

Specialist Cars Ltd

Modern Slavery and Human Trafficking Statement

INTRODUCTION

This statement is made by Specialist Cars Group of companies pursuant to Section 54 of the Modern Slavery Act 2015 to identify actions taken by Specialist Cars Group during the financial year ending 31st December 2018.

OUR BUSINESS

Specialist Cars are one of the largest privately owned BMW and MINI Retailer groups in the UK. Our business consists of three BMW and MINI Centres located in Stevenage, Luton and Tring, as well as an Approved BMW and MINI Bodyshop located in Hitchin, Hertfordshire. Specialist Cars was founded in the 1970's and is proud to have over 40 years heritage and an experienced work force of over 300 employees.

Specialist Cars are a leading BMW i Authorised retailer, paving the way with Electric Motoring. You can visit our dedicated BMW i lounge and discuss your electric requirements with our BMW i genius.

Specialist Cars are your local experts for everything BMW and MINI; from purchasing your new car or browsing our selection of Approved Used cars to all aspects of aftersales care for your BMW or MINI. We have state of the art authorised service centres providing customers routine maintenance care such as servicing and MOT, plus a wide range of lifestyle and car accessories, parts and smart repairs.

OUR SUPPLY CHAINS

These lower risk manufacturer supply chains constitute the majority of our total supply chain. We are pleased to note that most of these manufacturer suppliers uphold their own standards of anti-slavery and anti-human trafficking compliance and some of our partner manufacturers are involved in ethical committees. We review the statements from our manufacturer suppliers and the steps they are taking in relation to modern slavery and we will continue to do so regularly.

We also identify the following services within our supply chains:

- Valeting services.
- Cleaning services.
- IT services.
- Vehicle delivery services.
- Training.
- Office stationery suppliers.
- Coffee suppliers.
- Printer and copier suppliers.
- Promotional branded items suppliers.
- Bodyshop contractors.
- Building contractors.
- Recruitment agencies.

DUE DILIGENCE

The Specialist Cars Group sources and sells products and parts from a broad range of national and international suppliers. Due to the breadth of our businesses and supply chains The Specialist Cars Group is not in a position to check every business relationship. The principal areas in which there is a risk of human trafficking and slavery are those related to our supply chains. The Specialist Cars Group takes a risk based approach in assessing our potential exposure to slavery and human trafficking in our supply chains.

Although the Specialist Cars Group recognises our statutory obligation to take practical steps to prevent modern slavery and human trafficking from occurring in our supply chains, the Specialist Cars Group is not able to control the conduct of individuals and organisations in our supply chains.

The practical steps which the Specialist Cars Group intend to take are as follows:

- Conduct risk assessments to determine which parts of the business and which suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- Engage with those suppliers identified as potentially at risk in order to communicate to them our Anti-Slavery Policy and to understand what measures they have taken to ensure modern slavery is not occurring in their businesses.
- Ensure all business activity complies with minimum wage legislation and to ensure that this requirement is met by all our contractors who are identified by the Specialist Cars Group as potentially at risk.
- Ensure all Specialist Cars Group employees have the right to work in the UK and to ensure that this requirement, to only employ staff with the right to work in the UK, is met by all our UK contractors who are identified by the Specialist Cars Group as potentially at risk.

In the event the Specialist Cars Group become aware of any instances of non-compliance from our suppliers, each instance will be investigated and assessed by the Specialist Cars Group on a case by case basis. Remedial action will be taken appropriate to the circumstances of each case. The Specialist Cars Group will temporarily suspend our business (to the extent permitted under contract or by law) with any supplier who it suspects of non-compliance. If a supplier continually fails to comply, then the ultimate sanction will be for the Specialist Cars Group to cease to trade with that supplier (to the extent as permitted under contract or by law).

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 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 business and in our supply chains.

TRAINING

This statement and our Anti-Slavery Policy will be communicated to all employees and be included in the Specialist Cars Group induction, to ensure a high level of understanding of the company's zero tolerance approach to modern slavery and human trafficking in our supply

chains and our business and our commitment to preventing modern slavery and human trafficking from occurring in our business and supply chains.

The Specialist Cars Group operates a number of policies and procedures which promote and enforce the company's zero tolerance approach in order to reduce the risk of slavery and human trafficking from occurring. These policies and procedures form are reviewed regularly and include:

- Modern Slavery Policy.
- Equal Opportunities Policy.
- Grievance Policy.
- Whistleblowing policy.
- Anti-corruption and bribery Policy.
- Anti-harassment and Bullying Policy.
- Employee code of conduct.
- Supplier code of conduct.
- Recruitment policy.

RESPONSIBILITY FOR THE POLICY

Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Management Team and Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

REVIEW

This Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis and may be amended from time to time.

Anti-Slavery and Anti-Human Trafficking Policy

Version: 25th May 2019

Approval Signature: Clive Fletcher, Managing Director