

(H10) Ethical Trading Statement – August 2025

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All TIMS files on the server are controlled - any printed documents are uncontrolled and should be used for reference only

Our Aim

Topspeed endeavours to conduct all its business in an honest and ethical manner. In line with The Modern Slavery Act 2015 the directors take a zero-tolerance approach towards slavery, servitude, forced or compulsory labour and human trafficking. We are committed to the promotion of ethical business practices and policies that protect workers from being abused and exploited in their own organisation and global supply chains.

Particularly, we are fully aware that the transport industry operates in the Gig Economy, with a high turnover of staff and shoddy employment practices. In contrast to this, since formation of the business in 1985 by the current CEO, Stephen Clegg, we have always employed all our staff on formal contracts of employment and have never used 'workers' or casual labour.

To observe the code Topspeed has assigned responsibility for compliance to the Assurance Director, Sarah Gingham-Clegg.

Training

We are aware that our employees may come into contact with people who are subject to exploitation and need to be aware of the tell-tail signs and how to report the suspicious activity. To this end we have engaged the Charity "Unseen" who operate in real life situations in the UK to help tackle slavery and worker exploitation. E-learning courses have already been undertaken by some senior managers and face-to-face courses at the Academy are planned for 2025 – 2026, initially with the wider management team and thereafter with the driver pool.

We have displayed the Modern Slavery reporting Helpline on noticeboards at the HQ and broadcast this to all our drivers located around the country as a message sent over the fleet tracking system.

Freedom of association and the right to collective bargaining are respected

Topspeed adopts an open attitude towards the activities of trade unions and their organisational activities.

All Topspeed employees, without exception, have the right to join or form trade unions of their own choosing and to bargain collectively. Employee representatives are not subjected to discrimination of any kind and are supported to carry out their representative functions in the workplace.

Working conditions are safe and hygienic

A safe and hygienic working environment is provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps are taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, as far as reasonably practicable, the causes of hazards inherent in the working environment.

Employees receive regular and recorded health and safety training, and such training is repeated for new or reassigned employees.

Access to clean toilet facilities, drinking water and, if appropriate, suitable clean facilities for food storage, is provided.

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Living wages

Wages and benefits paid for a standard working week meet, and normally exceed, the national legal standards for wages.

All Employees are provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and payslips contain sufficient detail to enable them to understand what is included in their wages and how those wages are calculated.

Due to the nature of our business, our driving staff are employed on variable hours contracts. However regular monitoring ensures that work is allocated fairly and reasonably across the workforce and that no driver is discriminated against in favour of another.

Deduction from wages as a disciplinary measure is not permitted. Only deductions from wages expressly provided for by law and/or with the written consent of the employee are permitted.

Working hours

Topspeed complies with national laws and the UK Domestic Driver's Hours Rules. Hours are restricted to 48 hours per week when averaged over 17 weeks, unless the employee chooses to volunteer for extra hours by signing an Opt-out Form. Employees may be invited to do occasional weekend work; such work is voluntary, and is compensated at a premium rate.

Regular employment

Topspeed complies with national employment laws and good practices. All staff, including drivers, are employed under an employment contract and promotes good employer/employee relationships.

We believe in investing in our employees through training, career progression opportunities, good working practices and a clear emphasis on health and safety in the workplace and driver safety standards.

Apprenticeship schemes and other work experience schemes are used only when there is a commitment to impart skills and training and a view to providing genuine employment opportunities.

Harsh and inhumane treatment

All forms of abusive or aggressive behaviour, whether physical or verbal, including bullying and all forms of unlawful discrimination or harassment is prohibited. The company's rules are clearly set out in our employment contracts and staff manuals, and employees are actively encouraged to report any incidents of concern. Complaints are taken seriously and dealt with under the company's grievance and disciplinary procedures as appropriate.

Child labour

Topspeed does not employ children under the minimum age and does not knowingly contract with companies which permit the employment of children either directly or as part of their supply chain.

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Suppliers

Topspeed works only with suppliers which have ethical standards consistent with our own (as outlined above).

In our dealings with third parties, we do not knowingly trade with suppliers or contractors who act in contravention of the Modern Slavery Act 2015. Topspeed uses only a few suppliers, however the responsible procurement of goods and services is an important aspect of its risk management and corporate responsibility.

The directors recognise that unethical activity on the part of a supplier can have a direct impact on our own reputation and business continuity.

Wherever possible Topspeed endeavours to ensure its suppliers respect human rights, labour standards, health, safety and the environment. Very large companies with a turnover of £36 million and above, such as road fuel retailers and vehicle manufacturers, are required by law to publish an annual statement confirming that slavery & human trafficking are not taking place in the business or in the supply chain. This statement requires the company to set out the steps it has taken to ensure this is not occurring in any part of the supply chain.

The local businesses we use for our HQ (such as maintenance, heating, plumbing, electrical etc) and supply vehicle parts for the workshop are small, sometimes family run companies and may have very few formal procedures. Topspeed endeavours to nurture a relationship with these companies and this may mean working with them and encouraging them to improve their standards rather than automatically excluding them from our supply chain.

In any event Topspeed will not use suppliers who are unwilling to adopt standards of ethical behaviour that are consistent with our own.

This policy forms part of Topspeed's Documented Management System



Stephen Clegg
(CEO)



Sarah Gingham-Clegg
(Assurance Director)



Gillian Lockley
(Managing Director)

Dated 1st August 2025