

## **Modern Day Slavery Statement**

The following statement is made on behalf of the following businesses: Sandal Motors (Bayern) Ltd "Sandal Wakefield", Sandal Motors (Huddersfield) Ltd "Sandal Huddersfield" and parent company Findpath Ltd.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for financial year ending 31<sup>st</sup> December 2018.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Our Modern Slavery policy is detailed below. Over the coming year we will require suppliers to produce or confirm that they have implemented a Modern Slavery Policy. A failure to comply entitles us to terminate the contract or not renew the contract with such suppliers.

### **Our business**

We are a privately owned BMW and MINI franchised Retailer. We supply BMW and MINI vehicles as well as offering servicing and parts to our customers. The main supplier of parts as well as BMW and MINI vehicles to our business is BMW (UK) Ltd.

Findpath Ltd, Sandal Wakefield and Sandal Huddersfield have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to dealing with our responsibility to eradicate modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners. We will abide by our responsibility to ensure that those we deal with exercise prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or domestic servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. Having conducted a review of our main suppliers, we are delighted that we work in partnership with companies who are committed to ensuring that modern slavery is eradicated. In future we will continue to monitor suppliers and if we enter into a new contract endeavour to ensure that the business complies with the Modern Slavery Act 2015.

### **Responsibility for the Policy**

This policy applies to all persons working for Findpath Ltd, Sandal Wakefield and Sandal Huddersfield or on our behalf in any capacity, including employees at all levels, directors, contractors, suppliers, external consultants and business partners.

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Board of Directors has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Departmental Management are responsible for ensuring those reporting to them understand and comply with this policy.

#### Compliance with the Policy

All employees must read, understand and comply with this policy. This policy forms part of our terms and conditions of employment.

The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier, at the earliest possible stage without fear of retribution or detrimental treatment. Employees must notify the Operations Director / Head of Business or a member of the HR department if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

If a breach of this policy has occurred, Management must be notified as soon as possible. If anyone is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains, constitutes any of the various forms of modern slavery, it must be raised with Operations Director / Head of Business or a member of the HR department.

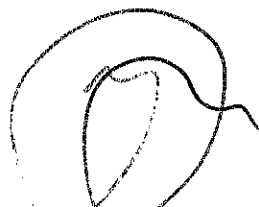
We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if after investigation they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If employees believe that they have suffered any such treatment they should inform the HR department immediately. If the matter is not rectified employees should raise this under the company grievance procedure. In order to provide employees with appropriate support the HR department will develop a whistleblowing policy within the next year.

#### Breaches of the policy

Any employee who breaches this policy will face disciplinary action which could, after appropriate and thorough investigation, lead to their summary dismissal.

Findpath Ltd, Sandal Wakefield and Sandal Huddersfield may terminate its relationship with other individuals, suppliers and organisations working on our behalf if they breach this policy.

Signed:



Position in Company: FINANCE DIRECTOR

Date: MARCH 2019