

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

For the purpose of this document the following companies, which are all associated with each other, will be referred to as “The Halliwell Jones Group”.

Halliwell Jones Ltd, Halliwell Jones (Chester) Ltd, Halliwell Jones (Warrington) Ltd, Halliwell Jones (North Wales) Ltd, Halliwell Jones (Wilmslow) Ltd and Halliwell Jones (Wilmslow) Bodyshop Ltd.

The Halliwell Jones Group is fully committed to understanding the risks of modern slavery. In accordance with the Modern Slavery Act 2015 this statement outlines the steps taken by the Halliwell Jones Group to prevent slavery and human trafficking from occurring in our company or supply chains.

The Halliwell Jones Group operates BMW and MINI franchises across the North West of England and Wales. The business includes selling and servicing BMW and MINI vehicles as well as operating 3 large Bodyshops. The Halliwell Jones Group maintains relationships with many different organisations in our supply chains. The Halliwell Jones Group has centres in Warrington, Chester, Southport, North Wales and Wilmslow and employs approximately 600 people.

The functions across the Halliwell Jones Group are:

- new and used vehicle sales
- facilitating financing vehicles and providing insurance products
- vehicle servicing, repair and MOT testing
- parts and accessories sales
- corporate sales
- carrying out accident repairs
- head Office support functions including Accounts, Marketing, Human Resources

Our Supply chains

The automotive supply chain is one of the most complicated of any industry. There are often six to ten levels of suppliers between the car manufacturer and the source of raw materials that enter the manufacturing process.

The Halliwell Jones Group has a zero tolerance approach to slavery and human trafficking and is committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of the business. The Halliwell Jones Group expects all our suppliers to be committed to preventing slavery and human trafficking.

This Anti-Slavery Statement underpins the Halliwell Jones Group’s anti-slavery and human trafficking policy and reflects our commitment to put in place systems and controls which ensure slavery and human trafficking is not taking place anywhere in the business or related supply chains.

Due Diligence

The Halliwell Jones Group sources and sells products and parts from a broad range of national and international suppliers. Due to the breadth of our businesses and supply chains The Halliwell Jones Group is not in a position to check every business relationship and avenue. The principal areas in which there is a risk of human trafficking and slavery are those related to our supply chains. The Halliwell Jones Group takes a risk based approach in assessing our potential exposure to slavery and human trafficking in our supply chains

Although the Halliwell Jones Group recognises our statutory obligation to take practical steps to prevent modern slavery and human trafficking from occurring in our supply chains, the Halliwell Jones Group is not able to control the conduct of individuals and organisations in our supply chains.

The practical steps which the Halliwell Jones Group have taken are as follows:

- Ensure all Halliwell Jones Group employees have the right to work in the UK by carrying out right to work checks for all employees as part of the recruitment process.
- The Anti Slavery and Human Trafficking Policy is included in the company induction.

The practical steps which the Halliwell Jones Group intend to take are as follows:

- Conduct risk assessments to determine which parts of the business and which suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- Engage with those suppliers identified as potentially at risk in order to communicate to them our Anti-Slavery Policy and to understand what measures they have taken to ensure modern slavery is not occurring in their businesses.
- Ensure all business activity complies with minimum wage legislation and to ensure that this requirement is met by all our contractors who are identified by the Halliwell Jones Group as potentially at risk.
- to ensure that the requirement, to only employ staff with the right to work in the UK, is met by all our UK contractors who are identified by the Halliwell Jones Group as potentially at risk

In the event the Halliwell Jones Group become aware of any instances of non-compliance from our suppliers, each instance will be investigated and assessed by the Halliwell Jones Group on a case by case basis. Remedial action will be taken appropriate to the circumstances of each case. The Halliwell Jones Group will temporarily suspend our business (to the extent permitted under contract or by law) with any supplier who it suspects of non-compliance. If a supplier continually fails to comply, then the ultimate sanction will be for the

Halliwell Jones Group to cease to trade with that supplier (to the extent as permitted under contract or by law).

Training

This statement and our Anti-Slavery Policy has been communicated to all employees and is included in the Halliwell Jones Group induction, to ensure a high level of understanding of the company's zero tolerance approach to modern slavery and human trafficking in our supply chains and our business and our commitment to preventing modern slavery and human trafficking from occurring in our business and supply chains.

The Halliwell Jones Group operates a number of policies and procedures which promote and enforce the company's zero tolerance approach in order to reduce the risk of slavery and human trafficking from occurring. These policies and procedures are reviewed regularly and include:

- Modern Slavery Policy
- Equal Opportunities Policy
- Recruitment Policy
- Grievance Policy
- Whistleblowing Policy
- Anti-corruption and bribery Policy
- Anti-harassment and Bullying Policy

Statement Publication and Review

The Halliwell Jones Group Anti-Slavery and Human Trafficking Statement is posted on the Halliwell Jones Group website. The Halliwell Jones Group annual financial year end date is 31st December. The Anti-Slavery and Human Trafficking Statement will be reviewed by the Company's Board of Directors on an annual basis and will be published no later than the following 31st March.

Approved on behalf of the Board of Directors; Glyn Howes, Finance Director