T W WHITE & SONS: MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement sets out the steps that T W White & Sons Holdings Limited and our subsidiaries ("T W White & Sons") have taken to prevent modern slavery and human trafficking occurring within any part of our businesses or supply chain during the 2021/2023 financial year and is made pursuant to s54 of the Modern Slavery Act 2015.

Introduction

Modern slavery is a crime and a gross violation of fundamental human rights. Modern slavery can take many forms and encompasses slavery, servitude, human trafficking and forced labour. All of these have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We all have a responsibility to be alert to the risks in our business. T W White & Sons have a zero-tolerance approach to modern slavery and are fully committed to preventing any form of slavery or human trafficking or forced labour. All staff are expected to report concerns and management are expected to act upon them.

Structure, Business and Supply Chains

T W White & Sons are a motor group operating from 6 locations specialising in the sale, lease, service and repair of new and used vehicles and providing of parts. T W White & Sons (Holdings) Limited is the parent company of T.W. White and Sons. We are based in the South East of England and represent Mazda, Kia, Hyundai, Suzuki. Our annual turnover is in excess of £48m.

T W White & Sons use a wide variety of national, local and international suppliers to source goods, services and equipment for the operation of its business. In particular, we work principally with the vehicle manufacturers from whom we obtain our principal products: motor vehicles and aftersales parts. Also included in these supply chains are auction houses, individuals trading in and supplying used vehicles, professional support service suppliers, suppliers of consumables and cleaning and valet service providers. We also provide services including Finance and the sale of General Insurance Products and we are authorised by the Financial Conduct Authority (FCA) to do so. The Directors recognise that the nature of our supply chain makes checking for illegal activity challenging, but there are a number of checks and safeguards we have put in place that reduce the risk of slavery and human trafficking occurring in our supply chain, as explained below.

Our Anti-Slavery and Human Trafficking Policy

T W WHITE & SONS ANTI-SLAVERY POLICY

T W White & Sons are committed to a culture of acting ethically with good governance for good business. We hold a set of core values which reflect our relationship with our principle stakeholder: customers, staff, suppliers and manufacturers. We are committed to ensuring there is no exploitation of individuals in any form, and more particularly by the offences under the Modern Slavery Act 2015. We demand the same of all who work for us or with us. Our Anti-Slavery Policy 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 in our supply chains.

We have an absolute zero tolerance attitude to modern slavery.

Modern Slavery risk and our due diligence process in relation to Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we manage all of our retail dealerships and aftersales centres in line with best practice UK automotive standards. Our premises are limited to South East England, allowing us to have firm control on our activities and being able to adequately oversee them. Where possible we have long standing relationships with our local suppliers and make clear our expectations of business behaviour. We recognise that we are not able to directly control the conduct of individuals and organisations within our national and international supply chains, but our point contact is the represented personnel of our UK based manufacturer partners and we expect all these entities to have suitable anti-slavery and human trafficking policies and processes.

To underpin our compliance with practical steps we:

1. Continue to conduct risk assessments and internal audits to determine which parts of our business are most at risk of modern slavery.

2. Engage with all our suppliers to convey to them our anti-slavery policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their business. We ask all suppliers to provide confirmation that they have read and understood our Policy and will adhere to it.

3. Where appropriate, as informed by our risk assessment, seek to introduce a supplier pre-screening (for example as part of our tender process) and self reporting for our suppliers on safeguarding controls

4. Protect Whistle-blowers.

Measuring Effectiveness

T W White & Sons have an absolute zero-tolerance to slavery and human trafficking. To this extent, we have not adopted any performance indicators as any instance of modern slavery or human trafficking by a supplier would be considered to be a breach of our Policy.

Whilst the directors believe that T W White & Sons is generally at low risk of exposure to modern slavery and human trafficking, our internal risk assessments identify which of our suppliers and sub-contractors are potentially more exposed than others, and to which further diligence will be applied. All franchise managers and general managers and managers are responsible for compliance in their respective areas of responsibility.

Training and Awareness of our Staff

To ensure a high level of understanding the risks of modern slavery and human trafficking in our supply chains we will provide continuous training to relevant members of T W White & Sons staff. All staff members have an obligation to familiarise themselves with and adhere to our Policy and procedures to help in the identification and prevention of modern slavery. We also require our business partners to provide training to their staff and suppliers.

Review

Following its initial adoption, this Anti-Slavery and Human Trafficking policy will be reviewed by the Company's Board of Directors annually and may be amended from time to time.

Statement reviewed and approved by Neil White, Managing Director. July 2022