

# **Slavery and Human Trafficking Statement For E-ppl Holdings Ltd and its subsidiaries for the Financial Year ended 31<sup>st</sup> March 2019**

*E-ppl Holdings Ltd Modern Slavery Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 "Transparency in Supply Chains". This statement sets out the steps that E-ppl Holdings Ltd have taken to address the risk of slavery taking place within its own operations and supply chains and how we plan to continually improve our approach.*

## **Business Sector**

Our group of companies which includes E-ppl, Autoscan and Simmeron Associates support OEM's and their supply chains predominantly in the Automotive sector with their vehicle projects and quality performance through a varied number of managed services.

An intrinsic part of the service we provide to our customers is our people and we strive to operate with the highest standards of ethics and responsibility towards our employees and workers and do all that we can to ensure that our supply base operate in the same way.

## **Organisational Structure**

Due to the nature of our customers requirements and the vehicles that they manufacture our support to them is highly reactive which means our manning at any one time can change dramatically flexing from between 350 to 1200 personnel at any one time. We support in many areas throughout the UK at our customers premises and the business code of conduct that we instill in all of our employees is adopted throughout. We require all colleagues to act with integrity and be vigilant against human rights abuses and actively encourage the importance of raising any concerns to management.

We have a cross-functional working group under the sponsorship of the Group CEO which includes participation from Operations, Commercial, Recruitment and Human Resources to help in tackling modern day slavery and human trafficking within our business and our supply base.

This Group meets on a regular basis to discuss and take action in the following areas;

- Identifying areas of risk within our business and the supply chain
- Taking appropriate steps to mitigate those risks
- Developing an ongoing programme to continually improve our response to slavery and human trafficking risk
- Monitoring the ongoing effectiveness of our risk prevention
- The protection and encouragement of whistleblowers

Whilst we recognize that no business is immune to the risks of modern slavery, we believe that by having a standardized and robust set of policies and procedures throughout the Group we can help to minimize the risk to our workforce.

## **Policies**

### **Recruitment Policy**

The purpose of this policy is to provide a sound framework for the recruitment and selection of staff based upon the principles outlined below whilst also meeting the requirements of Equal Opportunities, the Equality Act 2010 and all other employment regulation and our policy ensures we will;

- Be fair and consistent
- Be non-discriminatory
- Conform to all regulations and agreed best practice

E-ppl Group companies undertake “right to work” checks and DBS checks with all employees prior to commencement of roles with the company ensuring where necessary valid work visas are in place and appropriate age to work is strictly adhered to.

### **Whistle Blower Policy**

If E-ppl Group personnel identify any potential signs of slavery, human trafficking or other human rights abuses they are encouraged to report all instances to management as we will not tolerate harassment, victimization or discrimination in any form and operate access to remedy for all victims.

To date we have received no reports of concerns regarding slavery or human trafficking in our operations. In the event that such issues were reported to us, we would undertake an immediate and thorough investigation into the concerns raised under the supervision of members of the E-ppl Board of Management. If the investigation confirmed the concerns, we would put in place robust action plans to address the issue and protect the victims.

### **AIP Policy**

As a group of companies we recognise the benefits of staff health and wellbeing whilst at the same time having a robust, clearly understood procedure for managing sickness absence that ensures staff are treated fairly and compassionately when they are absent due to illness and helps staff to return when they are fit to do so. This gives employees the opportunity to speak openly about any underlying reasons that are contributing to their wellbeing in a confidential environment enabling any help and support to be identified and provided.

### **Training**

E-ppl Managers and Team Leaders are trained to monitor record and report where workers appearance may show signs of injury or malnourishment. They talk informally to workers to discuss if they are experiencing any issues.

We believe that training and education are fundamental tools in the fight against modern slavery and we deliver specific training to ensure our staff are able to spot the signs of modern slavery and help to provide a safe environment for our staff.

As a business we monitor which bank accounts our employees request their salaries / wages are paid into and that there is no duplication of accounts or that workers pay is not paid into someone else's account. Pay slips can be made available to individuals by post, email, or secure online portals.

### **Continually Evolving Our Approach to Combatting Modern Day Slavery**

Our policies and ethos are clear on the need to protect human rights in a transparent non-discriminatory manner driven from Board level down. However, we recognize that these measures only allow for a limited degree of comfort that slavery is not occurring within our business and that of our supply chain. We continue to develop policies and take action to determine how we can further combat this growing modern-day problem.

As part of future development, we plan to generate and issue a supplier questionnaire that is completed annually alongside physical on-site audits to over and above 75% of our supplier partners as an initial starting point. From the results of these two activities and the resulting analysis of that data and appropriate actions taken we can further mitigate the risk to individuals within our supply chain.

A handwritten signature in black ink, appearing to read 'Paul Simmerson', with a long horizontal flourish extending to the right.

Paul Simmerson

E-ppl Group CEO