

## Modern Slavery Act Statement

At Ocean Automotive we are fully committed to conducting business with honesty and integrity and in treating all people with respect and dignity. We are also committed to complying with applicable laws, regulations and treaties and to protecting and promoting human rights. We are implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our own business or within any of our supply chains.

We also expect the same high standards from our suppliers, contractors and other business partners and in turn expect that their suppliers also hold their own suppliers to the same standards.

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and we're committed to knowing all we can about where there are risks and to taking appropriate action.

### Organisation Structure

Ocean Automotive (Holdings) Limited is the parent company of three trading subsidiaries who operate premium franchise car dealerships. We retail both new and used cars, along with manufacturer approved servicing, repairs and parts. We are based in the UK and have over 280 employees.

### Our Supply Chain

Our supply chain includes the sourcing of vehicles, parts and other products relating to the sale and repair of new and used cars.

There are often numerous suppliers between a vehicle manufacturer and the source of raw materials that enter the manufacturing process. It is ultimately our suppliers' responsibility to ensure that they fully respect human rights as well as environmental issues. However, as customers we play an active role in ensuring we communicate our expectations to our suppliers.

### Our Policy on Slavery and Human Trafficking

We are committed to, where possible and practical due to the complexity of our supply chains, to ensure that there is no modern slavery or human trafficking in any part of our business and supply chains. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to prevent this. All our employees are encouraged to familiarise themselves with this information and our management team are aware of their responsibilities in relation to them.

### Due Diligence Processes for Slavery and Human Trafficking

In order to identify and mitigate any risk, we have undertaken the following initiatives:-

- Our Human Resources team vet all applicants thoroughly and work closely with any agencies and third parties who provide us with labour. We have great control over employment and working conditions and the risk of modern slavery or human trafficking is regarded as low. This is due to the corporate governance processes, policies and procedures which have been implemented.
- We build long standing relationships wherever possible with our suppliers and make our expectations of business behaviour clear and unambiguous.
- For national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We expect each entity in the chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical or possible for us (and every other participant in the chain) to have a direct relationship with all links in the chain.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

## Supplier Adherence to our Values

We expect all those in our supply chain and contractors to comply with our values and to act with integrity and ethically at all times.

The Directors and Senior Managers are responsible for compliance in their respective departments and for their supplier relationships in line with our Anti-slavery Policy.

## Training and Capacity Building

To ensure a high level of understanding of the risks within our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject and are aware of their responsibilities. Our employees have a process in place to report any concerns immediately to their Line Manager to investigate should they have any concerns of any risk of slavery or human trafficking taking place.

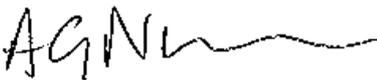
## Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Identify any areas of high risk within our supply chain and identify how to mitigate against these
- Completion of site audits by Senior Managers and ongoing Corporate Governance
- Use of labour monitoring and payroll systems to determine compliance with the Living/Minimum wage rates and Working Time Regulations
- Contractual agreements contain a clear reference to obligations within the supply chain.
- All recruiters are briefed on issues around third party labour exploitation and have signed appropriate contractual agreements
- Ensure that labour sourcing, recruitment and placement processes are under the control of trusted staff members and are not open to corruption.
- Do not use any individual or organisation to source and supply workers without being absolutely sure that workers are not being charged a work finding fee.
- Encourage workers to report cases of hidden third party labour exploitation and investigate and act on reports appropriately.

This statement constitutes the Ocean Automotive Group's slavery and human trafficking statement for the current financial year. **(pursuant to section 54 of the UK Modern Slavery Act 2015)**

This statement, made by Ocean Automotive (Holdings) Limited on behalf of all companies within the Ocean Automotive Group, sets out the steps taken to prevent modern slavery and human trafficking across the business and our supply chains for the financial year ending 31<sup>st</sup> December 2019.



**Gail Ninnim**  
Commercial Director