

Grevan Cars Ltd t/a Ocean

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out Grevan Cars Ltd t/a Ocean actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the year 1st January 2025 to 31st December 2025.

As part of the Motor Industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and its supply chains.

Structure and supply chains

Grevan Cars Ltd t/a Ocean is a franchised motor dealer consisting of 3 retail centres in Devon & Cornwall, together with a body shop and various workshops. Our core activities are the sale, service and repair of motor vehicles along with their associated parts.

Our supply chains include a variety of national, local and international suppliers to source goods, services and equipment for the operation of our business. In particular we work principally with vehicle manufacturers from whom we obtain our principal products, motor vehicles and aftersales parts. Therefore, we would refer any interested parties to view the Modern Slavery Statement of the relevant supplier(s) that we represent.

Policies on Modern Slavery

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of the business. Our policies reflect 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 taking place anywhere in our supply chains.

We have in place a number of policies to ensure that we are conducting business in an ethical manner:

- Recruitment
- Whistleblowing
- Anti-Bribery and Corruption
- Equality and Diversity
- Bullying & Harassment

- Employees Code of Conduct
- Corporate Hospitality

Due Diligence

Grevan Cars Ltd t/a Ocean continues to take its responsibilities seriously and whilst building on the actions already in place, we will continue to look for more ways to fortify our method of identifying and mitigating the risk of modern slavery.

Our Approach:

- Continue to assess the risk of slavery and trafficking in our supply chains.
- Continue to provide training for management to enable them to identify, assess, mitigate and report specifically on modern slavery.
- Publish our Modern Slavery Statement on our HR information system accessible to all employees.
- Continue to publish our whistleblowing policy in our company handbook.
- Ensure modern slavery posters that give an overview of the signs to look out for, including how employees can report concerns regarding modern slavery are displayed in our employee areas throughout our company.

Risk Assessments

Our sources of supply are predominantly from the United Kingdom and Europe. As such, we do not view this as a significant risk and, as a result we have taken no further steps to assess and manage that risk. However, should a risk be identified, we aim to work with our colleagues and suppliers to ensure collaboration to remedy or mitigate such risks.

We allow all individuals who work or provide services to us the right to freely choose employment and, the right to associate freely with other individuals. We offer an environment which is free from harassment and unlawful discrimination. We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation. We do not engage in forced or involuntary labour and have a zero-tolerance approach to the same, meaning we do not tolerate any of our suppliers engaging in such conduct.

Measuring Effectiveness

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- A review of our employment terms and conditions and recruitment policy.
- Use of labour monitoring and payroll systems to determine compliance with Living/Minimum wage rates and Working Time Regulations.
- Identify high risk within our supply chain.

Training

We communicate this statement along with guidance on the awareness of modern slavery and how to identify victims to all managers ensuring a high level of understanding of the risks of modern slavery and human trafficking in supply chains.

Also, the organisation has raised awareness of modern slavery issues by putting up posters in the employee areas.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015.
- what external help is available, for example through the Modern Slavery Helpline and how to report concerns regarding Modern Slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Grevan Cars Ltd t/a Ocean slavery and human trafficking statement for the financial year detailed above.



Graham De Val
Group Managing Director