



MODERN SLAVERY STATEMENT

Slavery and Human Trafficking Statement for Richmond Cars Limited for the financial year ending 31 March 2019.

Introduction from the Managing Director and Operations Director

The UK Modern Slavery Act 2015 (the 'Act') requires business to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. We are fully committed to playing our part in eradicating modern slavery. We firmly advocate for transparency and collaboration to eliminate the risks of modern slavery.

Organisation Structure

We are primarily an automotive retailer and a provider of servicing and parts. Richmond Cars Ltd has its head office in the UK (Portsmouth) and all trading outlets are in the UK. The group has an annual turnover in excess of £128m.

Our Business

Our business is organised across the different brands we represent – Hyundai, Citroen, DS and MG.

Our Supply Chain

Our supply chains principally include the supply of vehicles and parts from the manufacturers we represent.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We provide all employees with full details of this statement, along with our Code of Conduct and Whistle-blowing Policy. All employees are encouraged to familiarise themselves with this information at induction and at regular intervals via our employee handbook. Our management structure are familiar with these policies and are aware of their responsibilities in relation to them.

Due Diligence Process for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk –

- We manage retail dealerships in-line with best practice UK automotive standards;
- The geographical scope of our premises are limited to the Southern England allowing us to have firm control on our activities and being able adequately to oversee them;
- Where possible we build long standing relationships with local suppliers and, make clear our expectations of business behaviour;
- With regards to any national or international supply chains, our point of contact is the represented personnel of our UK-based manufacturer partners 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 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.

Our Policies on Slavery and Human Trafficking

Policies:

Richmond Cars Ltd operates a number of internal policies and procedures which aim to ensure we conduct our business in a legally compliant and ethical manner. The 2018 release of the Employee Handbook contains the following policies:

- **Whistleblowing policy** – makes clear to employees our commitment to conducting business with honesty and integrity and its expectation on all staff to report all concerns, including those related to slavery and human trafficking, and its commitment that such disclosures can be made without fear of retaliation.
- **Equal Opportunities Policy** – makes clear to employees our approach to equal opportunities, conduct at work and the avoidance of discrimination at work.
- **Anti-Harassment and Bullying** – makes clear to employees our commitment that their working environment will be free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.

Each such policy explains how employees can identify and raise concerns.

Richmond Cars Ltd operates a robust recruitment process that includes eligibility to work in the UK checks and references for all recruits. Only reputable employment agencies are used as a recruitment source.

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- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- We will quickly and thoroughly investigate any claim or indication that any area of our business, or its associated supply chain, is engaging in human trafficking or slave labour.



Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Dealer Principals are responsible for compliance in their respective dealerships and for their supplier relationships.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

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 high risk within our supply chain and obtain compliance declarations on a biennial basis;
- Use of labour monitoring and payroll systems to determine compliance with Living/Minimum wage rates and Working Time Regulations; and

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the financial year detailed above.

Approval for this statement

This statement was approved by the Board of Directors on 3rd September 2018.

A handwritten signature in black ink, appearing to read 'Sam Nobes', with a large, stylized 'S' and 'N'.

Sam Nobes

Operations Director
Richmond Motor Group