SLAVERY AND HUMAN TRAFFICKING STATEMENT

Of Lipscomb Holdings Ltd and its subsidiary:

Lipscomb Cars Ltd

In accordance with the Modern Slavery Act 2015 (MSA), this Statement provides the measures which we take to prevent slavery and human trafficking occurring in our business and supply chains. Lipscomb Holdings Ltd and its subsidiary company are fully committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chains and requires the same standards on its suppliers.

This Statement will be made available on our website to all who engage with us whether in employment or in business so that those parties may acquaint themselves with the contents.

STRUCTURE AND SUPPLY CHAIN

Our principal activities concern the sale and servicing of new and used automobiles from three locations in Kent. Our Group directly employs more than 115 staff.

Our functions across our businesses are very broad. In addition to vehicle sales our aftercare includes the servicing and repair of vehicles for both businesses and the general public. We sell parts and accessories, conduct MOT testing and accident repairs.

POLICIES ON MODERN SLAVERY

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 are committed to acting ethically and with high 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 which include:

- **Whistleblowing policy - We** encourage all of our employees, clients and other business partners to report any concerns related to the activities of the organisation or its employees and contractors. The organisation's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.
- **Employee code of conduct - Our** code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.

DUE DILIGENCE PROCESSES

From a supply chain perspective, we ensure our suppliers commit to our company values by obtaining confirmation from them that their business practices and supply chains are in accordance with the MSA. In procurement, this is evaluated as part of any tender process, we monitor compliance of these suppliers with suitable levels of due diligence according to the level of risk which we assess for the potential of human trafficking and/or modern slavery. However, due to the complexity of the global supply chains in the automotive industry we are unable to check every business relationship and avenue between each tier.

Any instances of non-compliance alleged modern slavery or human trafficking of which we are made aware of will be assessed on a case-by-case basis. We will quickly and thoroughly investigate any claim or indication that any area of our business or supply chain is engaging in human trafficking or slave labour. Any such claim would be reported to senior management as appropriate. The board of directors will be informed of the issue including the findings and outcome of the investigation.

Areas of risk

Cleaning and valet services face a higher risk of modern slavery due to similar factors as those in the construction industry. These may include high staff turnover and more reliance on migrant workers. Presently, we utilise external suppliers only who have committed to our policies.

Measuring Effectiveness

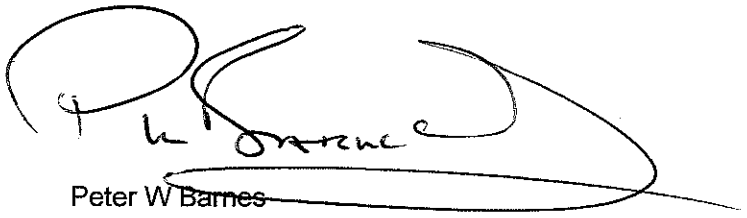
We review our supply chains to identify categories that potentially carry risk and seek to monitor through both our staff and management teams. We encourage input from all Employees and hold regular Director meetings to ensure any concerns are raised and recommended actions taken.

Training For Staff

To ensure a high level of understanding the company have an employee code of conduct, this is highlighted to all staff and a file made available for training and induction purposes. We also have an appropriate whistleblowing procedure for staff to raise any concerns. Directors and the management team have also undertaken distance learning courses 'Understanding Equality and Diversity'.

This statement is made pursuant to section54(1) of the Modern Slavery Act 2-15 and constitutes our Groups slavery and human trafficking statement for the financial year ending 31 December 2022 and has been approved by the Board of Directors on the date of the signature below.

Signed



Peter W Barnes

Managing Director

Dated: March 1st 2023