

IM Group Modern Slavery Statement 2025

IM Group (IMG (UK) Holdings Limited and its subsidiary entities) recognises that the potential for modern slavery exists in many sectors, and we must do everything we can to prevent any form of slavery, human trafficking, or any other unethical behaviour.

We are dedicated to developing, implementing, and enforcing effective systems and controls to ensure that we address the threat of modern slavery within our business and in our supply chains.

We have zero-tolerance for slavery and human trafficking, and we expect our supply chains to take the same stance.

This statement is IM Group's eighth modern slavery statement. It sets out the steps that IM Group and its subsidiary companies have taken during the financial year ending December 2024 to combat slavery and human trafficking in our business and supply chains.

Sign Off:

- This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for IM Group.
- This statement covers the IM Group and all its entities as set out here: <https://www.imgroup.co.uk/list-of-active-dormant-companies/>
- This statement has the support of the IM Group Board of Directors and was approved by the Board on the 14th July 2025.

Date: 14th July 2025

Signed:

Andrew Edmiston

Managing Director – IM Group Ltd

Date: 14th July 2025

Signed:

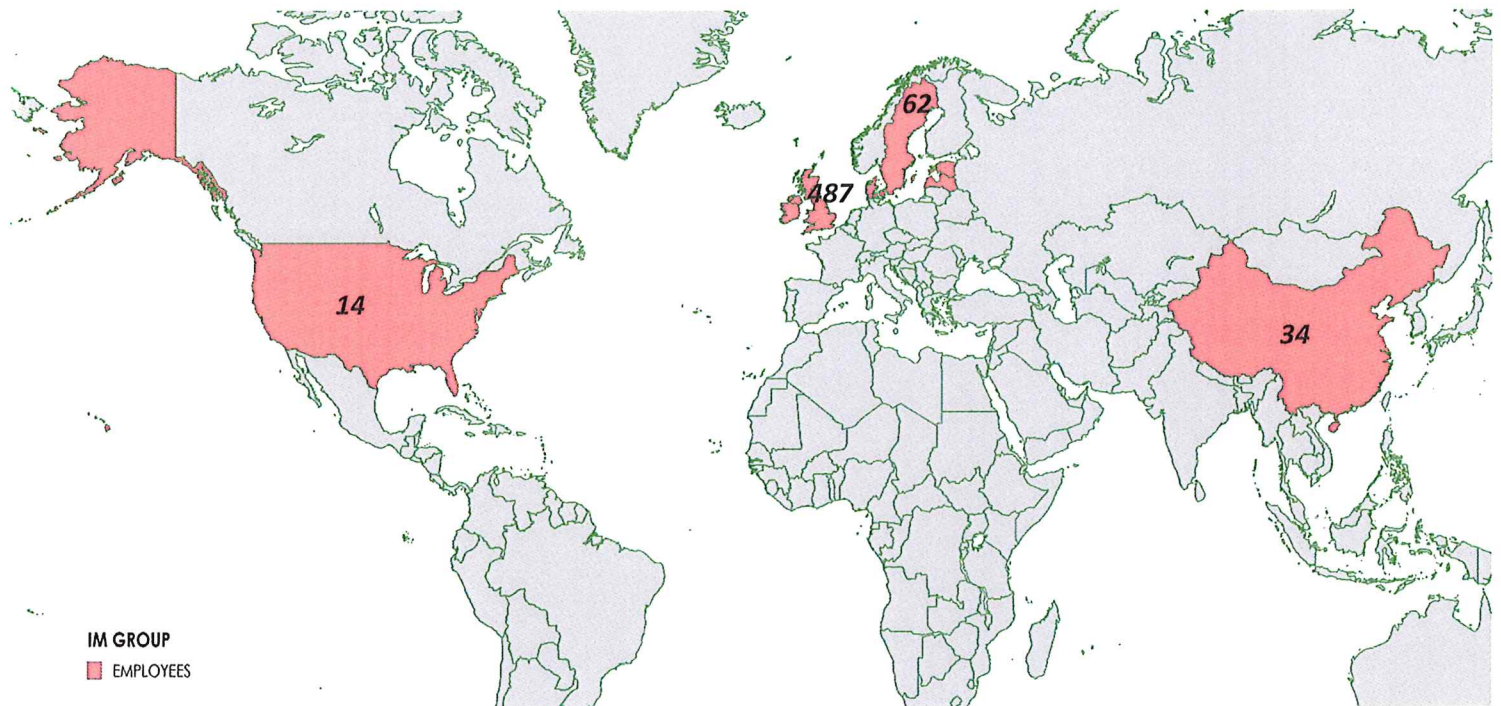
Gary Hutton

Executive Director – IM Group Ltd

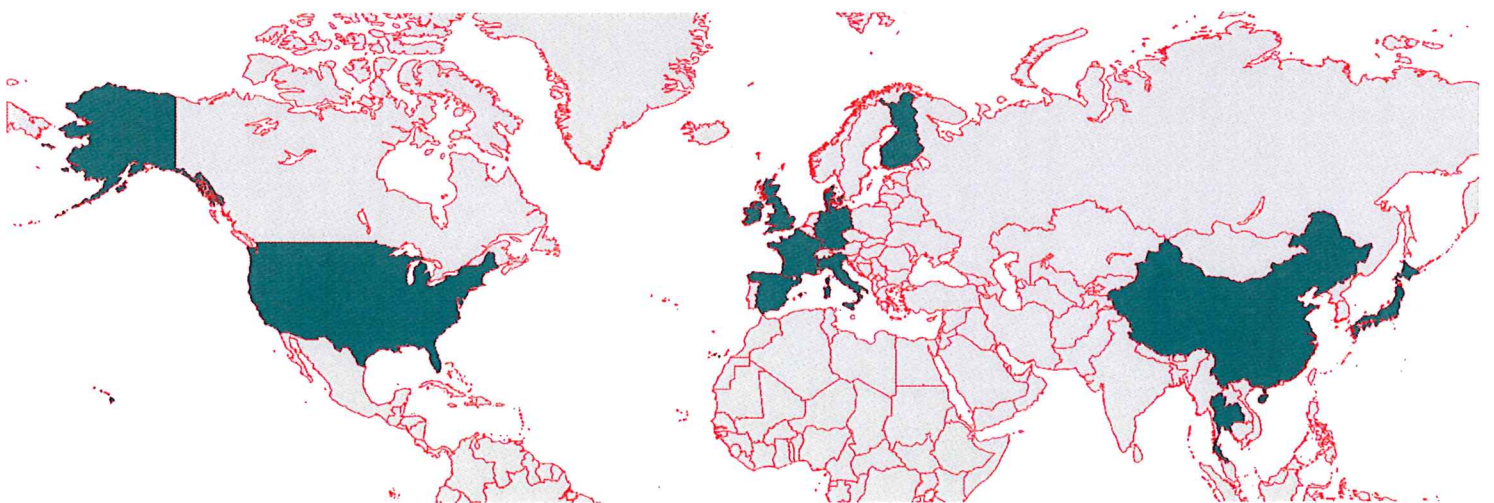
Our Business and supply chain

IM Group is a large, family owned, international company established in 1977. The Group operates a diverse portfolio of companies in the automotive, property and finance sectors. Our specialist independent, exporter expertise and local market knowledge is used to support our business partners to achieve our Modern slavery goals. Our head office is in Solihull, West Midlands with other offices in the UK, USA, China, Baltics and Nordic countries.

EMPLOYEES:















SUPPLIERS:



Through our diverse business portfolio, we procure a wide range of goods and services. Our core businesses each have a specific supply chain footprint with different characteristics, challenges and opportunities. We interact with our suppliers in many ways such as tendering, surveys, site inspections and audit processes. Group and the automobile brands are part of an inhouse contract management system, and this is expanding to the residential property portfolio.

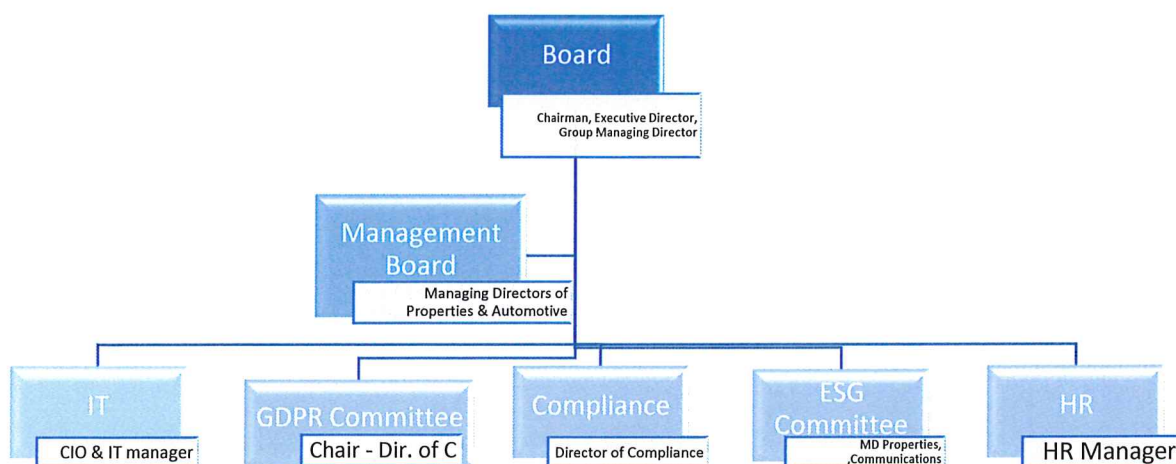
Suppliers

We source internationally across several continents, including Asia, Europe and America and with the assistance of Slave free alliance have mapped our first-tier suppliers in rank across our Group and automobile businesses to high/medium/low risk including spend and % breakdown which enable us to prioritise our actions. To date our mapping has not extended to all indirect suppliers so we are working on several projects to improve the breadth and depth of our mapping according to our risk assessment. Of the 130 Lines of car parts that we import we have 30 suppliers in China & Europe (Italy, Spain, Belgium & Netherlands) each of our suppliers must follow our contract management system to ensure transparency and accountability as defined in section

Automobile & Group	Property	Finance
<p>We import vehicles from China and Japan to sell through dealership networks in the UK and Europe along with the parts and warranty services to ensure ongoing service for the vehicles.</p> <p>Group services cover all of the infrastructure in running the Group of businesses.</p>	<p>We deliver award-winning, high-quality property in both the UK and USA– on both our commercial and residential developments, known as Spitfire. We also manage a property investment portfolio.</p>	<p>SMF is a customer focused asset management business regulated by the FCA to provide car finance to those that need it.</p>
 369 Employees	 127 Employees	 101 Employees
 813 Suppliers 	 465 Suppliers 	 152 Suppliers 
 53 % Supply chain spend	 33.8 % supply chain spend	 100 % supply chain spend

Governance

Structure for Human rights issues



Our compliance department works alongside the different businesses, including the business development team and property teams to design and implement our modern slavery strategy in all our locations. The Director of Compliance who is part of the ESG committee, reports to the board formally on a quarterly basis and informally when necessary. The reporting covers training & action being taken following a risk analysis mapping process of suppliers completed by an external body- SFA and the procurement teams observations. As a result, the company has recently approached The International Transport Workers Federation to complete a Rights Check and assist with supply chain mapping throughout the shipping of products.

The Board has established an Environmental, Social and Governance (ESG) committee that provides direction on the group's long-term approach to ESG, monitoring developments in this space and provides oversight and support to the Board on the potential risk for modern slavery and our approach. The committee meet quarterly, and formal minutes are taken.

Policies

We have developed global and local policies and practices to set consistent standards throughout our operations. The internal policies are relevant to all UK offices with policies adapted to the specific countries that we operate in. The author of each policy reviews on an annual or biannual basis, as appropriate, with second sign off to ensure compliance with legislation & internal processes. The Policies tackle the multi-faceted aspects of modern slavery and exploitation whilst focusing on worker wellbeing and safety standards. Relevant policies, setting out minimum standards are shared with suppliers as part

of the supplier process as they are expected to abide by them. Those most relevant to Modern Slavery are:

- Business Code of Conduct Policy
- Supplier Code of Conduct
- Modern Slavery Policy
- Whistleblowing Policy
- HR policies relating to employment including Grievance.
- Equality, Diversity, and Inclusion Policy
- Anti-Bribery & Corruption Policy
- Health and Safety policies
- Third party, Speak up Policy

Our public policy statements can be found here:

[Modern Slavery Statement](#)

[Bribery & Corruption Policy Statement](#)

[Whistleblowing Policy Statement](#)

[Equality, Diversity, & Inclusion Policy Statement](#)

The IM Group Modern Slavery policy reflects our zero-tolerance approach to modern slavery in our business and our supply chains and our long-standing commitment to:

- Acting ethically and with integrity in all our business dealings and relationships.
- Implementing effective systems and controls to enable IM Group to identify, mitigate, address, and remediate any concern of modern slavery or labour exploitation within our own business' or that of our supply chain.
- Ensuring that there is transparency in our business and in our approach to tackling modern slavery that is consistent with our disclosure obligations under the Modern Slavery Act 2015
- Encouraging openness and providing support to anyone who raises concerns relating to Modern Slavery.
- Continue to promote awareness with employees and across our supply chain monitor performance to ensure that the people we hire or who work in our supply chain are respected and are free to work in an environment free from modern slavery or labour exploitation.

The standards align to the principles of the Ethical Trading Initiative (ETI Base Code) & UN Guiding principles

Whistleblowing

All employees are encouraged to be vigilant to unethical practices and report concerns with regards to Modern Slavery and Labour Exploitation. All allegations and concerns will be taken seriously. Action will be taken to investigate any breaches of our policies. Our Modern Slavery Policy [found here](#) confirms that our employees and supply chain partners have a personal responsibility to report any actual or suspected instances of modern slavery within our business or in our supply chain. This year we have developed a detailed whistleblowing, easy to follow flow chart as part of the policy so that there is clarity and transparency for everyone involved in a potential concern of modern slavery.

- Suspected instances of modern slavery must be reported to an individual's line manager (in the case of employees) and a member of the IMG HR team at The Gate, HQ.
- Our policies are communicated internally via our SharePoint policy section and externally via our website and issued, where appropriate with contracts and terms and conditions. Suppliers and contractors are given a link to complete a confidential '[speak up](#)' form and number to call to whistle blow for any concerns, the number is available within documents and on posters and

TV screens in publicly accessible places including building site washroom facilities and as part of site induction process.

- IM policies are signed off by the Executive Director and senior management on behalf of the Board and are reviewed on a regular rolling basis.
- We have focused on the building sites and manual labour, along with factories that manufacture parts for our automobile division as we know that these present the highest human rights risks and are therefore a key part in targeting our modern slavery programme effectively.
- All reports are treated confidentially, and we have protection in place for those reporting with a genuine matter.

Risk Assessment and Management

IM Group, through its subsidiary companies directly and indirectly, purchase products, materials, services, and labour from a diverse portfolio of suppliers, distributors, labour agencies and professional service suppliers. Our supply chain is complex, with multiple tiers stretching across the globe. We have a broad range of suppliers both in size and in terms of the products and services provided. The Compliance Team and Procurement team have started to work together to prioritise identified risks that we can implement change promptly.

Identification

We consider that our most significant modern slavery risks are in our supply chains where we undertake procurement activities and where operations and managerial oversight are out of our direct control. This may be due to manufacturers where we have minimal influence over, where we have limited visibility of the workforce and where there is temporary labour hire. Our procedures are designed to establish and assess areas of potential risk in our business and supply chains. In addition to our supply chain mapping, the Compliance department evaluated the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain by conducting a detailed slavery and human trafficking risk assessment. We worked with Slave Free Alliance to identify high risk areas of our business to focus on enhanced due diligence and to build capacity in those areas identified as higher risk where individuals are more likely to be vulnerable.

Where the assessment highlighted high-risk suppliers within the supply chain, for example based on industry, location, employee demographic, recruitment parameters etc, enhanced due diligence protocol is implemented, including:

- Where we identify instances where we are procuring materials directly from countries on the Global Slavery Index, we will engage with one of our internal or external auditors to carry out a satisfactory ethical audit review prior to making an order. If other issues are identified, appropriate investigative and remedial action is taken; and
- We have focused training for parts of the business identified as more likely to encounter modern slavery and labour exploitation and providing them with the upskilling to identify and escalate any concerns.

We understand that risk assessments are a snapshot in time and do not replace our own continuing due diligence.

To monitor those identified to enable us to reduce the risk of slavery and human trafficking occurring in our business and supply chains and protect those who are vulnerable to modern slavery and labour exploitation.

CASE STUDY:

FACTORY VISITS WERE ALREADY IN PLACE, HOWEVER, A RISK ASSESSMENT HIGHLIGHTED THAT WE NEEDED TO ENSURE THAT THERE WAS CONSISTENCY AND DETAIL RECORDED AT EACH SITE, IRRESPECTIVE OF WHO WAS COMPLETING THE VISIT. A NEW QUESTIONNAIRE HAS THEREFORE BEEN DRAFTED WITH ALL THE TEAMS THAT WILL VISIT SITES INVOLVED WITHIN THE DEVELOPMENT & IMPLEMENTATION PROCESS. THIS SYSTEM WILL BE USED AT EACH CURRENT & NEW FACTORY VISIT, COMMENCING JUNE 2025. A HISTORY LOG WILL HELP US TO LEARN FROM THE VISITS TO ENSURE THE QUESTIONNAIRE IS AN EFFECTIVE TOOL IN COMBATING MODERN SLAVERY WITHIN OUR SUPPLY CHAIN.

Some examples of the key supply chain risks that we have identified are as follows:

- *Complex supply chains with multiple tiers; the risk of forced labour is the highest in lower tiers where we have little visibility*
- *Seafarers on the ships delivering our products and parts and the complexity of ship ownership limiting accountability & the issues concerning pay, hours worked & conditions.*
- *Risk of indirect procurement of materials for our projects which are at higher risk of being produced by child labour or forced labour for which we have little oversight & Control*
- *Employment agencies included but not limited to Health & safety concerns, significant use of agency workers, temporary workers and migrant workers by our supply chain.*

Effectiveness

We also continue to work with Slave-Free Alliance to facilitate training for our staff and to ensure best practice is established within our businesses. We partner with:



Founded in 2003, **Grace Foundation** is funded by IM Group. It transforms young people's lives through holistic education experiences. Employees work closely with Grace Foundation through school engagement programme's to enhance students' personal development, wellbeing and career aspirations. <https://www.grace-foundation.org.uk/>



The **Heart of England** Community Foundation exists to support local giving and community investment across the West Midlands and Warwickshire. The Fund supports our social value initiatives by administering our company and project specific Community Funds.



Working Towards a Slave free Supply Chain

Slave Free Alliance is an international social enterprise, wholly owned by global anti-slavery charity Hope for Justice. SFA supports organisation of all sizes and from many sectors to build their resilience to modern slavery and labour exploitation.

Due Diligence

We conduct due diligence to identify and address modern slavery risks caused by, or connected to, our business. Our standard contract includes a contractual obligation to comply with our clauses relating to our Modern Slavery policy. In this way we explain that we do not tolerate slavery or human trafficking,

and our suppliers are asked to confirm that they take the same approach in their businesses and in their supply chain. As part of onboarding for all new suppliers within the business, our due diligence process includes consideration of suppliers Ethical and Environmental Practices and seeks to identify potential risk in the suppliers' supply chain; this includes Modern Slavery. Suppliers for Goods and Services are required, as part of the onboarding process, to confirm that they will abide in their business to our policy in respect of Human Rights.

For supplier management, we have a contract management system facilitated by the Compliance department for the automobile and central group sector of IM Group. Within the property business the commercial teams have responsibility for ensuring compliance with our Modern Slavery policy. As part of this we have redeveloped our Code of Conduct to include clearly defined requirements

IM Group fosters long-term working relationships with its supply chain members. Our commercial teams regularly engage with their supply chain partners and the business development team to enable due diligence and any remediation needed. We regularly assess our supply chain and conduct desk top analysis that leads to enhanced checks. Teams regularly visit suppliers on the ground and in factories in China and Europe, where they try to engage with the workforce and access the work environment. We ensure visits are conducted by different divisions of the business to enable the relationship and standards to remain professional and ensure the ethical credentials are maintained. As a result of this a new questionnaire used on mobile phones has been written and is in use by our factory auditors to ensure information collected is thorough and detailed but completed in a reassuring manner. Training for our employees is key to ensuring that although day to day management comes under the responsibility of the Compliance department, we recognise the need for company wide participation in preventing modern slavery within our supply chain. Therefore, all staff complete online training at induction and participate in a variety of online and workshop training specific to their roles in the company. This ensures that the team on our building sites are proactively looking out for signs of modern slavery through our direct and 3rd party contractors as well as those inspecting factories.

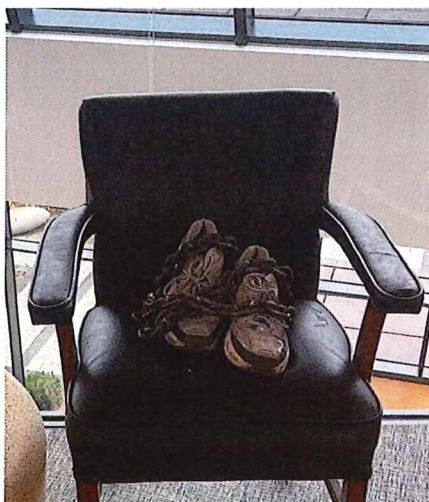
This year we have developed, with Slave free alliance, a workflow to ensure all staff can quickly and appropriately respond to potential concerns. This is attached to the Group Modern Slavery policy along with the Whistleblowing policy. Any concerns regarding unethical conduct, including modern slavery can be raised by employees, contractors and 3rd parties via our confidential and secure [Speak up form](#) any concerns are then directly raised with the appropriate team as identified through the flow chart. Communication of this new process continues to be built on.

Training and Capacity building in relation to Slavery and Human Trafficking

Training and raising awareness remain key focuses in 2024; to date our modern slavery training and capacity activities have included:

E-Learning: We will continue to invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains, Our modern slavery E- Learning module, which will be reinforced by face-to-face-training where appropriate, covers topics such as how to spot the signs of modern slavery and who to contact in the event of a potential instance of modern slavery. We encourage staff to raise any concerns that they have in relation to modern slavery. We have a robust whistleblowing policy which aims to ensure that our employees are confident that they can raise any matters of genuine

Case Study: this year we focused on not just the number of staff engaged but the impact of that engagement which is why we use large visual aids to stimulate conversation and questions to add impact & demonstrate how this topic is relevant to everyone. A old chair, worn out shoes wrapped in a thick heavy chain placed in HQ restaurant amongst other tables and chairs was used as a point to start conversations with employees during Modern Slavery week, in October 2024. Posters & flyers on the restaurant tables throughout the offices and in building site offices helped to highlight the signs to be aware of.



concern without fear of reprisals in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

Anti-slavery day awareness campaigns: Each year we share key modern slavery communication campaigns to co-inside with the anti-slavery day/week throughout all our offices. To read our previous modern slavery report: <https://www.imgroup.co.uk/modern-slavery-statement/>

Action Taken in 2024

We achieved all the key priorities that we set ourselves for 2024 as outlined in our seventh Modern Slavery statement.

We re-engaged with our tier one suppliers and reiterated our approach to modern slavery and requested they confirm agreement to our modern slavery policy. There were no specific incidents highlighted, but awareness was raised with all suppliers and many requested further information that we were able to provide.

We used Modern slavery week in October 2024 to inform all employees, throughout the globe, in different ways, relevant to their specific sector, of signs to be aware of and what to do if they had any concerns. Awareness was raised via building signage, looped video clips, and on the intranet, visual aids to encourage discussion and highlighted modern slavery policy and the need for each individual in the business to take ownership through awareness of signs to spot modern slavery.

Our collaboration with the Slave Free Alliance enabled the HR, property, business development and Compliance teams to ensure our procedures were more robust and that prompt action would be taken should there be a report or concern around slavery or any associated issues with our new detailed workflow highlighting roles and responsibilities.

- Our contract administrators successfully implemented proportionate and effective systems and controls through the supplier process. This has resulted in updated supplier forms requiring completion and acceptance of terms and conditions prior to the commencement of any contract. Existing suppliers were required to acknowledge our modern slavery policy and abide by its terms.

- We partner with Slave-Free Alliance who conducted assessments at our request, at two of our building sites, one residential and a second at a large commercial site

managed by a contractor. Although, we are pleased to report there were no concerns of

modern slavery or labour exploitation identified, SFA supported in providing recommendations to further enhance our approach on site in relation to identifying and mitigating the risk.

- By means of an updated training platform for all employees across the globe, we have an aligned approach to modern slavery and labour exploitation whereby we are able to raise the awareness and have impact across the organisation. Specific training in the local language has reinforced face to face training with relevant case studies used rather than generic ones. This has made the training more interactive and engagement rates have significantly increased.
- A detailed questionnaire has been designed with our China office and factory inspectors to ensure factory visits throughout our network and suppliers are robust and well documented to enable easier cross reference.
- Our supplier code of conduct has been rewritten with modern slavery aspects forming a central part and is being distributed to all suppliers.

2025 Strategic Goals and Focus

This section confirms our next steps and our strategic priorities for 2025. We will review our performance against these objectives and outcomes as part of our modern slavery statement for the year ending 2025/6.

We are aware of the new guidance and have completed an initial review of the guidance with the assistance of slave free alliance. We will therefore continue to gain further guidance and strengthen our approach throughout the year.

We will develop our escalation process with assistance of SFA, and aim to develop our speak up reporting form further with an independent hotline number available for employees, contractors and third party supply chain. The compliance team will work with the different business in the group to deliver the following with actions being divided into each business quarter:

Our priorities will include:



Engaging with the international transport workers federation to focus on:

- obtaining data for the shipping vessels and lines that import our goods
- review which of the vessels have collective bargaining agreements in place
- raise awareness following the review with our procurement teams in the UK & China & seek to work with our manufacturers to use vessels with agreements in place.



Develop 3rd party process' with the expanding property division by:

- update contractual & induction processes for new suppliers & Contractors
- visit all residential sites & update the site starter packs



Continue to develop and deliver training programmes for procurement colleagues on preventing & minimising risks and impacts, including modern slavery risks in our supply chain.

