BLACKCIRCLES.COM LIMITED

MODERN SLAVERY ACT 2015

ORGANISATION STRUCTURE

Blackcircles is a leading online tyre retailer distributing to consumers across the UK.

Blackcircles is a part of the Michelin Group, and our ultimate parent company is Compagnie Générale des Établissements Michelin. Headquartered in Clermont-Ferrand, France, the Michelin Group has a commercial presence in 170 countries, employs approximately 130,000 people in 63 countries worldwide and operates 128 production sites.

Michelin is an internationally active group and globally leading tyre manufacturer, Michelin is aware of the consequences of its actions and its responsibility for the people who work for and with it. We believe that respecting human rights and contributing to the application of these rights is not only critical to the sustainable operation of our business, but also the right thing to do.

Michelin continues to place the prevention of modern slavery and human trafficking as a high priority within the organisation.

OUR SUPPLY CHAIN

Blackcircles' supply chain primarily involves the procurement and fitting of tyres within a network of independent garages across the UK.

OUR POLICIES

We are committed to implementing and enforcing effective systems and controls to ensure that neither modern slavery nor human trafficking exist in our supply chain or in any part of our business. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships.

One of the cornerstones of our company values and culture, is 'respect' and is fundamental to our approach to business, our suppliers, employees and customers.

We remain committed to further developing our compliance programme to ensure that our supply chain and employees are fully engaged and involved in this compliance programme. We also have a zero-tolerance approach to modern slavery and human trafficking with partners who fail to comply with the requirements of the act.

We expect the same standard and behaviour from all our suppliers. The Blackcircles conditions of purchase, provide current suppliers with information about the requirements and expectations regarding human rights, health and safety, environment and business ethics. The Michelin Group Code of Ethics and Human Rights policy are also contained within Blackcircles conditions of purchase and available for all stakeholders to view on our website.

DUE DILIGENCE

All new supply partners will be risk assessed to allow us to assess the appropriateness of the business, from a prevention of modern slavery perspective, and to demonstrate that they meet our values and principles in their day-to-day operation.

RISK ASSESSMENT

We endeavour to:

- Identify, assess and monitor potential risk areas in our supply chain
- Mitigate the risk of slavery and human trafficking occurring in our supply chain while
- Protecting whistle blowers (see below) by providing clear guidance on our policies and through the provision of an anonymous telephone support line to report any concerns
- Have identified an ethics coordinator who is part of a wider Michelin Group ethics committee

Blackcircles.com is committed to increasing its efforts in raising awareness on modern slavery and takes a zero tolerance approach to slavery and human trafficking throughout its business operations.

KPI's, Audit and Ongoing Monitoring

To measure the effectiveness of the steps we have taken, we have established a steering committee to monitor our KPI's and seek to continue evolving and developing our policies and plans. The steering committee is led by senior management and meets quarterly.

We have an ongoing program of appraisal with all existing supply partners that is revisited annually.

Our standard Purchasing Conditions allow Blackcircles the right to audit suppliers in relation to ethics and compliance.

TRAINING

The Company has provided all colleagues with access to a training program with courses on identifying modern slavery, how it can manifest in our supply chain and escalating any concerns to key stakeholders. The training program was developed to work hand in hand with our clearly defined policies and procedures and the launch of the whistle blowers contact line.

The Governance steering group is continuing to review what further awareness and training is required amongst the rest of the workforce on modern slavery and human trafficking in 2025/2026, in particular what format this needs to be provided to ensure that the topic is not only viewed but really embedded as part of the DNA of the organisation.

WHISTLEBLOWING

Respect is one of the Blackcircles.com core values – caring for every person inside and outside of our organisation, to earn their trust through our integrity. One way we aim to stay true to this core value is to actively encourage a 'speak up' culture, inside and outside of the organisation.

We maintain an anonymous 'whistleblowing' line with an independent third party, known as our 'Ethics Line'. All employees are advised of this facility and third parties, such as our customers and suppliers, can access the facility https://ethique.michelin.com/en/

We also have a robust procedure to ensure that all incidents reported are handled promptly and with the level of expertise required to safeguard the integrity of the Ethics Line. Confidentiality and protection of whistle blowers is specifically covered in our Michelin Code of Ethics.

VIOLATIONS

Blackcircles.com shall take disciplinary action against any employee found to be involved in breaking the law in relation to child labour, forced labour, slavery and human trafficking.

This statement by our board 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 31st December 2024.

G Cole

Graeme Cole

Director

Date Statement Approved by Board: 19 June 2025