



Mercedes-Benz

Sparshatt Truck & Van Ltd  
Mercedes-Benz Commercial Vehicle  
Dealer  
Unimog Service Dealer  
Industrial Engine Specialist

## Modern Slavery Statement – Annual Statement for 2022

### Introduction

This statement sets out Sparshatt Truck & Van Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the Transport Services sector, the organisation recognises 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 its supply chains are free from slavery and human trafficking.

### Organisational Structure and Supply Chains

This statement covers the activities of Sparshatt Truck & Van Ltd. Established in 1977, Sparshatt Truck & Van Ltd is a privately-owned organisation. The company's main activities are concentrated in transport and logistics: Mercedes-Benz and Fuso truck /van sales and commercial vehicle aftersales support, parts sales and vehicle finance.

### Countries of Operation and Supply

The organisation operates in the United Kingdom. We internally review our supply chain to evaluate human trafficking risks and slavery risks and we conduct supplier audits which review all aspects of the supply chain including safety, human trafficking, child labour and other legal requirements.

### Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

Policies: Group HR Manager/Management

Risk assessments: Health and Safety Coordinator

Sparshatt Truck & Van Ltd. Unit 2, Brookfield Industrial Estate, Leacon Road, Ashford, Kent. TN23 4TU  
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Registered Office: Unit 10 Eurolink Industrial Estate, Castle Road, Sittingbourne, England, ME10 3RN  
Registered in England and Wales 1196089.  
Directors: S. Rooney, P. Rooney.

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Investigations: Health and Safety Officer/HR/Management

Training: Human Resources Department/Training Coordinator

### Relevant policies

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

Whistleblowing policy - The organisation 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 - The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supplier 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 worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

Recruitment policy - The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

### Due Diligence

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

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- 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;
- 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 in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

### Board approval

This statement has been approved by the organisation's Board of Directors, who will review and update it annually. Our financial year from December to December.

**Stephen Rooney**  
**Dealer Principal – Sparshatt Truck & Van**  
Date: 8 April 2022

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