

Modern slavery and human trafficking statement

Introduction

This statement sets out the actions of Comline Auto Parts Ltd (Comline) to understand all potential modern slavery risks related to its business and outlines the steps in place that are aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2016 to 31 March 2017.

As part of the automotive aftermarket vehicle parts sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Comline Auto Parts Ltd, Allied Comline Ltd and Motaquip Ltd:

- All businesses deal in the automotive aftermarket car parts industry and we ship to businesses around the UK, Europe and sometimes further afield. Our parts are sourced or manufactured in other countries, particularly China and India. The only product we manufacture is brake pads in China and India, other parts are sourced from suppliers in these countries.

Countries of operation and supply

The organisation currently operates in the following countries:

- UK – Comline head office is in the UK and our major distribution centre. Parts are shipped into one of the UK sites and are picked and packed to send out to our customers, both in the UK and abroad, mainly in Europe.
- China – parts are sourced from Chinese suppliers and shipped to the UK
- India – parts are manufactured in India and we also have an office based in this region where selected business tasks are carried out. Examples include data processing, invoicing and graphic design.
- Spain – Comline operates a subsidiary, Comline Ibérica S.L., in Spain where we have a distribution centre and office functions. Here, goods are picked, packed and distributed to customers.
- Greece – Comline operates a subsidiary, Comline Hellas S.A., in Spain where we have a distribution centre and office functions. Here, goods are picked, packed and distributed to customers.

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Process of Assessment

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- The UK offices have a dedicated HR Adviser who ensures that all legal requirements are met with regards to employment of its staff.
- Both the Spanish and Greek subsidiaries are managed by competent business unit managers who ensure that all legal requirements for their respective regions are met.
- Comline's India office is managed by a competent business unit manager who ensures that all legal requirements are met. Our manufacturing facility is visited regularly by Comline Directors and Senior Managers. Their inspections ensure that there is no slavery or human trafficking activity.

Responsibility

Responsibility for the organisation's anti-slavery initiatives employ the following strategies:

- **Policies**
- **Risk assessments**
- **Investigations/due diligence:**
- **Training**

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and the steps taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy** – Comline encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.
- **Employee code of conduct** – Comline's code of conduct makes clear to employees the actions and behavior expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behavior when operating abroad and managing its supply chain.

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- **Supplier/Procurement code of conduct** - the organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their employee's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship
- **Recruitment/Agency workers policy** – Comline uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before enlisting its services and accepting employees from that agency.

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified
- creating an annual risk profile for each supplier
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring all staff supply chain managers/HR professionals to have completed training on modern slavery and developing a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain.
- Reviewing its existing supply chains through the evaluation of all existing suppliers.

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Training

Comline requires managers/HR professionals within the organisation to complete training on modern slavery as a module within the organisation's wider human rights/ethics/ethical trade training programme

The organisation requires managers/HR professionals to sign up to one of a number of training sessions

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent; purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages, wages below a country's national minimum wage or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organization.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Approval

- This statement has been approved by the organisation and will be reviewed and update annually.



Divyesh Kamdar
Managing Director – Comline Auto Parts Ltd
March 2017