

Modern Slavery Statement 2019

About Us

Alternative Route and Alternative Route Leasing are part of the Bridle Group and a trading name of Hanborough Enterprises Limited ('the Company', 'Us', 'We' or 'Our').

Hanborough Enterprises Limited is regulated for consumer credit activities and insurance distribution by the Financial Conduct Authority – Firm Reference Number 631448. We are a broker and not a lender. You can check this information at www.fca.org.uk

Hanborough Enterprises Limited is registered with the Information Commissioners Office for the processing of data under The Data Protection (Charges and Information) Regulations 2018. Our Data Protection Licence number is Z264186X. You can check this information at www.ico.org.uk

Hanborough Enterprises Limited is a member of the British Vehicle Rental and Leasing Association and abide by their Code of Conduct. For further information visit www.bvrla.co.uk

Introduction

We are committed to ensuring that our staff are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and or similar human rights abuses. We are also committed to ensuring our approach to tackling modern slavery in our own business and throughout our supply chains is consistent with our disclosure obligations under the Modern Slavery Act 2015.

This Statement sets out our commitment to prevent slavery and human trafficking in our business activities and the steps that we have put in place to ensure that there is no slavery or human trafficking in our own business and supply chains. We all have a duty and responsibility to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

Our primary business activity is that of a Credit Broker operating in both the corporate and consumer market places. We work with a select panel of finance providers who provide funding options for vehicles that we source through our network of dealerships. We are not a funder nor a lender.

We also offer ancillary products including maintenance packages, fleet solutions, short term vehicle hire and asset finance through carefully selected suppliers.

The Company currently operates solely in the United Kingdom

Our Process for Managing Risk

In order to assess the risk of modern slavery, we use the following processes:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains
- Review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks
- Protect whistle-blowers

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies: The Head of Compliance is responsible for creating and reviewing policies. The process by which policies are developed is reviewing legislation, looking at best practice and adapting to the needs of the company. Policies are reviewed with the Board of Directors on an annual basis or sooner as required
- Risk assessments: The Branch Principal and/or Director is responsible for risk assessments in respect of human rights and modern by a process of reviewing our staff recruitment and salaries and evaluating our suppliers
- Due diligence: The Managing Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking

Training

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business our Modern Slavery Policy we provide training within our induction programme for all new staff and operate an annual training programme for all staff members.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Whistleblowing Policy - We encourage our workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- Business Risk Policy – We assess all risks to the business, including modern slavery and human trafficking
- Corporate Social Responsibility (CSR) Policy - Our CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier, and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all staff to have completed training on modern slavery on an annual basis.

Review of this Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking Statement for the year ending 31 December 2019. It has been approved by the Board of Directors, who will review and update it annually.