

IMO Car Wash Group Limited

Slavery and Human Trafficking Statement

IMO structure and business

We are a developer and operator of car wash sites. We are part of the ICWG group of companies. In the United Kingdom, our car wash sites are operated by independent operators under contract with one of our subsidiaries, Anduff Car Wash Ltd, under the IMO and ARC car wash brands. Our business is organised into 253 operating sites across the United Kingdom.

The senior management team of IMO Car Wash Group Ltd comprises Thomas Mangas, Jonathan Booth, Jeff Lasher and Peter Davies. The Managing Director of Anduff Car Wash Ltd and the UK business is Tim Walton.

Our supply chains

Our supply chains include chemical and equipment suppliers, maintenance contractors, brush manufacturers and self-employed car wash operators.

We expect organisations and individuals from whom we procure products and services and other companies we engage with to ensure their goods, materials and labour related supply chains to be fully compliant with the Modern Slavery Act 2015 and free from ethical ambiguities.

Individuals with evidence of non-compliance with the Modern Slavery Act in connection with our supply chains are encouraged to follow the reporting procedure outlined in our Whistleblowing Policy.

Our policy 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 and Human Trafficking 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 taking place anywhere in our supply chains. The policy is available on our website at www.imocarwash.com/media/5750/anti-slavery-and-human-trafficking-policy-2019.pdf

Due diligence processes for slavery and human trafficking

The Board is responsible for reviewing the risk of our commercial activities to understand if there are any potential risks where Modern Slavery could occur.

Having risk assessed our business, the Board has identified that there is low risk of Modern Slavery within the IMO business itself. We have identified that many non-EU nationals work in the car wash industry generally and that there is therefore potential for human trafficking and/or forced labour at car wash sites. Our car wash sites are operated independently by self-employed operators. We believe that our sites have a notably lower risk than hand car wash operations because the level of manual labour involved at our car wash sites is far lower than at hand car wash sites. However, we recognise that that risk may still exist within the operation of our car wash sites. The self-employed operators of our car wash sites engage staff directly and IMO has no direct oversight or control over the employment practices of those operators. We have ensured

that our contracts with operators require them to comply with the Modern Slavery Act 2015 and we have the right to terminate our contract with the operator if they fail to comply.

Our Whistleblowing Policy also encourages reporting of any concerns and commits to protect employees from any retaliation for reporting a concern in good faith, even if that concern is eventually shown to be unjustified.

We have checked the Modern Slavery Statements of our suppliers, where required, and we will continue to monitor potential risk areas in our supply chains.

All of our employees receive the statutory employment rights to which they are entitled and we verify that all of our employees have the legal right to work in the UK. Our employees are provided with safe working conditions and we have the expectation that they will be treated at all times with dignity and respect.

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 are providing training to relevant staff. All Directors have been briefed on the subject.

Our effectiveness in combating slavery and human trafficking

We have:

- Agreed responsibilities for this policy and statement and received unanimous support from our Senior Management team;
- Raised awareness to key members of staff who regularly interact with our supply chain and contractors;
- Incorporated the Anti-Slavery and Human Trafficking Policy in our standard set of Company policies and as part of our induction programme for all new employees;
- We have imposed in new contracts with suppliers and contractors provisions for termination in the event of breach of modern slavery or human trafficking compliance.

We have the following policies in place for employees:

- Anti-Slavery and Human Trafficking Policy
- Equal Opportunity Policy.
- Grievance Policy.
- Whistleblowing Policy.

Employees are reminded of the policies from time to time and notified of any updates.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the anti-slavery and human trafficking statement of IMO Car Wash Group Ltd and its UK subsidiaries for the financial year ending 31 December 2018. The Board of IMO Car Wash Group Ltd has approved this statement.



Thomas Mangas

Chief Executive Officer

On behalf of IMO Car Wash Group Limited

Date: March 11, 2019