

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT - MODERN SLAVERY ACT 2015

We The Board of Directors have implemented a zero-tolerance policy to modern day slavery and human trafficking from our supply chain and within our own business. This policy applies to all persons working for the company at all levels.

TJAM Holdings Ltd and its wholly owned subsidiaries TJA Motors Ltd and M53 Motors Ltd are committed to preventing acts of modern-day slavery and human trafficking. This is from occurring from both within its business and supply chain and imposes the same high standards on its suppliers.

Due Diligence

The Group requests copies of all Anti-Slavery Statements (for the 2015 Act) from all their supply companies that they consider might be in the high-risk element.

Our Policies on Slavery and Human Trafficking

Our group is 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 to our knowledge anywhere in our supply chains.

Employee Code of Conduct Policy

Our employee code of conduct makes it perfectly clear to all our employees what is regarded as acceptable behaviour from them when representing the Group. We always encourage our employees to act in an honest, moral, and ethical manner always with their fellow employees and when controlling our supply chain relationships.

Whistleblowing Policy

The Group encourages all our employees to report any concerns they may have in connection with any breach of our zero-tolerance to modern day slavery or human trafficking without fear of any form of retribution, victimisation, or detriment.

Structure

We operate within the Automotive Industry in the UK and the group employs circa sixty-three colleagues across the two sites. It is involved in the sale of new and used vehicles. We also offer aftercare of vehicles such as servicing and replacement parts supply and offers finance products to consumer and corporate customers to assist with the funding of vehicle purchases.

To provide high levels of service to our customers we work with a range of suppliers. We consider the most relevant of these to be where it has a contractual relationship such as but not limited to its vehicle manufacturer, replacement parts suppliers, cleaning contractors, workwear suppliers and marketing support organisations.

The group is satisfied there is no evidence of any act of modern-day slavery or human trafficking within its organisation.

To find out more about the nature of our business please visit groupm53.co.uk.

Risk and Compliance

The Group does not consider that we operate in an excessively high-risk sector.

However, we view the following areas of our supply chain to be at a higher risk in modern day slavery and human trafficking:

- Industrial cleaning contractors.
- Vehicle valeting contractors.
- Workwear providers.
- PPE Providers

Having identified the areas of our supply chain as a potential area of concern they are closely monitored, and assurances sought from them that they fully support the anti-slavery and human trafficking zero-tolerance approach adopted by the Group. We are committed to ensuring that all our suppliers are aware and comply with the 2015 Act and will encourage our suppliers to monitor compliance with the Act within their own supply chain.

To protect against slavery, the Group ensures that our business complies with the national minimum wage legislation as periodically reviewed and demands the same of its suppliers.

As part of our risk assessment processes, we will consider whether circumstances dictate that we carry our audits of suppliers for their compliance with our anti-slavery and human trafficking policy and if any are found in breach of our policy or the Act they may face having their contracts terminated without notice.

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, workwear providers etc.)**

Recruitment Policy

Our recruitment policies ensure employees establish their right to work in the UK and satisfy minimum age requirements and our internal human resources policies ensure working practices are monitored for ongoing compliance with current legislation.

Training

Training of all staff on how to identify and report potential breaches of the company's anti-slavery and human trafficking policy will be undertaken on a regular basis. Employees will be taught the benefits of stringent measures to tackle slavery and human trafficking as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Effectiveness in Combating Slavery and Human Trafficking

The Group 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 areas of our business or supply chains. We intend to continue to keep this under review.

Approval

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes M53 Motors Limited slavery and human trafficking statement for the financial year ending 31st December 2021.

This statement covers the following Companies: TJAM Holdings, Company Number 12499437 and its subsidiary companies TJA Motors Ltd, Company Number 4343308, M53 Motors Ltd, trading as M53 Ford, Company Number 1840005 and

During this financial year, we recorded no reports of suspected breaches of the 2015 Modern Slavery Act.

Last Reviewed 14/05/2024.

This statement was approved by the Board on the 15/05/2024.

TJAM Holdings Ltd and M53 Motors Ltd.