



Slavery and Human Trafficking Statement

Applies to Vertu Motors plc, Bristol Street First Investments Limited, Bristol Street Fourth Investments Limited, Vertu Motors (VMC) Limited, Grantham Motor Company Limited, South Hereford Garages Limited, Greenoaks (Maidenhead) Limited and Albert Farnell Limited

Purpose

The Modern Slavery Act 2015 (**MSA 2015**) focuses specifically on the issue of modern slavery to ensure offenders are suitably reprimanded with severe sentences. Modern slavery encompasses the offences of: 'slavery' where ownership is exercised over a person; 'servitude' which involves the obligation to provide service imposed by coercion; 'forced or compulsory labour' involves work or service exacted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily; and 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

The MSA 2015 requires large businesses, with sales of over £36 million, to be transparent about their efforts to eradicate Slavery and Human Trafficking. This statement therefore explains the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or any part of our business. This statement is made pursuant to Section 54, Part 6 of the MSA and applies to the group companies listed above.

Group structure

The Vertu Group is composed of a group of trading subsidiaries under the holding company, Vertu Motors plc. Each trading subsidiary operates motor retail dealerships (both new and used vehicles) and service and repair centres divided by franchise, or other ancillary businesses. The ancillary businesses operated by the Group include the conversion of vehicles for wheelchair use, the retail of taxis, the provision of leased cars and the online sale of vehicle parts. All of its operations are based in the United Kingdom and the Group currently employs around 5,300 colleagues.

Policies and training

We have an anti-slavery and trafficking policy in place internally, which is available to all on Vertu Central and can be accessed by third parties on request. We have introduced a third party operated whistleblowing reporting system to improve the ability for colleagues and others to report any concerns confidentially and effectively. Details of this service are displayed at all of our locations and have been communicated to all current colleagues.

As part of the Group's induction process and throughout colleagues' employment with us, we train all colleagues to treat others with respect and courtesy as well as ensuring they adhere to all relevant laws, regulations and standards. This is an ongoing process and includes a compulsory online element covering various compliance topics. This online training is part of the induction process and is also being rolled out to all colleagues in 2017. The modern slavery module is compulsory for all management and central service colleagues to ensure that awareness is there across the Group.

We focus on ensuring our management team is not only aware of the requirements to be alert to modern slavery but can also address concerns raised by their team or any suppliers. If any colleague is found in breach of our policies, we would ensure suitable disciplinary action is taken which could include termination.

Our Group values include 'Integrity' and 'Respect' and these are embedded in the culture of the Group.

Supply Chain Overview

Our main suppliers are the vehicle manufacturers themselves who supply vehicles and parts, and the supply chain prior to a completed vehicle is complex and many layered and has overseas elements.

This makes it challenging for Vertu Motors plc, as a motor retailer, to see or manage any issues in that supply chain. Respecting human rights and environmental issues in that supply chain is ultimately our manufacturer suppliers' responsibility.

However, the Group has a number of other significant suppliers with contracts negotiated at Group level and numerous smaller suppliers at a Group or local level.

Supply Chain Standards

We allow all individuals who work or provide services to us the right to freely choose employment and, the right to associate freely with other individuals. As a result of our training, we offer an environment which is free from harassment and unlawful discrimination. We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation. We do not engage in forced or involuntary labour and have a zero tolerance approach to this, meaning we do not tolerate any of our suppliers engaging in such conduct.

In our standard procurement process for group-wide contracts, we issue contracts that incorporate standard Terms and Conditions (**T&Cs**). From 2017 these will include specific requirements on our suppliers to adopt and enforce policies to address issues such as forced labour. We are also asking all significant group-wide suppliers to confirm that they have read our policy on anti-slavery and trafficking and will adhere to it where relevant and:

- whether they have implemented their own contractual arrangements with prohibitions against modern slavery and trafficking; and
- whether they have their own anti-slavery and human trafficking policy and have conducted a modern slavery risk assessment.

We seek to identify and do business with companies that have values consistent with ours, including applying these expectations to their own supply chain.

From 2017 our T&Cs clearly state that we will not tolerate forced labour (including human trafficking) or child labour or abusive disciplinary processes in our supply chain. We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered.

Effectiveness

As we have a zero tolerance approach to modern slavery, and have not identified any indications that it occurs in our supply chain, we have not adopted any performance indicators. However, our ongoing work with our suppliers should indicate if any of them are not implementing appropriate measures or cannot provide the necessary confirmations to us.

Approval

The board of directors of the Company approved this statement at its board meeting on 27 February 2017.

Dated 15 March 2017
Vertu Motors plc

