

BLACKCIRCLES.COM LIMITED

MODERN SLAVERY ACT 2015

ORGANISATION'S STRUCTURE

Blackcircles is a leading online tyre retailer to consumers primarily in the UK. Blackcircles is a part of the Michelin Group and our ultimate parent company is Compagnie Générale des Établissements Michelin. Headquartered in Clermont-Ferrand, France, the Michelin Group is present in more than 170 countries, has 110,000 employees and operates over 60 production plants in 17 different countries.

OUR SUPPLY CHAIN

Our supply chain primarily involves the fitting and procurement of tyres.

OUR POLICIES

We are committed to implementing and enforcing effective systems and controls to ensure that neither modern slavery nor human trafficking exist in our supply chains or in any part of our business. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships.

We endeavour to:

- Identify, assess and monitor potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Protect whistle blowers

We have a zero tolerance approach to modern slavery and human trafficking.

We remain committed to further developing our compliance programme to ensure that our supply chains and employees are fully engaged and involved in this compliance programme.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2018.



CEO Date: 30th January 2019