

## **Slavery and Human Trafficking Statement**

For the financial year ending 31 December 2018

### **Introduction**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Marshall Motor Holdings Plc has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing appropriate and effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains.

The Modern Slavery Act 2015 (the "**Act**") introduced changes in UK law focused on increasing transparency in supply chains. Specifically, large businesses are required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery.

This statement sets out the steps we have and are taking to ensure that slavery and human trafficking are not taking place in any of our supply chains or businesses and is made pursuant to section 54(1) of the Act. This statement applies to Marshall Motor Holdings Plc and each of its subsidiary companies set out in the Appendix (together, the "**Group**")

### **Group Structure**

The Group's principal activities are the sale of passenger cars and commercial vehicles, vehicle servicing and associated activities.

All of the Group's operations are based in the United Kingdom and the Group employs nearly 4,000 colleagues across its businesses.

### **Our Supply Chains**

The Group's principal suppliers are global vehicle manufacturers which supply the Group vehicles and parts for onward sale to customers and under whose franchise agreements the Group operates its motor dealership businesses.

In addition, the Group has commercial arrangements with vehicle finance and insurance providers which provide finance and insurance products to the Group's customers. The Group also engages with other providers of goods and ancillary services (including oil and consumables supply, valeting services etc).

### **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 any part of our business. We have adopted an Anti-Slavery Policy which 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 supply chains.

## **Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk, we continue to put in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, focusing on the highest risk areas.
- Protect whistle blowers.

## **Supplier Adherence to Our Values**

We have zero tolerance to slavery and human trafficking. We continue to review our supply chain management process to ensure all those in our supply chain and contractors comply with our values and their legal obligations. This includes seeking confirmation from key suppliers of the Group that they have implemented contractual arrangements which prohibit modern slavery and trafficking and seeking confirmation that they have adopted their own anti-slavery and human trafficking policies. We have also introduced changes to our standard terms and conditions of trading to require suppliers to comply with all applicable anti-slavery and human trafficking laws. A number of our key commercial supply arrangements already contain specific provisions regarding slavery and human trafficking and contractual arrangements will be updated, where necessary, upon renewal.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will be providing appropriate training to our staff to raise awareness and highlight any areas of concern they may have.

## **Effectiveness in Combating Slavery and Human Trafficking**

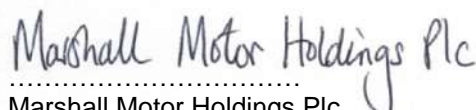
We have not identified any instances or indications that either slavery or human trafficking occurs in our supply chain. As such, we have not considered it necessary to adopt any formal performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. We intend to continue to keep this under review.

## **Further Steps**

As set out in above, the Group continues to take a variety of further steps to ensure that neither slavery nor human trafficking occurs either in our business or in our supply chain.

## **Approval**

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 financial year ending 31 December 2018.



Marshall Motor Holdings Plc  
Date: 8 April 2019

## Appendix

### Companies to which this Slavery and Human Trafficking Statement applies

Marshall Motor Holdings Plc  
Marshall Motor Group Limited  
Marshall of Cambridge (Garage Properties) Limited  
Tim Brinton Cars Limited  
Marshall of Ipswich Limited  
Marshall of Peterborough  
Marshall of Stevenage Limited  
SG Smith Holdings Limited  
SG Smith Automotive Limited  
SG Smith (Motors) Limited  
SG Smith (Motors) Beckenham Limited  
SG Smith (Motors) Forest Hill Limited  
SG Smith (Motors) Crown Point Limited  
SG Smith (Motors) Sydenham Limited  
SG Smith Trade Parts Limited  
Prep-Point Limited  
Marshall North West Limited  
Marshall of Scunthorpe Limited  
Silver Street Automotive Limited  
Exeter Trade Parts Specialists LLP  
CMG 2007 Limited  
Astle Limited  
Crystal Motor Group Limited  
Ridgeway Garages (Newbury) Limited  
Pentagon Limited  
Ridgeway TPS Limited  
Ridgeway Bavarian Limited