

## Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2016.

#### Our Company

Toyota Tsusho Automobile London Holdings Ltd (the "Company") has two subsidiary companies, Toyota Tsusho Automobile North London Ltd and Toyota Tsusho Automobile South London Ltd. The Company and its subsidiaries trade under the name Jemca Car Group ("Jemca"). The Company is a wholly owned subsidiary of Toyota Tsusho Corporation located in Japan.

Jemca is a Toyota and Lexus Franchise Motor Dealer Group operating in the UK. We supply New & Used vehicles into both the Retail and Commercial sectors. We also provide Servicing, Bodyshop facilities & Parts Provision via 11 Dealerships.

#### Our principles and values

It is the Company's policy that management and employees must comply with the highest standards of business and ethical conduct in all dealings with customers, suppliers, government officials and the wider community.

As a business, Jemca maintains a relationship with different organisations in its supply chain. We are committed to improving our practices to combat slavery and human trafficking. We all have a responsibility to be alert to the risks however small in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them. This statement governs all our business dealings and the conduct of all persons or organisations with whom we contact directly or who we appoint to act on our behalf.

### Our supply chains

The Company operates in partnership with Toyota (GB) PLC as an authorised franchisee. Our supply chain includes other automotive service and parts suppliers.

We also sell the products directly to the customer, Business to Business or through a distributor network. We provide services including Finance and the sale of General Insurance products and we are authorised by the Financial Conduct Authority (FCA) to do so.

#### Our policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not

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taking place anywhere in out supply chains.

### The modern slavery risk

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery through our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015.

All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees' obligations under their contract of employment.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chain, we also recognise that we do not directly control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

- Conduct risk assessments to determine which parts of our business and which of our customers are most at risk of modern slavery, so that efforts may be focused on those areas.
- 2. Engage with our customers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their business.
- 3. Identify and monitor potential risk areas in our supply chains to ensure all customers and suppliers are adhering to the Anti-Slavery Policy.
- 4. Protect whistleblowers.

#### Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. We expect all customers and those in our supply chain to comply with our values.

We are currently in the process of sending our Modern Slavery Statement & Policy to all of our recent suppliers.

We are in the process of updating our standard terms of sale prior to issuing this Statement and considering our standard terms of purchase, so where such terms have been incorporated into the related contract and depending on the circumstances, we will have the ability to take appropriate contractual action (such as terminating or suspending the business) where we have a reasonable belief that modern slavery is occurring in the business or supply chain of the particular supplier.

# Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. We also require our business partners to provide training to their staff and suppliers.

## Actions to report modern slavery or human trafficking

Our whistleblowing policy is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Policy applies to all employees and may be found in section 21 of the Company's Employee Handbook.

In summary, the employee should approach the Manager of Human Resources. If the matter is extremely serious then a director of the Company should be approached. The nature of the complaint will determine the Company's next course of action.

Toyota Tsusho Automobile London Holdings Ltd

Makoto Ito

Chairman and CEO

30 September 2016

David Collis President