



# MODERN SLAVERY STATEMENT

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## A) ORGANISATION

This statement applies to all companies within and associated to Goball Ltd (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year ending 2018.

## B) ORGANISATIONAL STRUCTURE

We are a Automotive retailer based in the UK, our Customer Collection Centre, Vehicle Preparation Centre, Head Office and shared service function is based in Hull. Goball Ltd is controlled by a board of Directors and we employ just over 20 people. The trading name of the group is Interest Free 4 Cars.

The main activity carried out by the group is the is the sale, preparation and servicing of motor vehicles. The group performs the sale of motor vehicles via its website. Demand for our motor vehicles is consistently high throughout the year and is therefore not seasonal.

## C) DEFINITIONS

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

## D) COMMITMENT

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.



The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

#### **E) SUPPLY CHAINS**

In order to fulfil its activities, the group's main supply chains include those related to:

- Sourcing vehicles from UK based auction houses;
- Sourcing vehicles from UK based lease companies;
- Purchasing vehicles from customers as part of a part exchange offering;
- Purchasing vehicles directly from members of the public
- Purchasing vehicle parts from UK based suppliers;
- Obtaining vehicle industry related goods and services from UK based companies;
- Obtaining building maintenance and refurbishment services from UK based companies.

#### **F) POTENTIAL EXPOSURE**

The group considers its main exposure to the risk of slavery and human trafficking to exist in its use of contractors to fulfil its activities as they may not be fully compliant with legislation in the UK. We aim to minimise this risk by requesting the completion of a contractor questionnaire and by ensuring we communicate a zero tolerance approach to modern slavery.

In general, the group considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

#### **G) STEPS**

The group carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting an annual review of the controls of its suppliers.

The group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery is not taking place:



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- Reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- measures in place to identify and assess the potential risks in its supply chains;
- Embedding a culture of zero tolerance towards modern slavery;
- Raising awareness with our employees.

#### H) KEY PERFORMANCE INDICATORS

The group has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the group or its supply chains.

- All contractors are required to complete a contractor questionnaire both at the commencement of the contract and annually thereafter .
- All employees are made aware of the [Anti-Slavery and Human Trafficking Policy](#).

#### I) POLICIES

The Group has the following policy which further defines its stance on modern slavery:

- Anti Slavery and Human Trafficking Policy

#### J) TRAINING

The Group provides induction training which includes awareness of this Modern Slavery Statement and the groups [Anti Slavery and Human Trafficking Policy](#). We are also currently creating an e-learning awareness module for all staff to complete on an annual basis.

#### K) SLAVERY COMPLIANCE

The group's HR Manager holds responsibility for Slavery Compliance, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the group obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

**Date of approval: 10<sup>th</sup> January 2019**

**Matthew Gallagher**  
Sales Director, Goball Ltd