

Vantage Motor Group Ltd.

Modern Slavery and Human
Trafficking Policy

Introduction

Vantage Motor Group is committed to operating its business with the highest ethical standards and respecting human rights throughout our operations and supply chains. We are resolute in our opposition to modern slavery and human trafficking in all its forms. This policy outlines our commitment to preventing these practices and upholding the dignity and rights of all workers

Definitions

- **Modern Slavery:** Modern slavery encompasses various forms of exploitation, including forced labour, human trafficking, debt bondage, and servitude. Forced labour involves working involuntarily under threat of punishment, while human trafficking involves the movement of people for exploitation. Debt bondage occurs when a person is forced to work to repay a debt, often under coercive conditions.
- **Human Trafficking:** The movement of people for the purpose of exploitation, which can include forced labour, sexual exploitation, or organ removal.

Our Commitment

We are committed to:

- Conducting our business with integrity and complying with all relevant laws and regulations pertaining to modern slavery and human trafficking.
- Integrating the prevention of modern slavery into our business practices.
- Continuously assessing and mitigating risks of modern slavery in our operations and supply chains.

- Collaborating with our suppliers, partners, and stakeholders to prevent modern slavery.
- Raising awareness of modern slavery among our employees.
- Providing a mechanism for reporting suspected cases of modern slavery.
- Taking appropriate action to address any identified instances of modern slavery.

Risk Assessment and Due Diligence

We conduct risk assessments to identify potential areas where modern slavery may occur in our supply chains. These assessments consider factors such as:

- Geographic location
- Industry sector
- Labor practices of subcontractors
- History of lab or violations

We implement due diligence procedures with our suppliers, including:

- Requesting evidence of their commitment to preventing modern slavery.
- Reviewing their anti-slavery policies and practices.
- Including contractual clauses that require suppliers to uphold the principles of this policy.

Training and Awareness

We provide training to employees and relevant stakeholders on:

- Identifying the signs of modern slavery.
- Reporting suspected cases of modern slavery.
- Understanding our company's policies and procedures on modern slavery.

Reporting

We encourage all employees and stakeholders to report any suspected cases of modern slavery using the following methods:

- Raising concerns directly with a manager or HR representative.

We will investigate all reported concerns confidentially and take appropriate action.

Remediation

If we identify a case of modern slavery within our operations or supply chain, we will take appropriate action, which may include:

- Working with the supplier to address the issue and implement corrective measures.
- Terminating the relationship with the supplier.
- Reporting the issue to relevant authorities.

Transparency and Metrics

We are committed to transparency in our efforts to combat modern slavery. We will publish an annual Modern Slavery Statement on our website, outlining our actions to prevent and address modern slavery. This statement may include metrics such as:

- The number of suppliers assessed for modern slavery risk.
- The number of training sessions conducted on modern slavery.

Continuous Improvement

We are committed to continuously improving our anti-slavery efforts. We will benchmark our practices against industry best practices and relevant frameworks. We will also collaborate with other organizations to share knowledge and best practices in preventing modern slavery.

Review and Approval

This policy is reviewed and approved by Vantage Motor Group's senior management and will be subject to periodic revisions to ensure its continued effectiveness.

Andrew Mallory, Chief Operating Officer

Tim Swindin, Chief Financial Officer

April 2025