



## **Modern Slavery Act 2015: Slavery and human trafficking statement for 121222 Holdco Limited and its subsidiaries**

**INTRODUCTION FROM THE BOARD** Slavery and human trafficking continues to be a hidden blight on today's global society. We all have a responsibility to be alert to the risks, however minor, in our business and in our wider supply chain. We are proud of the steps we have taken and are in the process of taking, to combat slavery and human trafficking and are committed to constantly improving our practices in this area. We undertake all reasonable and practical steps including regular visits to factories and warehouses, to ensure that our standards are implemented throughout the businesses of our suppliers for the group of companies headed by 121222 Holdco Limited ("GSF Car Parts Group"). We will only trade with those who fully comply with our standards, or those that are taking verifiable steps towards compliance and, if we find any instances of non-compliance, we will take appropriate action.

We issue our Anti-Slavery and human trafficking policy to all of our key suppliers and employees, and adherence and compliance to the policy is monitored and measured. We do not trade with any suppliers who do not adhere to our policy, and we have received confirmation of compliance to our policy back from all of our key suppliers. Additionally, the company undertakes regular factory audits at our key suppliers to check compliance with our policies.

### **ORGANISATION'S STRUCTURE**

We are a leading distributor of automotive parts, supplying OE and aftermarket parts to the independent motor trade and end consumers through our network of branches and online platforms.

This statement applies to all the group of companies headed by 121222 Holdco Limited ("GSF Car Parts Group") - see Appendix 1. The GSF Car Parts Group has over 2,500 employees and operates throughout the UK.

### **OUR BUSINESS**

Our business is organised into a number of branches and units, please [click here](#) to find out more.

### **OUR SUPPLY CHAINS**

Our supply chains include the worldwide sourcing of automotive parts from major suppliers. As part of our overall risk assessment, we have identified several countries that we source from (China, India, Turkey and Vietnam), that have the largest estimated absolute numbers of people in modern slavery.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we:

- Identify and assess potential risk areas within our supply chains.
- Wherever possible, build long term relationships with our suppliers and make clear our expectations of acceptable business behaviour.
- Encourage the reporting of concerns and protecting whistle blowers.



**SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain to comply with our values.

The Company Directors are responsible for compliance in their respective departments and for their supplier relationships.

**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 have rolled out a mandatory online training course to all our supply chain, product and procurement staff. Additionally, all our staff have access to our anti-slavery and human trafficking policy and all other company policies.

**OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING – KPI's**

We measure compliance to our Anti-slavery and human Trafficking policy by recording our key supplier's acceptance to our policy. We will not trade with suppliers that do not adhere to our policy and we will endeavour to increase the number of key suppliers confirming acceptance.

We have increased our key supplier confirmation of compliance to our policy return rate, from 65% in 2020, to 100% in 2021.

This statement has been approved by the board of directors of 121222 Holdco Limited, pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2021.

A handwritten signature in blue ink that reads "M A Edrino".

Signed:

Position: President & Chief Operating Officer

On behalf of: 121222 Holdco Limited

Date: 7<sup>th</sup> February 2022



## APPENDIX 1

Entities covered by this statement:-

- 121333 Limited
- PA Topco Limited
- PA Group Holdings Limited
- GSF Car Parts Limited
- The Parts Alliance Limited
- DDS Midco Limited
- Data Development Services Limited