



## Modern Slavery Act 2015 – Statement for 2024

This statement has been published in accordance with the Modern Slavery Act 2015, which requires commercial organisations whose turnovers exceed the statutory financial threshold to disclose publically the steps taken to tackle slavery, servitude, forced labour and human trafficking (jointly known as modern slavery).

This statement covers **Newbegin Holdings Limited** and all related Group Companies and includes the approach we take to prevent modern slavery and human trafficking in our business and supply chains.

### Group Overview

**Thompson Commercials Group Ltd** are the holding company and made up of three companies:

**Thompson Commercials Limited** is the largest privately owned Renault Trucks dealer group in the UK, with 7 depots (Boston, Grimsby, Hull, Rainton, Sheffield, Teesside and Tyneside) spanning the East of England, and which has a long history in the commercial vehicle industry.

We supply the full range of New Renault and Isuzu Trucks, Pre-Owned Trucks, Trailers and Vans as well as part sales and vehicle repair, service and maintenance.

**Premium Leasing Ltd** offers Spot Hire, Long Term Hire and Contract Hire.

**Newbegin Financial Services** provides financial service solutions for customers of the Group.

The Group employs over 200 employees and operates on mainland UK.

The structure of the Group with Centralised Finance, HR and Payroll functions enables the business to exercise strict control over the areas of concern detailed in the Modern Slavery Act 2015.

### Policies and Principles

We respect human rights and aim to positively promote and support the human rights of our employees, workers in our supply chain and others affected by our business. We are committed to the detection and prevention of modern slavery or human rights abuses in our business and supply chains. Alleged breaches will be investigated. We expect the same high standards from all our contractors, suppliers and other business partners and we expect that our suppliers will hold their own suppliers to the same high standards.

We have adequate policies and procedures in place to ensure modern slavery and human rights abuses do not occur within the business. To ensure this:

- Our services agreement with suppliers includes specific clauses around complying with the Modern Slavery Act 2015 and request copies of their Modern Slavery Statements and the availability and suitability of such statements is considered in our procurement practices.
- Suppliers are required to notify us of any breach or potential breach of the Modern Slavery Act 2015.
- We require our suppliers to implement due diligence for their own suppliers and subcontractors to ensure there is no slavery or human trafficking in their supply chains.

- Centralised HR ensures compliance with all recruitment policies, procedures and legislation including right to work in the UK checks.
- Centralised Payroll ensures all legislated pay scale regulations are complied with and employees paid directly.
- Centralised Health and Safety ensures all employees work in a safe and hygienic environment.
- We have a grievance procedure setting out the steps we will take in order to investigate a complaint in a fair and balance manner.
- We have a whistleblowing policy which encourages workers to report any concerns about wrongdoing or dangers internally through the proper channels.
- We have an anti-corruption and bribery policy setting out clear guidance in respect of prevention of bribery and corruption by or involving our workers and obligations and potential liabilities.
- We have a recruitment and selection policy setting out our consistent approach to recruitment and selection and our adherence to our Equality and Diversity Policy.
- The Company Handbook is supplied to all employees on joining the business and is available at all premises.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff which covers:

- Initial steps to be taken if slavery or human trafficking is suspected
- Steps to escalate potential slavery or human trafficking issues to relevant parties

### Supply chains

Due to the franchise nature of our business, most of our supply chain relationships are with a small number of multinational vehicle manufacturers. The legal contracts in place contain specific policy clauses on the Modern Slavery Act to ensure both businesses conduct their operations in line with legislation.

This statement is made with respect to the financial year ended 31 December 2023 in accordance with S54 (1) of the Modern Slavery Act 2015. This Statement will be reviewed and updated (if necessary) annually to reflect our ongoing commitment to ensuring that its business and supply chains are free from slavery and human trafficking.

For and on behalf of

**Thompson Commercials Group Ltd**

*Ellis Thorpe*

**Date 01.01.2024**

Managing Director