

Modern Slavery Act Statement

Stephen James (Automotive) Ltd is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers. Stephen James (Automotive) Ltd believes it is our responsibility to uphold the highest standards of ethical behaviour and personal integrity within our business operations. Wherever we do business, our colleagues are required to comply with all applicable laws, rules, and regulations.

Modern slavery is a crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. Stephen James (Automotive) Ltd has a zero-tolerance approach to Modern Slavery and is fully committed to preventing slavery and human trafficking in our operations and supply chain. As a company we are committed to protecting our organisation and those people at risk from exposure to slavery or human trafficking in our supply chain, both via our direct employees and those working on our behalf via third party suppliers.

Organisational Structure and Background

Stephen James Alliance Limited is the parent company of DC Management Services Limited which in turn is the parent company of Stephen James (Automotive) Limited. Stephen James (Automotive) Limited operates franchised motor dealerships from multiple sites around the M25 and the latter holds the property assets from which these activities operate. The Company employs c. 360 people and has an annual turnover circa £200m.

We strive to deliver an exceptional customer experience; our colleagues are highly trained, enthusiastic, knowledgeable and driven to deliver our fundamental commitment to our customers; we strive to get it right first time and make each and every interaction special. Our aim is to be considered the best privately owned company to work for in the industry and the best company to do business with.

Our Colleagues and Policies

Our colleagues are all provided with a written contract of employment as well as access to a company handbook which contains the policies that governs their employment. Each colleague has a personal responsibility to read the handbook, as well as to ensure that they fully understand our obligations and the consequences associated with any breach of those obligations. We are committed to uncompromising integrity in all that we do and how we relate to each other and to our customers.

It is a fundamental policy of Stephen James (Automotive) Ltd to conduct business with reference to our 5 core values which are; Unquestionable Honesty, Unrivalled Service, People Obsession, Outrageous Creativity and Giving Back. We appreciate that our employees play a key role in maintaining high standards and ensuring that, as a business, we are compliant in all aspects of regulations set forth by the UK Government.

The Company operates a robust recruitment process in accordance with UK legislation. Interviews are conducted for all roles, ensuring that all those employed over the age of 16 have control and possession of their own passport, and are eligible to work in the UK.

Our Third-Party Supply Chain

The Motor Trade supply chain is one of the most complicated in any industry. The breadth, depth and interconnectedness of the automotive supply chain make it challenging to effectively manage and mitigate the risk of modern slavery. We also recognise that the nature of the motor industry is such that our supply chain for new and used vehicles is multifaceted as any given vehicle will have its own supply chain for the various component parts. We therefore understand that ultimately our vehicle supply chain begins with the sourcing and manufacturing of the raw materials required for any part of a vehicle. As our relationship is with the vehicle manufacturer and not with their supply chain, BMW & MINI provide comprehensive information regarding the supply chain on their website and publish details of identifiable risks and any steps required for remediation.

Stephen James (Automotive) Ltd is 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 our contractors, suppliers, and other business partners. We establish a relationship of trust and integrity with all our suppliers, which is built on mutually beneficial factors. The use of service provider contractors in our organisation is largely within our facilities support area but not limited to this part of our business.

The business created a Supplier register and a Supplier Code of Conduct which outlines our expectations. The Supplier Code of Conduct lists the Mandatory Policies, and we expect Suppliers to adhere to these standards or higher. The relevant account managers will monitor and enforce compliance of the Supplier Code of Conduct.

Of the 457 suppliers used during 2020, of the supply chain 100% are based in the UK and EU and are considered low risk. No instances of modern slavery have been identified within our supply chain, the business has not considered implementing KPIs however, this remains under review.

Due Diligence

Stephen James (Automotive) Ltd continues to take its responsibilities seriously and build upon the actions already in place to assist in the identification and mitigation of the risk of Modern Slavery.

Our Approach:

- Continue to assess the risk of slavery and trafficking into our supplier due diligence process for areas of the business we deem to be higher risk. Valeting, site cleaning and waste management offer the higher risk.
- Stephen James (Automotive) Ltd expanded on the e-learning and business policies, refreshing and expanding the information and training given to staff. We will continue to provide awareness communications to its employees and make available e-learning training. The e-learning training is included as part of its introduction programme for new employees.
- Continue to provide e-Learning training for Management to enable them to identify, assess, mitigate and report specifically on Modern Slavery. Under our Supplier Code of

Conduct we also require our business partners to provide regular and relevant training to their staff, suppliers and providers.

- Continue to publish our Modern Slavery Policy within our employee handbook and increase staff awareness of what to look for and how to raise any concerns.
- Continue to ensure that our confidential employee reporting hotline is clearly promoted in all of our sites and websites.
- Continue to ensure that our Modern Slavery posters that provide guidance on signs to look out for and how to report concerns are displayed in employee areas.

Whilst ultimately most risks within the business rest with our manufacturers and suppliers we are not complacent and will continue as a Company to seek to identify and manage any potential risks associated with Modern Slavery. We have endeavoured to put safeguards in place to ensure, so far as is reasonably practicable, that the working practices of those employed directly by us and those with whom we have a direct contractual arrangement with also have a similar zero tolerance to Modern Slavery.

NEXT STEPS

- Continue to raise awareness of the Anti-Slavery and Human Trafficking Policy and Supplier Code of Conduct with our employees and suppliers.
- Conduct regular audits of the suppliers of valeting, site cleaning and waste management.

Our board of directors has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. The Group HR Manager has day-to-day responsibility for operating the policy and ensuring its maintenance and review.

We are fully committed to consolidate this work in all that we do. We shall continue our efforts in identifying and addressing any form of slavery that could exist within our businesses at Stephen James and within our supply chain.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Stephen James (Automotive) Ltd.'s Modern Slavery statement for the financial year ending 31 December 2020.

Stephen James (Automotive) Ltd



Richard Ennis
Managing Director