

Modern Slavery and Human Trafficking Statement

1. Introduction

This statement sets out the Ford Fuels Groups actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within our own business and our supply chains. This statement relates to actions and activities during the current financial year ending 31st October 2020.

We are absolutely committed to preventing slavery and human trafficking in our business activities, and to ensuring that our supply chains are free from slavery and human trafficking.

2. Organisational Structure and Supply Chains:

We supply and deliver Fuels, Lubricants, AdBlue and Heating Engineering Services to the commercial and private sector. We currently operate from the following locations:

Farrington Gurney	BS39 6UU
Stalbridge	DT10 2RU
Membury	RG17 7TJ
Bow	EX17 6HU
Westerleigh	BS37 8QE
Theale	RG7 5BJ
Defford	WR8 9DF
Finmere	MK18 4AT
Presteigne	LD8 2HG
Weston-Super-Mare	BS24 9AD
Gloucester	GL2 5FD
Evesham	WR11 1GP
Yate	BS37 5NS

The Ford Fuels Group comprises the following corporate entities and trading styles:

Ford Fuels (Holdings) Ltd
Ford Fuels Ltd
Countrywide Oils Ltd
Hobbs Bros Ltd
GLB Ltd
Four Counties Lubricants Ltd
Silveys Energy

3. Our supply chains

Our supply chains include the sourcing of Fuels, Lubricants and Equipment related to the Oil Industry. We expect all those in our supply chain to comply with our Zero tolerance approach to slavery and human trafficking. Suppliers are required to demonstrate that they act ethically and within the law in their use of labour. Where suppliers are unable to demonstrate this standard, we will look to terminate the business relationship. The company directors are responsible for compliance in their respective departments and for their relationships.

4. Relevant Steps

We operate the following policies and procedures to identify modern slavery risks and prevent slavery and human trafficking in its operations:

Whistleblowing policy

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Our whistleblowing procedure is designed to make it easy for individuals to make disclosures, without fear of retaliation.

Business Ethics Policy

The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

Recruitment and use of agency staff

When we recruit staff we ensure that all potential employees have the legal right to work in the UK and that relevant employment legislation is adhered to. If we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we use using before accepting workers from that agency.

5. Due diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Where possible, we build long standing relationships with our suppliers and make clear our expectations of business behaviour. We have in place systems to encourage the reporting of concerns and the protection of whistle blowers. We expect each supplier in the fuel chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the fuel chain.

6. Performance indicators

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

Use of the Whistleblowing policy in relation to Modern Slavery and Human Trafficking

Reviews of our recruitment and payroll systems to ensure recruitment practices remain legally compliant. Reviews with our direct suppliers to understand the level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

7. Training

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 relevant members of staff.

All Directors have been briefed on the subject.

8. Director approval

This statement has been approved by the company's board of directors, who will review and update it annually.

Director's signature:

A handwritten signature in black ink, appearing to be 'J Ford', written over a horizontal line.

John Ford
Director

1st December 2019