

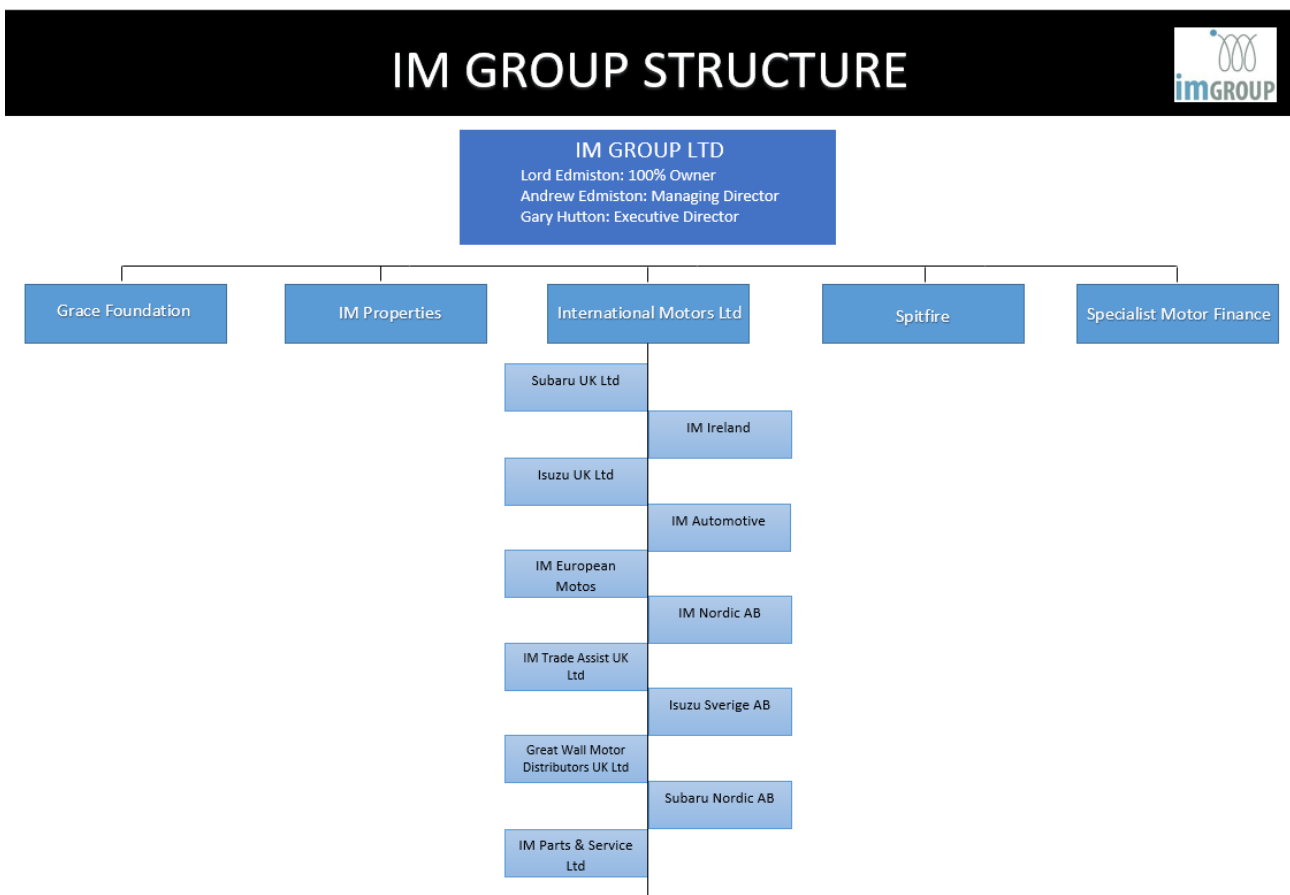
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE YEAR ENDING

MARCH 2020

1. This is IM Group’s third annual Modern Slavery and Human Trafficking Statement made pursuant to section 54.1 of the Modern Slavery Act 2015 for the year ending March 2020. It is made on behalf of all companies within IM Group. A list of the main companies within IM Group is set out in Appendix 1. This statement sets out the steps IM Group have taken and will take during this financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business and it also addresses those other matters set out in the Home Office statutory guidance.

IM Group is an active member of the Slave Free Alliance.

2. Structure and Supply Chains



IM Group, as the above diagram shows, embraces three core functions; property, automotive importation and finance. The activities undertaken by the relevant subsidiaries in these areas are complex and involve supply chains which in some instances stretch literally around the globe.

3. IM Group's policy in relation to modern slavery and human trafficking

IM Group is committed to opposing modern slavery in all its many forms and preventing it occurring either in our business or in our supply chains.

Our Chairman Lord Edmiston who supported the Modern Slavery Act from the government benches of the House of Lords has said this: "There are over 20 million people worldwide who are victims of involuntary servitude or compulsory labour. This is, therefore, not a problem which can be solved overnight but nor is it one which can be ignored. The Modern Slavery Act is an important step in the process and I have committed IM Group not just to be compliant with the Statute but to go beyond the minimum required and to try wherever we can assist in the elimination of these evil practices".

IM Group's policy in relation to modern slavery and human trafficking is accordingly one informed by its Chairman's deeply held beliefs and convictions: it is, therefore, to ensure that its business and suppliers do not directly or indirectly engage in practices which are prohibited by the Modern Slavery Act.

4. IM Group's due diligence procedures in relation to modern slavery and human trafficking in our business and supply chains

We have altered our standard terms of business so as to include provision to the following effect:

X agrees to use its best effort to ensure that neither it nor any of its subcontractors, vendors, agents or other associated third parties will utilize child, slave, prisoner or any other form of forced or involuntary labour, or engage in abusive employment or corrupt business practices or engage in any activity which constitutes an offence under any applicable laws in the countries in which it will manufacture the Vehicles which are the subject of this Agreement.

X agrees to use its best effort to comply with all applicable anti-corruption laws in the countries in which it will manufacture the Vehicles, and to ensure that neither it nor any of its subcontractors, vendors, agents or other associated third parties will engage in any form of commercial bribery, nor directly or indirectly provide or offer to provide, anything of value to or for the benefit of, any official or employee of a governmental authority or of any government-owned, government-controlled or government-affiliated entity to obtain or retain any contract, business opportunity or other business benefit, or to influence any act or decision of that person in his/her official capacity.

In case of non-compliance with the provisions of this Article by either party, the other party may terminate this Agreement in accordance with Article X under this Agreement.

5. Risk Assessment: The parts of our business and supply chains where there is a risk of modern and human trafficking taking place and the steps we have taken to assess and manage that risk

Before entering into any new agreement for the supply of any service or product we make an assessment – using a detailed schedule of criteria – as to whether the supplier is engaged in prohibited practices and we only enter into an agreement with that supplier if that assessment is positive.

6. Measuring Effectiveness: Our effectiveness in ensuring that modern slavery and human trafficking are not taking place in our business or in our supply chains

After 3 years of vigilance in this area we are confident that our business and supply chains are now clear of any prohibited practices

7. Training for Staff: IM Group's staff training programme in relation to modern slavery and human trafficking

All senior staff have received a briefing with regard to the Modern Slavery Act as well as background material relating to the practices which are now prohibited by the Act. The staff will also receive during the course of this year in depth training with regard to:

- a) Identifying prohibited practices.
- b) What steps to take if any prohibited practices identified or suspected by them anywhere within our business or supply chain.

March 2020 – Approved by the IM Group Board of Directors



Gary Hutton

Executive Director

**Annex 1** – The principal corporate entities operating within IM Group are set out below. Please note that this list is not all inclusive and this Statement relates to all companies which form part of IM Group whether or not they are currently trading and active and whether or not they are included in the list below.

| Name of Entity                        | Country | Division   |
|---------------------------------------|---------|------------|
| I.M. Group Limited                    | England | Parent     |
| I.M. Facilities Limited               | England | Automotive |
| International Motors Limited          | England | Automotive |
| Subaru (UK) Limited                   | England | Automotive |
| Isuzu (UK) Limited                    | England | Automotive |
| I.M. Parts and Service Limited        | England | Automotive |
| Daihatsu Vehicle Distributors Limited | England | Automotive |
| I.M. Trade Assist Limited             | England | Automotive |

|  |          |            |
|--|----------|------------|
| Great Wall Motor Distributors (UK) Limited | England  | Automotive |
| I.M. Insurance Limited                     | Guernsey | Insurance  |
| International Motors Finance Limited (49%) | England  | Automotive |
| I.M. Automotive Limited                    | Ireland  | Automotive |
| I.M. European Motors Limited               | Ireland  | Automotive |
| I.M. Properties PLC                        | England  | Property   |
| I.M. Properties (Coleshill) Limited        | England  | Property   |
| I.M. Properties Development Limited        | England  | Property   |
| I.M. Properties Finance Limited            | England  | Property   |
| Spitfire Bespoke Homes Limited             | England  | Property   |
| Specialist Motor Finance Limited           | England  | Finance    |
| The Funding Corporation Limited            | England  | Finance    |
| IMP Residential Capital Markets Limited    | England  | Property   |
| IMP Investments HSBC Limited               | England  | Property   |
| IM Properties Investments HSBC 2 Limited   | England  | Property   |
| IMP Investments RBS Limited                | England  | Property   |
| WATAD (UK) Properties Limited              | England  | Property   |
| IMP Investments RBS 2 Limited              | England  | Property   |
| IM Land 1 Limited                          | England  | Property   |
| IM Land 3 Limited                          | England  | Property   |
| IM Properties Strategic Land Group Limited | England  | Property   |
| IM Land 4 Limited                          | England  | Property   |
| IMP Hill Top Estates Limited               | England  | Property   |
| IMP Investments LGB Limited                | England  | Property   |

|   |         |            |
|---|---------|------------|
| IMP Investments SHB Limited                   | England | Property   |
| IMP Investments Ltd                           | England | Property   |
| Spitfire Properties (Newhall) Limited         | England | Property   |
| IM Properties (BVP 3) Limited                 | England | Property   |
| IMP Development Management Limited            | England | Property   |
| IM. Land 2 Limited                            | England | Property   |
| IMP Residential 2 Limited                     | England | Property   |
| Specialist Motor Finance Services Limited     | England | Financial  |
| Specialist Motor Finance Group Limited        | England | Financial  |
| I.M. UK Trade Company Limited                 | England | Automotive |
| I.M. Properties (BVP 1) Limited               | England | Property   |
| International Motors Parts & Service Limited  | England | Automotive |
| KVD Limited                                   | England | Automotive |
| I.M. Holdings Limited                         | England | Property   |
| I.M Financial Services Limited                | England | Financial  |
| I.M. Funding Limited                          | England | Financial  |
| I.M. Finance Limited                          | England | Financial  |
| Brampton Property Development                 | England | Property   |
| Ensleigh Property Management Company Limited  | England | Property   |
| I.M. Group (Ensleigh) Limited                 | England | Property   |
| I.M Properties Birmingham Development Limited | England | Property   |
| I.M. Distribution Limited                     | England | Automotive |

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|---|---------|------------|
| Mahindra Car Distributors (UK) Limited  | England | Automotive |
| I.M. Equipment Limited                  | England | Automotive |
| I.M. Aviation Limited                   | England | Automotive |
| I.M. Properties (Croydon) Limited       | England | Property   |
| I.M. Properties (Milton Keynes) Limited | England | Property   |
| Great Wall Motor Company Limited        | England | Automotive |
| The Funding Corporation Group Limited   | England | Financial  |
| I.M. Properties (Dordon 2) Limited      | England | Property   |
| I.M. Properties (Logistics) Limited     | England | Property   |
| I.M. Properties Estates Limited         | England | Property   |
| I.M. Properties (Reading 2) Limited     | England | Property   |
| I.M. Property Trading Limited           | England | Property   |
| I M Properties (SHB) Limited            | England | Property   |
| I.M. Properties (Guildford 1) Limited   | England | Property   |
| I.M. Properties (Bristan) Limited       | England | Property   |
| I.M. Properties (Mell Square 1) Limited | England | Property   |
| I.M Properties (BVP 2) Limited          | England | Property   |
| The Funding Corporation (1) Limited     | England | Financial  |
| The Funding Corporation (2) Limited     | England | Financial  |
| Cygnet Financial Services Limited       | England | Financial  |
| ACF Car Finance Limited                 | England | Financial  |
| I.M. Properties (WHB) Limited           | England | Property   |
| Yorkshire Property Holdings Limited     | England | Property   |
| I.M. Properties (Guildford 2) Limited   | England | Property   |

|   |         |           |
|---|---------|-----------|
| IM Properties (Magna Park) Limited                  | England | Property  |
| I.M. Properties (Maidenhead) Limited                | England | Property  |
| I.M Assured Growth and Exit Plc                     | England | Property  |
| I.M. Property Holdings Limited                      | England | Property  |
| First Residential Investment Limited                | England | Property  |
| I.M. Properties (Longton) Limited                   | England | Property  |
| I.M. Properties Investment Limited                  | England | Property  |
| I.M. Properties Finance Limited                     | England | Property  |
| I.M Properties (Birmingham) Limited                 | England | Property  |
| I.M. Properties (Abbey) Limited                     | England | Property  |
| I.M Finance Limited                                 | England | Financial |
| BVP Residential Management Company Limited          | England | Property  |
| Milcote Close (Welford) Management Company Limited  | England | Property  |
| Brampton Property Development Limited               | England | Property  |
| Original Services Limited                           | England | Property  |
| Bay Green (Clevedon) Management Company Limited     | England | Property  |
| Greenings (Long Crendon) Management Company Limited | England | Property  |
| Upper Acres (Ettington) Management Company Limited  | England | Property  |
| Hillcroft (Gretton) Management Company Limited      | England | Property  |

|   |         |          |
|---|---------|----------|
| Ashwood (Hockley Heath) Management<br>Company Limited               | England | Property |
| Haseley Manor Management Company Limited                            | England | Property |
| Highworth (Broadway) Management Company<br>Limited                  | England | Property |
| Regents Green (Leamington Spa) Estate<br>Management Company Limited | England | Property |
| Green Gates (Maidenhead) Management<br>Company Limited              | England | Property |
| Spitfire Homes Holdings Limited                                     | England | Property |
| Spitfire Properties 2 Limited                                       | England | Property |
| St Marks Gate Management Company Limited                            | England | Property |
| Spitfire Properties LLP   | England | Property |