



Modern Slavery Statement

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Vines Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Vines Ltd has a zero tolerance to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain. This statement relates to actions and activities during the financial year 1 January 2018 – 31 December 2018.

Organisation, Structure and Supply Chains

We are a prestige motor UK group based in the South East of England, with three centres that retail and maintain motor car and bikes. Vines Ltd employs approximately 350 employees. The Group has an annual turnover of approximately £190 million.

Our supply chains include a variety of suppliers to source goods, services and equipment for the operation of its businesses. Our principle suppliers are vehicle manufacturers BMW UK and MINI UK. We also have the below non manufacturer suppliers who we consider to be at higher risk of potential breaches;

- Valeting services;
- Cleaning services
- Building and facilities contractors
- Bodyshop contractors
- Temporary Recruitment agencies

We are in the process of reviewing our supply chain management process to ensure that all those with whom we engage with comply with our values and their legal obligations. We will be seeking confirmation that our suppliers have robust processes in place to ensure that they meet their obligations with regard to anti-slavery and human trafficking laws.

Policies

We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of the business. Our Modern Day Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We have in place a number of Group policies to ensure that we are conducting business in an ethical manner:

- Modern day Slavery policy
- Anti-Bribery Policy
- Whistleblowing and Open Door policy
- Equal Opportunities Policy
- Code of conduct
- Employee Privacy Policy

Due diligence

When considering taking on new suppliers, and reviews of our existing suppliers Vines will undertake the following due diligence, reviews and actions;

- Assessing our supply chain to evaluate particular product, service or geographical risks of modern slavery and human trafficking
- Creating a risk profile for non –manufacturers suppliers.
- Assessing/Evaluating the modern slavery and human trafficking risks of each new supplier.
- Modern Slavery will form part of the Compliance section of our monthly Senior Management meeting.
- 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.



Risk Assessment

We do not consider that we operate in a high risk sector or location. BMW UK and MINI UK are our main suppliers, we are aware that the BMW Group has a robust and documented approach to ensuring that they meet all requirements of the Modern Slavery Act and also their wider social responsibilities.

Performance indicators

We continue to take the following steps with the aim of ensuring that modern slavery and human trafficking are not taking place in any part of our business or our supply chains:

- A review of our employment terms and conditions and recruitment policy.
- Staff training on modern slavery.
- Reviewing existing supply chains and ensuring any new suppliers comply with the Modern Slavery Act.

Training

To ensure a high level of understanding of the risk of modern slavery and human trafficking in our supply chain and our business, we provide training to relevant members of staff. The Senior Management have been briefed on the subject.

For and on behalf of Vines Ltd

A handwritten signature in black ink, appearing to read "Sean Kelly", with a horizontal line underneath it.

Sean Kelly
Group Managing Director

Dated: 12th July 2019