

Modern Slavery Statement

Introduction

This statement sets out JKC Specialist Cars 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 1 January 2018 to 31 December 2018.

As part of motor industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation 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

JKC is family owned BMW & MINI vehicle retailer established over 40 years ago. Over the past few years we have gained recognition as 'BMW Retailer of the Year' and 'BMW Customer Champion'.

Our success has been built by every team member working together and contributing to our one team ethos. We strive to deliver an exceptional customer experience; our colleagues are highly trained, enthusiastic, knowledgeable and driven to deliver our fundamental commitment to our customers; we strive to get it right first time and make each and every interaction special.

Our ultimate aim is to be considered the best company to work for in the industry and the best company to do business with.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Describe who is responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** Explain the process and broad organisational responsibility for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** List individuals or departments responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking, and explain their specific role.
- **Training:** Describe broadly the training that has taken place either directly within the company, or with suppliers and others, to better understand and respond to the identified slavery and human trafficking risks.

Relevant policies

The organisation operates the following 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 organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation 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 organisation 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. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Corporate Social Responsibility** – We ensure our business monitors its compliance with the law and industry standards, we often go above and beyond our obligations particularly in terms of the effects on the environment and impact in social welfare. JKC'S sustainable procurement practices consider the impact on the environment, economic and social factors as well as price and quality, our sustainability efforts are also aimed at promoting positive benefits and fairness for suppliers, employees, guests and all stakeholders

Due diligence

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

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- 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.

Training

The organisation requires all staff within the organisation to complete training on modern slavery.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating a series of emails to staff.

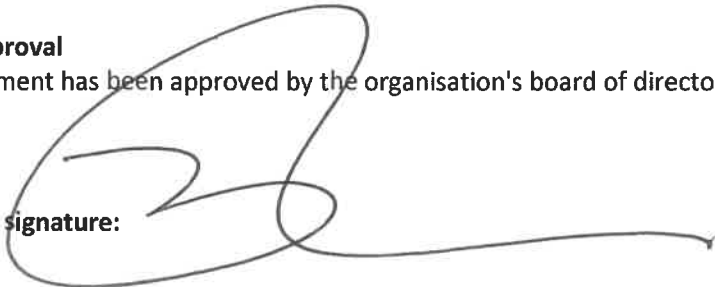
The emails explain to staff:

- 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 organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Board approval

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

Director's signature:



Director's name:

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