

# EXEMPLARY GROUP PLC

SLAVERY AND HUMAN TRAFFICKING STATEMENT

## **Exemplary Group PLC statement on the Modern Slavery Act 2015**

In accordance with the Modern Slavery Act 2015 this statement is published based on the financial year ending 2019. It outlines steps taken by Exemplary Group PLC and its operating companies to prevent any possibility of modern slavery and human trafficking taking place within its supply chains and day to day operations.

### **1. Our Structure**

Exemplary Group PLC is a non-trading entity which has two subsidiary companies, these are, Oracle Asset Finance Ltd and Lawton Brook Ltd.

Oracle Asset Finance is the number 1 UK funder for prestige, sports and classic cars. We have the customer's experience at the heart of what we do. It's important to ensure they get first class outcomes, which is where we embed our focus. We have two office locations, one based in Knaresborough, North Yorkshire and one in London. Oracle Finance has approximately 60 employees.

Established in 1996, Lawton Brook Ltd is an independent motor retailer, specialising in luxury, 4x4 and high-performance vehicles. All the stock is hand-picked to ensure we only offer the very best vehicles from the world's leading marques. The average number of people employed as at the 31 March 2019 by Lawton Brook stood at 10 people.

Both companies operate within the UK.

### **2. Supply Chains**

To support the day to day functions of Oracle Asst Finance Limited and Lawton Brook Limited we have a range of local suppliers and contractors who we trust and have long term relationships with. This enables us to have open discussions with them to ensure we share the same ethical and legal trading principles. Whilst the majority of suppliers are local to us, we do use alternatives based nationwide. We do not have the resource to carry out audit visits on all suppliers, so we rely on them to be honest in our discussions. However, we will continue to review this policy and undertake the necessary actions including moving away business away from suppliers should we become aware of any doubts about their compliance.

### **2. Policies to support our statement**

We have several policies in place that ensure and confirm that we will not tolerate abuse of human rights within the workplace and demonstrate that we will promote ethical and legally compliant business conduct. These policies include, Anti Modern Slavery, Bullying and Harassment, Grievance, Whistleblowing, Equal Opportunities and Health and Safety.

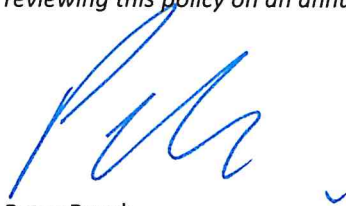
### **3. Additional Measures**

We are committed to ensuring we reassess and respond to areas where we may become vulnerable to modern slavery. In addition to the above mentioned policies, we will also carry out the following:

- Ensure all employees have a written contract of employment
- Ensure all employees are legally able to work in the UK

- Provide information to all new recruits on their statutory rights including, sick pay, holiday pay and any other benefits they may be entitled to
- Ensure compliance with all government legislation with reference to National Minimum Wage and Equal Pay Act
- Use reputable suppliers which have measures in place to identify their own risks of modern slavery
- Promote understanding of the risks of modern slavery in our business and supply chains, by delivering training to management and key members of staff.

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 has been approved by the Exemplary Group PLC director. It is reflective of the financial year ending March 2019. We are committed to reviewing this policy on an annual basis.*



Peter Brook  
Managing Director  
Exemplary Group PLC  
April 2019