

Modern Slavery Act Statement

Anti - Slavery and Human Trafficking Statement for the 2023 Financial Year (Jan- December) - Updated February 2024

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Introduction from the Managing Director

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Employees are expected to report concerns and management are expected to act upon them.

Organisation's Structure

The Sandown Group is a franchised Mercedes-Benz and smart dealer and retails and repairs Mercedes Benz and smart cars. In addition, the group retails vehicle parts and accessories as part of the Mercedes Benz UK network. The Sandown Group trades through two entities, namely, Sandown Surrey and Hampshire Limited and Sandown Dorset and Wiltshire Limited. The group has its head office in the UK and all trading outlets are in the UK. The group has an annual turnover in excess of £36m.

Our Business

Sandown is a privately owned Mercedes-Benz group operating across eight sites. The group is responsible for 10 Retail and Service centres and employs approximately 550 people.

Our Supply Chains

Our supply chains include the sourcing of vehicles and parts relating to the sale and repair of new and used Mercedes and smart cars.

The automotive supply chain is one of the most complicated of any industry. There are often six to ten levels of suppliers between an automaker and the source of raw materials that enter the manufacturing process. The breadth, depth and interconnectedness of the automotive supply chain

make it challenging to effectively manage business and sustainability issues. Respecting human rights and environmental issues in the supply chain is ultimately our suppliers' responsibility. As customers, however, we play an active role in supplier development and have adopted various means to clearly communicate our expectations to our suppliers.

Our Policy on Human Slavery and Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of business or in our supply chains. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to prevent slavery and human trafficking 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 employ a professional Human Resources team who vet all applicants thoroughly and work closely with any agencies and 3rd parties who provide us with labour.
- Where possible we build long standing relationships with our suppliers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We expect each entity in the chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the chain, ultimately to component manufacturers.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

We have embraced the Stronger Together Programme across our sites, and applaud the work being done to reduce forced labour and human trafficking in the UK. Our Human Resources team have been trained in the exploitation of human labour and we have provided training to key personnel within the business. All employees and agency staff have received information regarding the Stronger Together principles and have mechanisms to increase the visibility of issues, for example through confidentially contacting the Human Resources Team 01202 644 381.

Risk Assessment

We regularly assess risk related to human trafficking and forced labour associated with our supply base. Our preliminary assessment is based upon the commodity or service purchased, supplier quality performance, business location and the nature of the business transaction. The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;

Sandown classifies its suppliers as follows: 1) Goods for resale, 2) Direct materials, 3) Indirect purchases; consumables and services, e.g. cleaning and valeting.

Internal processes and procedures allow us to clearly identify high risk supply chains and/or areas within our supply chains where there is an increased risk of modern slavery. We have as such identified that one of the main areas of exposure has been identified as the outsourcing of valeting services. As a result, we have included taking positive steps to ensure that our contract valeting companies are

adhering to all our supplier's principles, included their management on our internal training program and have provided them with clear and concise directions with regards to the recruitment and assessment of their personnel.

Supplier Adherence to our Values

We expect all those in our supply chain and contractors comply with our values.

The Directors and Senior Managers are responsible for compliance in their respective departments and for their supplier relationships.

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 provide training to each and every one of our employees. All new employees undertake the training within the first month of employment. All Directors have been briefed on **the subject**.

Our Effectiveness in Combating Slavery and Human Trafficking:

We use the following key performance indicators (KPIs) 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:

- Completion of site audits by Senior Managers.
- Use of labour monitoring and payroll systems.
- Suppliers Compliance Principles are issued.
- All recruiters are briefed on issues around third party labour exploitation and have signed appropriate Compliance Principles.
- Ensure that labour sourcing, recruitment and placement processes are under the control of trusted staff members and are not open to corruption.
- Do not use any individual or organisation to source and supply workers without being absolutely sure that workers are not being charged a work finding fee.
- Encourage workers to report cases of hidden third party labour exploitation and investigate and act on reports appropriately.

This statement constitutes the Sandown Group's Slavery and Human Trafficking statement for the current financial year.

Jo Michael

Group Human Resources Director