

## Modern Slavery Act 2015 Statement

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps Heritage Automotive Holdings Limited has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. It constitutes our slavery and human trafficking statement for the 2018 financial year. This statement also applies to all subsidiary companies, Heritage Automotive Limited, Blade Motor Group Holdings Limited, Blade Motor Cycles Holdings Limited, Blade Motor Group Limited and Blade Motor Cycles Limited.

We recognise the suffering which modern slavery and human trafficking causes. In an increasingly global marketplace, we recognise that all businesses have a responsibility to understand whether modern slavery and human trafficking is taking place within their supply chains and this is a responsibility we take seriously.

### Our organisation

Heritage Automotive Group represents the Audi, Honda, Jaguar, Land Rover, SEAT, Skoda, VW and VW commercial vehicle brands, retailing over 20,000 cars and vans per annum. Also representing the Triumph, Harley Davidson, Honda, Kawasaki, Suzuki, Yamaha, KTM, Indian, Aprilia, Moto Guzzi, Ducati, Piaggio and Vespa motor cycle brands.

We are a privately-owned company, employing over 850 highly skilled, trained and knowledgeable individuals with an ambition to deliver the very highest customer experience.

Heritage Automotive Group operate from a number of locations across the South West of England with a head office based in Salisbury.

Corporate social responsibility is an intrinsic part of our culture and we aim to make a lasting and positive impact on the communities in which we live and work. We expect the same from our suppliers and business partners.

### Our policies on slavery and human trafficking

Modern slavery can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. We cannot tolerate modern slavery in any form and we are working to address this within our business or within our supply chain. We are committed to implementing and enforcing effective systems and controls to ensure this is the case. We comply in full with our obligations under the Modern Slavery Act 2015 to publish an annual statement on the steps we are taking to counter modern slavery in our business and our supply chain. This policy applies to all persons working for us or on our behalf in any capacity, including directors, employees, agency workers, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Our Chief Executive has overall responsibility for this policy and the Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all

levels are responsible for ensuring their staff understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

All directors and employees must read, understand and comply with this policy. Everyone working for Heritage Automotive Holdings Limited is responsible for preventing, detecting and reporting modern slavery if it is encountered. If anyone becomes aware of or suspects that modern slavery is taking place, they must immediately notify our Managing Director. This applies whether or not the suspected slavery involves Heritage Automotive Holdings Limited or one of its third-party suppliers. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

## What we are doing

Our working practices respect and uphold human rights for our employees and contractors.

We take the following steps to identify risks of modern slavery and human trafficking within our business and our supply chain:

As our relationship is with the vehicle manufacturer and not with their supply chain, we look to engage with our suppliers to ensure that they match our high standards and the ethos of the Modern Slavery Act 2015 and filter this message down throughout their own supply chain.

We are committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains and expect the same high standards from all of our contractors, suppliers and other business partners. To this end we will carry out due diligence on all relevant and appropriate suppliers by asking for information on their policies on fair sourcing of goods and services, and employment practices.

We will seek to impose contractual terms on our suppliers asking them to warrant that they and their suppliers are in full compliance with our Anti-Slavery Policy.

## Approval

This statement has been approved by the Directors of Heritage Automotive Holdings Limited



Richard Neulaender  
Chief Executive Officer

17<sup>th</sup> January 2019 (updated 15<sup>th</sup> April 2019)