



Norton Way Group

Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of Norton Way Motors Ltd and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2016.

Our Company

Norton Way Motors Ltd (the "Company") is owned by Marubeni Corporation and Marubeni Europe plc who in turn is a wholly-owned subsidiary of Marubeni Corporation, one of Japan's largest trading and investment companies. The Company is headquartered in Letchworth.

The Company is a Multi Franchise Motor Dealer Group operating in the UK. We supply New & Used vehicles into both the Retail and Commercial sectors. We also provide Servicing, Bodyshop facilities & Parts Provision via 8 Dealerships.

Our principles and values

It is the Company's policy that management and employees must comply with the highest standards of business and ethical conduct in all dealings with customers, suppliers, government officials and the wider community.

The Company's core values, in common with all companies in the Marubeni Group, are fairness, innovation and harmony.

Our supply chains

The Company operates in partnership with seven Global Motor Franchise Partners as an authorised franchisee.

We also sell the products directly to the customer, Business to Business or through a distributor network. We provide services including Finance and the sale of General Insurance products and we are fully authorised by the Financial Conduct Authority (FCA) to do so.

Relevant policies

The meaning of modern slavery and the Company's commitment to the fight against modern slavery are expressed in our Modern Slavery Policy.

The Company is committed to taking steps where reasonably practicable to ensure that modern slavery is not taking place in any part of its own business or in any of its supply chains.

We would also draw attention to the Basic Supply Chain CSR Policy of our parent company Marubeni Corporation, established in October 2008 (and subsequently amended), as referred to in section 4 of our Modern Slavery Policy.

Other relevant policies of the Company are its Anti-Corruption Policy and its Business Conduct Policy.



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The modern slavery risk

Our Modern Slavery Policy is a first step towards the Company having in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- monitor potential risk areas in our supply chains.

We recognise that modern slavery may exist to a greater or lesser extent in most if not all countries and in most industries. Given our business activities and the number of countries into which our supply chains extend, it would be reasonable to assume that the Company must therefore be at risk in respect of modern slavery to some extent.

Whilst we have no information to suggest that modern slavery exists in any of our supply chains, our initial analysis suggests that certain businesses or product lines may represent a higher degree of risk, and accordingly may require more detailed analysis and investigation.

Our next step is to deepen our understanding of the risks mentioned above (and any other risks that we identify) and then determine, based on the severity of the risk and the influence we may have in the relevant supply chains, an efficient and effective manner for carrying out due diligence proportionate to the identified risk.

In respect of business partnership risk, it is worth noting that we have established many long-standing relationships with suppliers and we consider that in many cases such long-term partnerships will involve less risk because each of us should have a better knowledge and understanding of each other's operations and policies.

Other specific steps already taken

- Our Parent Company, Marubeni Corporation have taken the following actions:
 - Appointed external advisors to:
 - inform us of our understanding of modern slavery;
 - advise us in respect of our compliance with the Act;
 - produce a guidance note on the provisions of the Act; and
 - train a number of key executives on the requirements of the Act.
- Norton Way Motors Ltd have then taken the following steps within its workforce:
 - Held a training Seminar with Directors & Key Senior Managers to inform them of the information
 - Circulated training literature to staff.
- We are currently in the process of sending our Modern Slavery Statement & Policy to all of our recent suppliers.



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- We are in the process of updating our standard terms of sale and our standard terms of purchase prior to issuing this Statement, so where such terms have been incorporated into the related contract and depending on the circumstances, we will have the ability to take appropriate contractual action (such as terminating or suspending the business) where we have a reasonable belief that modern slavery is occurring in the business or supply chain of the particular supplier.

Performance indicators

In driving the performance of the business

Individual contracts very often contain performance and delivery conditions. However, our initial review would suggest that we have not established, in respect of any particular supply chain or business and whether for internal use or for our suppliers, any formal performance incentives or indicators of the type that may unintentionally increase pressure on those who are producing the goods to a level which might in turn create an environment where acceptable labour standards are compromised.

In respect of reducing the risk of modern slavery occurring in our business or supply chains

Our aim is to send our Modern Slavery Policy to 100% of our recent suppliers, as indicated above.

We aim to train all new key managers on an ongoing basis.

Internal organisation in relation to modern slavery

We have dedicated Senior Management Team that reports to the Managing Director, who has overall responsibility for the Company's response to the challenge of slavery and human trafficking and, in accordance with the requirements of the Act, has signed this Statement below.

Effectiveness

It is too early to say with any certainty how effective the steps we are taking have been and will be in ensuring that modern slavery is not taking place in our business or supply chains. As part of our work for the next financial year we will consider how best to monitor the effectiveness of the actions taken.

This Statement relates to the Company's financial year ended 31 March 2016 and, where noted, steps taken subsequently up to the date shown below.

Signed:

David Grainger
Managing Director
Norton Way Motors Ltd

Date: 30th September 2016