

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Introduction

This statement sets out the Vindis Group's actions to understand all potential modern slavery risks related to our 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 1st April 2019 – 31st March 2020.

As part of the Motor Industry, the Company recognises that it has a responsibility to take a robust approach to anti-slavery and human trafficking.

The Company 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 and supply chains

Vindis Group is a family owned business that has grown by delivering both a personal and professional service. We have a network of Audi, Bentley, ŠKODA, Volkswagen and Volkswagen Commercial Vehicle retailers, spanning six counties. In 2016, Vindis Group announced the launch of two new Ducati stores to its portfolio and also acquired Milton Keynes SEAT.

In addition, we have two trade parts divisions located in Bishop's Stortford and Cambridge; a Head Office function in Huntingdon; and a large Fleet Centre situated at Alconbury Weald. Whilst we have continued to expand, we have been careful to nurture the core family values our business was founded upon; Cherishing Customers; Valuing Employees and Progressive Leadership.

The Company currently has 22 locations, as detailed below, and operates in Norfolk, Suffolk, Cambridgeshire, Northamptonshire, Bedfordshire, Buckinghamshire and Hertfordshire, England. The Vindis Group's Head Office is based in Huntingdon, Cambridgeshire and has centralised Finance, Human Resources, Marketing, Purchasing and IT functions allowing the application of this statement to be embedded across all Vindis Group businesses consistently.

- F Vindis & Sons (Bedford) Ltd T/A Bedford Audi
- F Vindis & Sons (Bedford) Ltd T/A Bedford Volkswagen
- F Vindis & Sons (Bedford) Ltd T/A Bentley Cambridge
- Vindis Trade Parts Ltd T/A Bishop's Stortford TPS
- F Vindis & Sons (Sawston) Ltd T/A Cambridge Audi
- Vindis Trade Parts Ltd T/A Cambridge TPS
- F Vindis & Sons (Bedford) Ltd T/A Cambridge Volkswagen
- Vindis Developments Ltd T/A Fakenham Volkswagen
- F Vindis & Sons (Bedford) Ltd T/A Ducati Cambridge
- F Vindis & Sons (Bedford) Ltd T/A Ducati Peterborough
- Vindis Developments Ltd T/A Huntingdon Audi
- F Vindis & Sons (St Ives) Ltd T/A Huntingdon Volkswagen
- F Vindis & Sons (Bedford) Ltd T/A Vindis Milton Keynes SEAT
- F Vindis & Sons (Bedford) Ltd T/A Northampton Audi
- F Vindis & Sons (Peterborough) Ltd T/A Peterborough Audi
- F Vindis & Sons (Bedford) Ltd T/A Skoda Bury
- Epic Parts Ltd T/A The TPS National Call Centre
- F Vindis & Sons (Bedford) Ltd T/A Vindis Cambridge Service Centre

- Vindis Group Ltd T/A Vindis Group
- Vindis Group Limited Alconbury PDI Centre T/A Vindis Group Fleet
- F Vindis & Sons (St Ives) Ltd T/A Vindis Van Centre Huntingdon
- F Vindis & Sons (Bedford) Ltd T/A Vindis Van Centre Northampton

Business Risk Assessment

The Vindis Group currently employs circa. 900 team members across the aforementioned regions and is committed to ensuring that slavery and human trafficking is not taking place anywhere in our business or within our supply chain. The group has adequate internal policies in place to ensure modern slavery and human right abuses do not occur in our business by:

- A centralised HR & Payroll function that strives to ensure compliance to all recruitment, induction, training and payroll policies and procedures.
- An independent Grievance and Whistleblowing Procedure ensuring people have a way to raise a concern so that robust investigation(s) can take place.

In addition to this:

- The Vindis Group has identified that although the relevant checks and monitoring methods are in place with our larger contractors/suppliers, this review has highlighted a further opportunity to review our entire supply chain; including those less frequently utilised to produce a centralised, agreed and compliant supplier/contractor list. This will ensure that all contractors and suppliers are compliant with this statement and aligned to our business' values; cherishing customers' valuing employees and progressive leadership.
- This will include a risk rating and mapping exercise of all suppliers and contractors working with the Vindis Group. If the relevant due diligence, or confidence in the suppliers/contractors adherence to our statement, in this regard cannot be produced, agreements will be paused until sufficient documentation/evidence is provided. If the supplier/contractor(s) fails to produce this information upon request, within a reasonable timeframe, the Vindis Group will terminate all agreements with the contractor/supplier.
- Any areas deemed high-risk following the mapping exercise will be detailed and published within the next release of this document on 1st April 2020.

Due to the franchise nature of our business, with the Volkswagen Group, the majority of our supply chain relationships have legal contracts in place with specific policy clauses ensuring compliance to the Modern Slavery Act 2015. All other supplier relationships will be reviewed in accordance with this.

Relevant policies

The Company 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 Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employment Guide** - The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Recruitment/Agency workers policy** - The Company uses only specified, reputable employment agencies to source labour.

Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is;

- requiring all current team members to have completed training on modern slavery by 31st October 2019;
- developing a module within the Induction Programme to ensure all new team members are fully aware of the Modern Slavery Act 2015 and the expected behaviours/actions required of a Vindis Group team member. This will be completed and implemented by 31st October 2019;
- developing a system for supply chain verification which is expected to be in place by 31st October 2019), whereby the Company evaluates potential suppliers before they enter the supply chain; and
- is reviewing its existing supply chains which is expected to be completed by 31st October 2019), whereby the Company evaluates all existing suppliers.

Training

The Company's modern slavery training will cover:

- 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 Company;
- what external help is available, for example through the Modern Slavery Helpline;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

Board approval

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

Director's signature:



Director's name: JAMIE VINDIS

Date: 09/04/2019