



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

INTRODUCTION

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1st April 2019 to 31st March 2020.

The statement sets down J. Rose (Tyres) Limited commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

ORGANISATIONAL STRUCTURE & SUPPLY CHAINS

This statement covers the business activities of J. Rose (Tyres) Limited which are as follows:

J. Rose (Tyres) Limited (inc. subsidiaries Kirkby (Tyres) Limited and Kirkby Tyres (Ireland) Limited operate as Tyre and Wheel Wholesalers based in the UK and Ireland.

The group import tyres and wheels as wholesalers and distribute to the original equipment and replacement markets.

The Company currently operates in the following countries:

United Kingdom
Republic of Ireland

HIGH RISK ACTIVITIES

The following activities are co risk of modern slavery or human trafficking:
Purchase of Tyres from countries at a higher risk of modern slavery (global slavery index):

India 53/167 Prevalence Index Rank

China 111/167 Prevalence Index Rank

Thailand 23/167 Prevalence Index Rank

Vietnam 77/167 Prevalence Index Rank

Turkey 48/167 Prevalence Index Rank

Poland 100/167 Prevalence Index Rank

Israel 90/167 Prevalence Index Rank

Responsibility for the Company's anti-slavery initiatives is as follows:

Policies: The Company Secretary is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the Company.

Risk assessments: The Company Secretary is responsible for risk assessments in respect of human rights and modern slavery.

Due diligence: The Company Secretary is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

TRAINING

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires the senior management team to engage in understanding the requirements around the Modern Slavery Act.

POLICIES

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations

Whistleblowing policy - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.

Employee Team Handbook - This handbook sets down the actions and behaviour expected of employees when representing the Company.

DUE DILLIGENCE PROCESSES FOR SLAVERY & HUMAN TRAFFICKING

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier.

PERFORMANCE INDICATORS

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all relevant staff to have completed training on modern slavery by 31/12/2020.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Company's board endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Robin Walls

Position: Company Secretary

Date: 04/06/2020