



Norton Way Group

Slavery and Human Trafficking Statement (FY2016)

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”). It has been approved by the board of Marubeni Europe plc and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2017 (“FY2016”).

Our company

Norton Way Motors Limited (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 six 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.



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

The modern slavery risk

Adopting the Modern Slavery Policy was 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 recognized that modern slavery may exist to a greater or lesser extent in most if not all countries and in most industries. Given the diverse range of 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.

During FY2016 Marubeni Corporation distributed guidelines to relevant group companies to assist them in efforts towards the prevention of human rights violations in their own businesses and in their supply chains.

Having considered these guidelines the Company has established a methodology for the assessment of risk of human rights violations. 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.

Other specific steps already taken prior to 31 March 2017

- Held a training Seminar with Directors & Key Senior Managers to inform them of the information.
- Circulated training literature to staff

Other specific steps in the process after 31 March 2017

- We are currently in the process of sending our Modern Slavery Statement & Policy to all of our recent suppliers.



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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

As noted above, we are about to send our Modern Slavery Policy to our recent suppliers.

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. However, as a result of the steps taken so far we are confident that the risks are now much better understood.

This Statement relates to the Company's financial year ended 31 March 2017 and, where noted, steps taken subsequently up to the date shown below.

Signed:

David Grainger
Managing Director
Norton Way Motors Ltd

Date:

26/9/17