

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Introduction

This statement sets out Vision Automotive (UK) Group Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2018-19.

As part of the automotive industry, the Company recognises that its management and employees has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Vision Automotive Group Ltd:

- Vision Automotive Group comprises of authorised Skoda dealerships (Rainworth Skoda, Mansfield and Bickerton Skoda, Sheffield, and a used car centre, Rainworth Select, Mansfield) selling products to both retail customers and Business to Business
- The company operates in partnership with Skoda UK as an authorised franchisee supplying the vehicles, parts and accessories sold through the dealerships. Additional services are provided including Finance and Insurance products and we are fully authorised by the Financial Conduct Authority (FCA) to do so.

Countries of operation and supply

The Company currently operates in the following countries:

- The company supplies new and used vehicles across the UK with its Head Office based at Mansfield and its retail sites based in Mansfield (2 sites) and Sheffield (1 site).

Relevant policies

The Company operates a range of policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** - The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** - The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier code of conduct** - The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations will lead to the termination of the business relationship.

Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain;
- conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- invoking sanctions against suppliers that seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- requiring all staff working in supply chain management and HR professionals to have completed training on modern slavery by 1st June 2019;
- developing a system for supply chain verification which is expected to be in place by 1st June 2019, whereby the Company evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains completed by 1st April 2019, whereby the Company evaluates all existing suppliers.

Awareness-raising programme

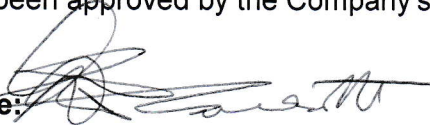
The Company is raising awareness of modern slavery issues to staff explaining;

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Company; and
- what external help is available, for example through the Modern Slavery Helpline.

Board approval

This statement has been approved by the Company's board of directors, who will review and update it annually.

Director's signature:



Director's name: S. BECKETT

Date: 15/3/2019