

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

For the purpose of this document the following companies, which are all associated with each other, will be referred to as “The William Morgan Group”.

North Oxford Garage Ltd

Wollaston Motors Ltd

The William Morgan Group is fully committed to understanding the risks of modern slavery.

In accordance with the Modern Slavery Act 2015 this statement outlines the steps taken by the William Morgan Group to prevent slavery and human trafficking from occurring in the company or supply chains.

The William Morgan Group operates BMW and MINI franchises in Oxfordshire and Northamptonshire. The activity of the business includes the sale and servicing of BMW and MINI vehicles, the sale of Parts and a BMW approved Bodyshop. The William Morgan Group maintains relationships with many different organisations in its supply chains and employs approximately 300 people.

The functions across the William Morgan Group are:

- new and used vehicle sales
- facilitating financing vehicles and providing insurance products
- vehicle servicing, repair and MOT testing
- parts and accessories sales
- corporate sales
- carrying out accident repairs
- Head Office support functions including Accounts, Marketing and Human Resources

Our Supply Chains

The automotive supply chain is one of the most complicated of any industry. There are often six to ten levels of suppliers between the car manufacturer and the source of raw materials that enter the manufacturing process. The William Morgan Group has a zero tolerance approach to slavery and human trafficking and is committed to ensuring that there is no slavery or human trafficking in its supply chains or in any part of the business. The William Morgan Group expects all of its suppliers to be committed to preventing slavery and human trafficking.

This Anti-Slavery Statement underpins the William Morgan Group’s anti-slavery and human trafficking policy and reflects its commitment to put in place systems and controls which ensure slavery and human trafficking is not taking place anywhere in the business or related supply chains.

Due Diligence

The William Morgan Group sources and sells products and parts from a broad range of national and international suppliers. Due to the breadth of the businesses and supply chains The William Morgan Group is not in a position to check every business relationship and avenue. The principal areas in which there is a risk of human trafficking and slavery are those related to its supply chains. The William Morgan Group takes a risk based approach in assessing its potential exposure to slavery and human trafficking in its supply chains

Although the William Morgan Group recognises its statutory obligation to take practical steps to **prevent modern slavery and human trafficking from occurring in its supply chains, the William Morgan Group** is not able to control the conduct of individuals and organisations in its supply chains.

The practical steps which the William Morgan Group intends to take are as follows:

- Conduct risk assessments to determine which parts of the business and which suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- Engage with those suppliers identified as potentially at risk in order to communicate to them the William Morgan Group Anti-Slavery Policy and to understand what measures they have taken to ensure modern slavery is not occurring in their businesses.
- Ensure all business activity complies with minimum wage legislation and to ensure that this requirement is met by all of the Group's contractors who are identified by the William Morgan Group as potentially at risk.
- Ensure all William Morgan Group employees have the right to work in the UK and to ensure that this requirement, to only employ staff with the right to work in the UK, is met by all of the William Morgan Group's UK contractors who are identified by the William Morgan Group as potentially at risk

In the event the William Morgan Group becomes aware of any instances of non-compliance from its suppliers, each instance will be investigated and assessed by the William Morgan Group on a case by case basis. Remedial action will be taken appropriate to the circumstances of each case. The William Morgan Group will temporarily suspend its business (to the extent permitted under contract or by law) with any supplier who it suspects of non-compliance. If a supplier continually fails to comply, then the ultimate sanction will be for the William Morgan Group to cease to trade with that supplier (to the extent as permitted under contract or by law).

Training

This statement and the William Morgan Group's Anti-Slavery Policy has been communicated to all current employees and is included in the William Morgan Group induction, to ensure a high level of understanding of the company's zero tolerance approach to modern slavery and human trafficking in its supply chains and its business and the Group's commitment to preventing modern slavery and human trafficking from occurring in its business and supply chains.

The William Morgan Group operates a number of policies and procedures which promote and enforce the company's zero tolerance approach in order to reduce the risk of slavery and human trafficking from occurring. These policies and procedures are reviewed regularly and include:

- Modern Slavery Policy
- Equal Opportunities Policy
- Recruitment Policy
- Grievance Policy
- Whistleblowing Policy
- Anti-corruption and bribery Policy
- Anti-harassment and Bullying Policy

Statement Publication and Review

From the financial year ending 31st December 2017 the William Morgan Group Anti-Slavery and Human Trafficking Statement has been posted on the William Morgan Group's individual company's websites. Following its initial adoption, this Anti-Slavery and Human Trafficking Statement will be reviewed by the Company's Board of Directors on an annual basis and will be published no later than the publication of our annual financial results.

William Le Fevre

Group Managing Director