

## **Modern Slavery Act Statement**

Sytner Group 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 heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. Sytner Group 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**

Sytner Group represents the world's most desirable car manufacturers in 114 retailing locations across the UK. Sytner Group remained the UK's largest motor dealer by revenue in 2018, employing over 10,700 people and retailing over 209,000 cars per annum. Despite our growth and increasing scale, we are proud to still retain a strong family 'Sytner' culture across all of our dealerships. During 2018, the company were also named as 'Dealer Group of the Year' by Automotive Management and Motor Trader Magazine, consolidating our position as the UK's largest and most successful dealer group. Our success has been built by every colleague working together and contributing to our one team ethos. 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 ultimate aim is to be considered the best company to work for in the industry and the best company to do business with.

Sytner Group is headquartered in Leicester, England with sites across the UK operating under a portfolio of well-known brands. Sytner Group's parent company, Penske Automotive Group, is headquartered in Detroit, Michigan in the USA. This statement relates solely to Sytner Group and all the entities that it represents:

- Maranello Concessionaires Limited
- Sytner Limited
- Cruickshank Motors Limited
- R Stratton & Co Limited
- Sytner Cars Limited
- Graypaul Motors Limited
- Goodman Retail Limited
- Guy Salmon Limited
- Goodman TPS Limited
- Sytner Vehicles Limited
- Car Shops Limited
- The Car People Limited
- Trade Parts Specialists (NI) Limited
- APCB Limited
- Agnew Commercials Limited
- Stanley Motor Works (1932) Limited
- Agnew Corporate Limited
- Isaac Agnew Limited
- Agnew Autoexchange Limited

### **Our Colleagues**

Our colleagues are all provided with a written contract of employment as well as access to a company handbook which contains any policy 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 Sytner Group to conduct business with honesty and integrity and in accordance with the highest standards of ethics, equality and fair dealing. We appreciate the key role that Sytner Group employees play in maintaining high standards and ensuring as a business we are compliant in all aspects of regulations set forth by the UK Government.

We provide a confidential whistleblowing helpline that encourages our colleagues to report any concerns related to the direct activities, or the supply chain of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. These reports are reviewed by the most senior directors of both Sytner Group and Penske Automotive Group.

## **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, we're keen to engage with our suppliers to ensure that they match our high standards and the ethos of the Modern Slavery Act 2015 and filter this message down throughout their own supply chain.

Sytner Group 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 of 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.

## **Due Diligence**

Sytner Group continues to take its responsibilities seriously and whilst building on the actions already in place, we will continue to look for more ways to fortify our method of identifying and mitigating 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; this due diligence includes requiring them to complete questionnaires on their own policies concerning the issue.
- Continue to issue our Modern Slavery Policy and Supplier Code of Conduct that highlights the standards of compliance expected. Third party suppliers and contractors we deem to be higher risk are required to sign to say that whilst carrying out its obligations to Sytner Group they shall comply, and seek to ensure that each of its own subcontractors and suppliers involved in the provision of goods and services will comply with the documentation.
- Continue to provide e-Learning training for Management to enable them to identify, assess, mitigate and report specifically on Modern Slavery.
- Continue to publish our Modern Slavery Policy within our employee handbook.
- Continue to ensure that our confidential employee reporting hotline is clearly promoted in all of our sites.
- Continue to ensure our Modern Slavery poster that gives an overview of the signs to look out for, including how employees can report concerns regarding Modern Slavery are displayed in our colleague areas throughout our Company.

- Continue to conduct supplier audits on companies we deem to be higher risk. Audits include visiting supplier registered offices and requiring visibility to relevant paperwork that gives us confidence and reassurance that those employed are not subject to Modern Slavery in any form.

Whilst ultimately the majority of 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.

In the next 12 months we will continue to evolve and strengthen our approach to managing the risk of Modern Slavery within our business and ensure our strategy is responsive.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Sytner Group Ltd.'s Modern Slavery statement for the financial year ending 31 March 2019.



Sytner Group  
Darren Edwards  
Chief Executive

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