

## Slavery and Human Trafficking Statement

**Applies to Vertu Motors plc, Bristol Street First Investments Limited, Bristol Street Fourth Investments Limited, Vertu Motors (VMC) Limited, Grantham Motor Company Limited, Vertu Motors (Continental) Limited, Vans Direct Limited, Vertu Motors (Chingford) Limited, Vertu Accident Repair Limited, Albert Farnell Limited and Helston Garages Limited (the “Vertu Group”)**

### Purpose

The Modern Slavery Act 2015 (**MSA 2015**) focuses specifically on the issue of modern slavery to ensure offenders are suitably reprimanded with severe sentences. Modern slavery encompasses the offences of: ‘slavery’ where ownership is exercised over a person; ‘servitude’ which involves the obligation to provide service imposed by coercion; ‘forced or compulsory labour’ which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily; and ‘human trafficking’ which concerns arranging or facilitating the travel of another with a view to exploiting them.

The MSA 2015 requires large businesses, with sales of over £36 million, to be transparent about their efforts to eradicate slavery and human trafficking. This statement therefore explains the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or any part of our business. This statement is made pursuant to Section 54, Part 6 of the MSA 2015 and applies to the Vertu Group for the financial year ending 29 February 2024.

### Group structure

The Vertu Group is composed of a group of trading subsidiaries under the holding company, Vertu Motors plc. Each trading subsidiary operates motor retail dealerships (both new and used vehicles) and service and repair centres divided by franchise, or other ancillary businesses. The ancillary businesses operated by the Vertu Group include the online brokerage of commercial vehicle sales, the retail of taxis and the online sale of vehicle parts and accessories. All of its operations are based in the United Kingdom and the Vertu Group currently employs around 7,700 colleagues.

### Policies and training

We have an anti-slavery and trafficking policy in place internally, which is available to all colleagues on Vertu Central (the Vertu Group intranet) and can be accessed by third parties on request. We maintain a third party operated whistleblowing reporting system to improve the ability for colleagues and others to report any concerns promptly, confidentially and effectively. Details of this service are displayed on Vertu Central, at all of our locations and have been communicated to all colleagues.

The recruitment process operated by the Vertu Group includes the following practices to ensure it operates in a legal and ethical manner:

- verifying an individual’s identification documents and their right to work in the UK;
- procuring appropriate references; and
- where appropriate for the role applied for, carrying out a DBS (Disclosure and Barring Service) check.

As part of the Vertu Group’s induction process and throughout colleagues’ employment with us, we train all colleagues to treat others with respect and courtesy as well as ensuring they adhere to the Vertu Group’s various policies and procedures for colleagues (which can be accessed via Vertu Central at any time) as well as all relevant laws, regulations and standards. This is an ongoing process and includes a compulsory online element covering various compliance topics. The modern slavery module is compulsory for all to ensure that awareness is there across the Vertu Group.

We focus on ensuring our management team is not only aware of the requirements to be alert to modern slavery but can also address concerns raised by their team or any suppliers. If any colleague is found in breach of our policies, we would ensure suitable disciplinary action is taken which could include termination.

The Vertu Group values include 'Integrity' and 'Respect' and these are embedded in the culture of the Vertu Group.

### **Supply Chain Overview**

Our main suppliers are the vehicle manufacturers themselves who supply vehicles and parts. In addition, we have commercial arrangements with vehicle finance and insurance providers, professional service providers (e.g. legal, accountancy and cleaning) as well as suppliers of other goods and services (e.g. valeting services, workshop goods/consumables and company uniforms). Consequently, the supply chain prior to the sale of a completed vehicle or the service and repair of a vehicle is complex and has many layered and often overseas elements.

This makes it challenging for the Vertu Group, as a UK motor retailer, to see or manage any issues in that supply chain. Respecting human rights and environmental issues in that supply chain is ultimately our manufacturer suppliers' responsibility.

However, the Vertu Group has a number of other significant suppliers with contracts negotiated at group level and numerous smaller suppliers at a group or local level.

### **Supply Chain Standards**

We allow all individuals who work or provide services to us the right to freely choose employment and, the right to associate freely with other individuals. As a result of our training, we offer an environment which is free from harassment and unlawful discrimination. We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation. We do not engage in forced or involuntary labour and have a zero tolerance approach to this, meaning we do not tolerate any of our suppliers engaging in such conduct.

In our standard procurement process for group-wide contracts (when engaging with a new supplier or renewing arrangements with an existing supplier), we request and review references and we issue contracts that incorporate this statement in a standalone section and standard Terms and Conditions (T&Cs). The T&Cs include specific requirements on our suppliers to adopt and enforce policies to address issues such as forced labour. Via the T&Cs we are also asking all group-wide suppliers to confirm:

- that they have read our policy on anti-slavery and trafficking and will adhere to it;
- whether or not they have implemented their own contractual arrangements with prohibitions against modern slavery and trafficking; and
- whether or not they have their own anti-slavery and human trafficking policy and have conducted a modern slavery risk assessment.

We continue to assess the risk of slavery and trafficking in our supplier due diligence process, especially for areas of the business we deem to be higher risk, for example valeting suppliers, where we have (and will periodically refresh) enhanced checks.

We seek to identify and do business with companies that have values consistent with ours, including applying these expectations to their own supply chain.

The T&Cs clearly state that we will not tolerate forced labour (including human trafficking) or child labour or abusive disciplinary processes in our supply chain. We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered.

### **Effectiveness**

As we have a zero tolerance approach to modern slavery, and have not identified any indications that it occurs in the Vertu Group or in our supply chain, we have not adopted any performance indicators. However, our ongoing work with our suppliers should indicate if any of them are not implementing appropriate measures or cannot provide the necessary confirmations to us.

**Approval**

The board of directors of the Company approved this updated statement at its board meeting on 21 March 2024.

**Dated:** 21 March 2024  
David Crane, COO, on behalf of **Vertu Motors plc**

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