on anti slavery and human trafficking and to act at all times in a manner compliant with these. We include Modern Day Slavery awareness at Company on boarding.

Further steps and training

Constant review of group processes for identifying, assessing, mitigating and reporting specifically on modern slavery risks in the business, as well as continuous development and staff training on the modern slavery policy throughout the group.

Approval

This statement is made in line with Section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the year 2021 2022. It will be reviewed and updated annually.

The Board of directors delegated approval of this statement on its behalf to the Managing Director of TBC Conversions, David Donnell on 3rd September 2021.



On behalf of the Board of Directors of Donnelly Group