

FORCE INDIA FORMULA ONE TEAM LIMITED

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Force India Formula One Team Limited during the year ended 31 December 2016 to ensure the prevention of modern slavery and human trafficking in its business and supply chains.

INTRODUCTION

Force India Formula One Team Limited (“Force India”) and its Board of Directors recognise that Force India’s business deals with many different organisations within its supply chain, in addition to employing a large number of staff and utilising the services of both agency workers and contractors.

Force India complies with the United Kingdom legislation and guidance on employment law and, more specifically, the Modern Slavery Act 2015 (the “Modern Slavery Act”). We have taken all reasonable steps to review our existing compliance and risk management processes to determine what measures already exist and what, if any, further measures we may need to adopt to comply with the Modern Slavery Act and to ensure the prevention of slavery and human trafficking taking place in any part of our business and its supply chain.

Modern slavery can occur in various forms, including forced or compulsory labour, human trafficking and servitude. All of these forms involve the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. Such actions are a criminal offence under the Modern Slavery Act.

This statement governs our business dealings and the conduct of the organisations and personnel with whom we contract directly or who we appoint to act on our behalf. We expect all who have, or seek to have, a business relationship with Force India ensure that they familiarise themselves with our anti-slavery values and documentation and to act at all times in a way which is consistent with such values.

OUR BUSINESS STRUCTURE

Force India has been in operation since 1991, based in Silverstone, Northamptonshire. As a racing team that participates in the FIA Formula One World Championship, Force India has an international supply chain, with direct sourcing of parts, equipment, services and merchandise performed by its employees, contractors and third party organisations.

Force India’s supply chain is predominately sourced within the United Kingdom, France, Germany, Italy, Austria and the USA through local contractors, although services are also obtained from each country where the team races.

OUR ANTI-SLAVERY VALUES

We strive for a culture of good governance, operating to a set of core values which reflect our relationship with the key stakeholders of Force India: clients, consultants, subcontractors, suppliers and employees.

Our key values within our business relationships reflect our stance against the exploitation of individuals in any form and, in particular, the offences under the Modern Slavery Act.

We expect the same values from our employees and business partners.

PURPOSE OF THIS STATEMENT

This Statement aims to prevent opportunities for modern slavery to occur within our business and our supply chain. The term “modern slavery” has the meaning given in the Modern Slavery Act.

Working within the guidelines of the Modern Slavery Act, we are committed to acting ethically and with integrity in all business dealings and relationships. We use all reasonable endeavours to implement and enforce effective systems and checks to ensure modern slavery is not taking place in our own business or those of our suppliers.

STEPS FOR THE PREVENTION OF MODERN SLAVERY

1. We use all reasonable endeavours to ensure transparency in our own business and in our approach to preventing modern slavery throughout our supply chains. We expect the same standards from our contractors, suppliers and other business partners.
2. Our contracting process includes issuing a questionnaire to both our current and new suppliers, requesting reasonable disclosure of their procedures with their supply chain, in order that we can do what is reasonably practicable to prohibit the use of forced, compulsory or trafficked labour, or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same standards.
3. We undertake a review of the replies to our supplier questionnaires in order to ensure we have a consistent approach to the prohibition of modern slavery.
4. We have a designated team of staff members who are familiar with the requirements under the Modern Slavery Act and who understand our procedures of review within our supplier base.
5. As part of our supplier risk assessment, we will follow up with those suppliers who are obliged to comply with the Modern Slavery Act in the event that they do not have the required documentation and procedures in place. We will provide guidance on the appropriate time-frame within which our business reasonably requires these suppliers to comply. We will make all reasonable endeavours to undertake an annual audit, in particular with regard to suppliers that fall within the Modern Slavery Act, to ascertain their level of compliance and ongoing duties to implement in procedures compliant with this legislation.

6. We check all recruitment agencies that act on our behalf to ensure they carry out our recruitment process for employees, consultants and sub-contractors in a transparent manner and that they comply with the United Kingdom immigration rules and the Modern Slavery Act.
7. Whilst recognising our statutory obligation to set out the reasonable steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we do not control the conduct of individuals and organisations in these chains.
8. We will comply with this policy but are not in a position to influence our suppliers' activities, particularly if these are not disclosed to us. However, to underpin our compliance with practical steps, in summary, we intend to adopt the following key measures:
 - (i) conduct a risk assessment to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that all reasonable efforts can be focused on those areas;
 - (ii) have an ongoing dialogue with our suppliers to convey our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses, through our supplier questionnaire;
 - (iii) where appropriate, as part of our supplier audit, we may need to introduce additional contractual provisions for our suppliers to confirm their adherence to this policy and to accept our right to audit their activities and relationships (where practicable), both routinely and at times of reasonable suspicion.
9. From the financial year 2016, we will include in the directors' report accompanying our annual financial statements a reference to Force India's Modern Slavery and Human Trafficking Statement, which will be added to our website from 2017 and reviewed regularly.

RESPONSIBILITY FOR THE POLICY

Ultimate responsibility for this policy lies with Force India's Board of Directors, who have the overall accountability for ensuring this policy and its implementation complies with our legal and ethical obligations.

Employees who are tasked with the responsibility of reviewing suppliers under this policy are responsible for ensuring those reporting to the Board of Directors understand and comply with this policy and are given adequate training.

ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Our whistleblowing procedure provides guidance on how concerns can be communicated to Force India. If an employee has any concerns regarding suspected modern slavery associated with Force India or any of our suppliers, they should use the whistleblowing procedure to report it to us. The whistleblowing procedure may be found in our staff handbook.

If an employee has any concerns they should approach their line manager, equivalent senior leader or Human Resources. If the matter is extremely serious then a member of the Board of Directors of Force India should be approached.

SAFEGUARDS


We encourage openness and support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion of modern slavery in any of our supply chains. Any allegations made which are found to be malicious will result in disciplinary action being taken against the individual.

COMMUNICION AND AWARENESS OF THIS POLICY

Our approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate thereafter.

REVIEW

Following its initial adoption, this Modern Slavery and Human Trafficking Statement will be reviewed by Force India's Board of Directors on an annual basis and may be amended from time to time.

Signed: 

Print Name: VIJAY MALLYA

Authorised to sign on behalf
of the Board of Directors

Date: 18 December 2016

Next Review Date: 1 December 2017