



Modern Slavery Act Statement.

Update: January 2019 – Version 1.2

Introduction

Highbridge Caravan Centre Limited is committed to constantly reviewing our employment practices, and the activities of our supply chain and ensuring compliance with the obligations under the Modern Slavery Act 2015.

This statement sets out the policies, practices and steps we undertake within our business to provide a framework aimed at ensuring our compliance to the requirements of the Act.

Principal activities of the business

Established in 1965 and operating two branches within the UK, we are a retailer of Motorhomes, Caravans and other camping products directly to the general public.

Responsibilities

The Senior Management team review its approach to human rights and modern slavery each year to ensure that no changes have taken place that may have impacted upon its initial risk assessment.

Once we have conducted our review, we annually publish our statement on our website within six months of the end of our financial year of 31st December.

Steps taken

The steps we have in place for our organisation aim to identify, address and prevent modern slavery occurring within our organisation and supply chains, and this includes the following:

Step 1: Carry out a Risk Assessment

During the year the Senior Management team led a review of the legislation and completed a risk assessment against our activities and concluded that in general the company does not have any area subject to high risk within the definition of the Act.

The company believes that its review and this statement are proportionate to the identified generally low risk to modern slavery as described within the Act.

The company's values are an integral part of the way the company operates and provides a framework that ensures that the behaviour of our employees meets or exceeds the minimum requirements set out in active employee legislation.

Step 2: Review our policies and Procedures

The company has relevant policies that will support its efforts to ensure compliance to the Act.

- Supplier agreements. The company has written to its supplier's, and communicates with any new suppliers our stance with regards to the slavery act. The company will only work with reputable suppliers to ensure they meet the standards required. Failure for any supplier to comply with these standards would result in a termination of trading activity respectively.
- Whistleblowing policy. The company encourages all its workers, customers and suppliers to report any concerns related to their direct activities, or our supply chain. This includes any circumstances that may give rise to a heightened risk of slavery or human trafficking.
- Employee Handbook. The company's Employee Handbook makes it clear to all employees the actions and behaviour expected of them when representing the organisation.

As part of its annual review, the policies listed above, and any other relevant policies will be reviewed and updated to ensure they include reference to and adequately ensure compliance with the requirements of the Act.

Step 3: Employee Awareness & Management Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have updated our induction programme to make new staff aware of the key aspects of this legislation.

All the company's management team are made aware of the obligations to the act, the due diligence process the senior management team have conducted and the actions required of all our managers to ensure that we comply with the requirements of the Act and that any suppliers who work with or for any manager is reviewed to ensure their compliance of the Act.

Due diligence

Given the low risk the company has assessed itself as, and the type of products that the company retails we believe that its existing commercial due diligence practices are sufficient to ensure continual compliance to the requirements of the Act.

However, this position will form part of its annual review process.

Measuring the effectiveness of our steps in combating slavery and human trafficking

We monitor replies from our suppliers to the communication we have sent to them explaining our stance on slavery and human trafficking, and to ensure that it has no place in any part of our business and supply.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the current financial year.

Signed



Lawrence Davies - Director

Highbridge Caravan Centre Limited.

Dated: January 2019