



Modern Slavery Statement 2018

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.

Organisation Structure

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

Our Supply Chains

Our supply chains include a variety of national, local and international suppliers to source goods, services and equipment for the operation of its businesses. In particular we work principally with BMW manufacturer from whom we obtain our principal products, motor vehicles and aftersales parts.

Our policies on slavery and human trafficking

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 effective 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 business conduct
- Employee Privacy Policy

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.

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.

KPI's

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.

For and on behalf of Vines Ltd

Sean Kelly
Group Managing Director