



## **Slavery and Human Trafficking Statement 2018-19**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for each organisation within our Group for the financial year ended 31<sup>st</sup> December 2019.

### **Organisational Structure**

C.E.M. Day Limited and its subsidiaries Car Hire (Day of Swansea) Ltd, Day's Property Holdings Ltd, Three Cliffs Investments Ltd, Simply Vans Ltd. and Contract Hire of vehicles. The Group was established in 1926. Currently, there are 15 designations and they operate in Wales and England employing of 604 staff.

The Group's annual turnover exceeds £231m.

### **Group Supply Chains**

The Group works with a wide range of suppliers, some of whom are able to subcontract work to other suppliers. Some of our suppliers also utilise recruitment agencies to supply temporary or permanent staff. We work closely with our suppliers to ensure they meet our minimum standards and comply with all local and national laws and regulations. The Group's policies relating to slavery and human trafficking. Our vision is "We believe in life without barriers" and operating our business to the highest moral and ethical standards helps support this vision. As such, we support the principles of the Modern Slavery Act and recognise that the Group has a responsibility to do its utmost to tackle modern slavery and human trafficking.

The Group has put in place a specific policy in relation to whistleblowing which, whilst not focussing specifically on modern slavery, sets out the process by which concerned employees and Board Members can report any concerns of wrongdoing involving the Group. We also have Codes of Conduct and an employment Equality, Diversity and Inclusion Policy that sets out the Group's commitment to developing, maintaining and supporting a culture of equality and diversity in employment in which employees are treated equitably, and can realise their potential. During the forthcoming year, we intend to review these policies to include specific references to the Modern Slavery Act.



### **Due diligence processes for slavery and Human Trafficking**

As part of our tendering and procurement process, we require potential new suppliers to complete an equality and diversity self-assessment to confirm their compliance with relevant national and international legislation. We require all suppliers to match our commitment to equality and diversity in employment practices and service provision and this includes modern slavery and human trafficking. We ask successful tenderers contracting with the Group to ensure that they adhere to their obligations in respect of, amongst other things, equitable treatment of employees. Should suppliers not meet our standards, or refuse to work towards meeting our standards, then we may refuse to do business with them. Whilst we believe our due diligence procedures are effective in ensuring we do not contract with suppliers engaged directly in modern slavery and human trafficking.

### **Areas of operation at risk of slavery and Human Trafficking**

The Group is based within Wales and England so the business activity takes place across the United Kingdom. As such, we have identified that the risk of modern slavery or human trafficking impacting our business or supply chain is comparatively low. Despite this, we have highlighted that there are some areas of our operations that are more vulnerable to modern slavery than others, particularly in relation to suppliers and sub-contractors for maintenance and repairs, on and off-site. To address this specific risk, we plan to include a clause in our standard terms and conditions requiring suppliers and contractors to acknowledge our commitment to combat modern slavery and human trafficking and to meet our ethical standards in this area.

### **Monitoring of Group operations and our supply chain**

During 2018-19, we did not identify any instances of modern slavery within our Group or within our supply chain. However, we continue to remain vigilant to the risk and have processes and procedures in place, including our Whistleblowing Policy that allows us to continue to monitor our operations. With regards the wellbeing of our staff, they are informed to identify signs that may show indications of distress which in turn could turn into 'modern slavery'.



### **Future plans**

We are planning to undertake a number of activities over the next 12 months to improve our processes and procedures in respect of the Modern Slavery Act. These activities include:

- Reviewing our Procurement Processes and Procedures, so that they include references to modern slavery and human trafficking;
- Revisiting our Whistleblowing Policy and Codes of Conduct to ensure they remain fit for purpose in light of the Act's requirements;
- Improving the awareness of our employees, customers and suppliers regarding the Modern Slavery Act 2015, including what constitutes modern slavery and human trafficking;
- Updating all employee and contractor training relating to safeguarding, to include reference to modern slavery; and
- Monitoring our suppliers and supply chains to ensure they are, and remain, free from slavery and human trafficking.

*This statement has been approved by Mr Mike Grant on 12<sup>th</sup> December 2019*

A handwritten signature in black ink, appearing to read "M. J. Grant", is written over a horizontal line. The signature is enclosed in a hand-drawn oval.

Mr Mike Grant  
Director of Group Operations