

Modern Slavery Statement

(for financial year 1 January 2025 – 31 December 2025)

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Vines Ltd during the financial year 1 January 2025 to 31 December 2025 to prevent modern slavery and human trafficking within our business operations and supply chain.

Modern slavery encompasses slavery, servitude, forced and compulsory labour, and human trafficking. Vines Ltd maintains a zero-tolerance approach to modern slavery and is committed to acting ethically, with integrity and transparency in all business dealings.

Organisation, Structure and Supply Chains

Vines Ltd is a UK-based motor retail group operating in the South East of England, with three sites retailing and maintaining BMW and MINI vehicles. We employ approximately 300 colleagues and generate annual revenues in excess of £200 million.

Our supply chain includes a range of UK-based suppliers supporting our operations. Key partners include BMW UK and MINI UK, alongside a network of suppliers providing services such as:

- Vehicle valeting
- Cleaning services
- Facilities management and building contractors
- Temporary labour agencies

We recognise that certain sectors, particularly those involving contracted labour, may present a higher inherent risk of modern slavery.

Governance and Responsibility

Responsibility for overseeing our approach to modern slavery sits with the Senior Leadership Team, with regular updates provided through compliance reporting. This statement has been approved by the Managing Director and is signed by the Group Managing Director.

Policies

We maintain a framework of policies that support ethical business conduct and mitigate the risk of modern slavery, including:

- Modern Slavery Policy
- Anti-Bribery and Corruption Policy

- Whistleblowing and Open Door Policy
- Equal Opportunities Policy
- Code of Conduct
- Employee Privacy Policy

These policies are reviewed periodically and are available to all employees.

Due diligence

When considering taking on new suppliers, and reviews of our existing suppliers Vines will undertake the following due diligence, reviews and actions;

- Assessing our supply chain to evaluate particular product, service or geographical risks of modern slavery and human trafficking
- Creating a risk profile for non –manufacturers suppliers.
- Assessing/Evaluating the modern slavery and human trafficking risks of each new supplier.
- Modern Slavery will form part of the Compliance section of our monthly Senior Management meeting.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Risk Assessment

We recognise that while our core operations are UK-based and within the regulated automotive sector, risks may arise within indirect supply chains, particularly where temporary or outsourced labour is used.

Our risk approach focuses on:

- Identifying higher-risk supplier categories
- Prioritising review activity accordingly
- Leveraging the robust due diligence processes of key manufacturer partners such as the BMW Group

Effectiveness and Key Actions

We continue to take the following steps with the aim of ensuring that modern slavery and human trafficking are not taking place in any part of our business or our supply chains:

- A review of our employment terms and conditions and recruitment policy.
- Training on modern slavery.

- Reviewing existing supply chains and ensuring any new suppliers comply with the Modern Slavery Act.

Training

We continue to build awareness of modern slavery risks across the business. Key actions include:

- Providing training and guidance to relevant staff involved in procurement and people management
- Ensuring senior leaders are briefed on modern slavery risks and responsibilities
- Promoting use of whistleblowing channels for raising concerns

This statement has been approved by the Board of Directors of Vines Ltd and signed on its behalf by:



Sean Kelly

Group Managing Director

Dated: 7th May 2026