

GREVAN CARS LTD T/A OCEAN

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED 31ST DECEMBER 2018 ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015

Our Business, Structure and Supply chains

- Grevan Cars Ltd t/a Ocean is a car dealership operating in Devon and Cornwall. We sell new and used BMW cars, parts and service and repair vehicles. The company employs approximately 270 people across 3 retail centres and workshops.
- There are known high-risk activities in the motor industry ie car valeting

Our Policies

Grevan Cars Ltd works constantly to ensure that its employees and those workers sub-contracted to and those within the supply chain are engaged under the policies outlined in the Staff Handbook which is available to all employed staff. Those who are sub-contracted to the company from external suppliers will need to prove to the hiring manager that the company employed is also diligent with regard to modern slavery and has a modern slavery policy in place before contracts are agreed.

The Ocean Staff Handbook gives full details of

- Human Rights Policy
- Environmental Policy
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Health and Safety Policy
- Employee Code of Conduct

The following are available to all staff and sub-contractors either from the HR Department or are fully accessible on the Company shared drive

- CSR Policy
- Supplier Code of Conduct
- Recruitment/Agency Workers Policy

Due Diligence Processes and Steps to Manage Risks

The process of recruitment within Grevan Cars is reviewed and updated on an on-going basis. All staff hired have to prove that they have the right to work in the UK by providing necessary ID documents. If an outside company is providing workers on a sub-contracting basis, then that company has to provide to Grevan Cars evidence that those workers have the right to work in the UK and are employed according to UK law and receive at least the National Minimum Wage for the work carried out. These conditions have to be met prior to any contract being agreed or signed. The largest number of workers employed on a sub-contract basis are those employed by an outside company to provide valeting services. Individual sub-contractors, ie builders and other tradesmen, also have to provide evidence

of the right to work and be domiciled in the UK, this information is requested at pre-contract stage.

Training

Grevan Cars Ltd regularly updates management teams of the risks associated with hiring staff. Training is undertaken with those involved in recruitment to ensure that staff are aware of the risks of modern slavery and human trafficking. The Staff Handbook is updated regularly and this is available to all staff to enable reporting or whistleblowing should there be any cause for concern. If anyone within the organisation is aware that any suppliers or contractors are not implementing anti-slavery policies, then the reporting process is explained fully in the Staff Handbook.

Our Effectiveness in Eliminating Modern Slavery

All staff recruited by Grevan Cars have to prove they have a right to work in the UK. Without this documentation, they would not be hired and the HR department would report the individual to the relevant authorities to enable investigations to be made to ensure that human trafficking has not brought this person into the country.

Grevan Cars 5 Fundamental Rules

- 1 The reputation of the whole company is in the hands of each individual
- 2 If we don't look after the customer, someone else will
- 3 Always deliver what we promise
- 4 Always treat customers as we ourselves would like to be treated
- 5 Nothing is gained by winning an argument, but losing a customer

Grevan Cars Ltd Mission Statement

To be the most respected and admired service organisation in the West Country.

To succeed in achieving the above statement, the Company is constantly striving to ensure that its workforce is content, productive and supported.



Graham De Val

Group Managing Director

December 2018