

Unit 11 Metro Trading Centre
Second Way
Wembley
Middlesex
HA9 0YJ

Modern Slavery Statement

Introduction

This Statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Highway Stops Retail Ltd's Slavery and Trafficking Statement for the financial year ending 31st December 2018

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms such as slavery, servitude, and forced compulsory labour, and human trafficking. All have a common feature of depriving a person's liberty by another in order to exploit for personal gain.

Highway Stops Retail Ltd is committed to combat slavery in all its forms from within the organisation and within any organisation or persons we conduct business with. This will include suppliers of good and services.

Highway Stops Retail Ltd Business

Our principal business is the ownership and operation of Fuel stations within the UK.

This business consists of:-

- The operation of the stations and facilities such as Shop, Car Wash, etc
- The supplies of fuels and services to the station,
- The supply of Fuels to the General public
- The maintenance of the stations and equipment

The Operation of the Stations

Highway Stops Retail Ltd, work with Commission Operator Managers, to operate all facilities within the scope of the stations in our stations or any that may be leased to us. They provide, and look after the staff operating the facility. The Commissioned Operator is also contracted to ensure the safety of the site and employees.

Highway Stops Retail Ltd also contracts outside contractors to provide safety and legal assistance and carryout checks to ensure compliance with the requirements of the various authorities. Regular visits and checks also carried out by members of company to ensure Operators are carrying out their responsibilities under the contract.

The supplies of fuels and services to the station

All Wet Stock is managed by Highway Stops Retail Ltd

All Dry Stock managed by Commissioned Operator.

All Services to the site managed by Highway Stops Retail Ltd.

Labour to meet these requirements are supplied by Commissioned Operator

The maintenance of the stations and equipment

Highway Stops Retail Ltd manages and co-ordinates the supply of Fuel and the maintenance of the site machinery, all fixed assets, and appoint external experts to help carry out these responsibilities

Our Policies on Slavery and Trafficking

- 1 Ensure that everyone within the organisation is aware of our Policy on Slavery and Trafficking. This is carried out by regular discussions of the matter and regular checks carried out by member of the staff and where necessary appoint outside consultants.
- 2 Ensuring that suppliers of both dry and wet goods understand that we have such a policy in place and request their policy statement prior to any contractual alliance. Due diligence shall be carried out where possible.
- 3 Ensuring that any future Commission Operator agreements issued will include to acceptance and operation of our Slavery and Trafficking policy.
- 4 Ensuring that a responsible person is always available for any whistle blower to have confidential access to make report of any concerns they may have with respect to Slavery or any work related concern. An manager is appointed to investigate all such concerns
- 5 Ensuring that Highway Stops Retail Ltd employees carry out regular checks of stations To ensure compliance with the above these checks should include during current routine visits:
 - Human Rights Policy
 - Environmental Policy
 - Anti-Bribery Policy
 - Health and Safety Policy
 - Supplier Code of Conduct

Performance

Not being a large company the management of Highway Stops Retail Ltd have a working relationship with most members of the organisation. In this way we have knowledge of most people though normal working day. This relationship has not shown up any discrepancies to date which gives us the confidence in our ability to ensure such practices as Slavery or trafficking are not conducted within the operations.

When it comes to suppliers of goods and services these are inside our area of investigation there we ensure that we receive assurances from these suppliers that they also comply with these policies, and obtain copies of their own Policy on Slavery and human trafficking.

Training and Awareness

It is important to ensure that all within The Highway Stops Retail Ltd organisation is fully aware of our and their responsibilities under the Modern Slavery Act 2015 and we are committed to give information to all employees of our Policy.

With Subcontracts and suppliers we will ensure that they are also aware of our policy. This Policy will be reviewed each year, and updated and issued where necessary.

Risk Analysis

Task	Level	Actions
Employees of Franchise	Med	Slave Policy to be written into renewal Contract & Audits carried out by Highway Stops retail Ltd employees
Hand Car Wash Employees	High	Policy to be written into renewal Contract & Audits Franchisee to oversee where possible
Maintenance Contractors	Low	High skill levels enquired but suppliers renewal contract to include Policy
Supplies of Dry Goods	Low	Very difficult to carryout due Diligence on these suppliers. Obtain copy of their Slave Policy and subject all contracts to compliance.
Suppliers of Wet Goods	Low	Very difficult to carryout due Diligence on these suppliers. Obtain copy of their Slave Policy and subject all contracts to compliance.

This Statement is approved by the Directors of Highway Stops Retail Ltd

Name: Shilan Raja on the behalf of the Board of Directors



Date:- 05/04/19