

MODERN SLAVERY ACT STATEMENT

FOR THE FINANCIAL YEAR ENDED 31ST DECEMBER 2025

Introduction

This statement, pursuant to Section 54 (1) of the Modern Slavery Act 2015, sets out Gates Group's actions to understand all potential modern slavery risks related to its business and the steps that have been taken in the last financial year and are aimed to ensure that there is no slavery or human trafficking in its own business and supply chains.

Policy Statement

Modern slavery is a heinous crime and a violation of fundamental human rights, which is used as a brutal means to maximise profitability, by producing goods and services at ever lower costs with little regard for the horrendous impact this has on individuals and the deprivation of their liberty. It takes numerous forms, such as slavery, servitude and forced or compulsory labour, as well as human trafficking, sexual exploitation, emotional and physical abuse.

Gates Group recognises that businesses have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (include wage and work hours), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications.

We have a zero-tolerance and robust approach to modern slavery and are absolutely committed to acting ethically and with transparency and integrity in all our business dealings and relationships. We will implement and monitor effective systems, due diligence, and controls to ensure that our group and our supply chains are free from slavery, human trafficking, and exploitation, in compliance with the Modern Slavery Act 2015.

We expect the same high standards from all our suppliers, contractors and other business partners and expect that our suppliers will hold their own supply chain accountable to these same exacting principles.

Organisational Structure and Supply Chains

This statement covers the following entities, that operate only in the UK, and their business activities within the Gates Group:

Gates Group Limited (03087549)

Group parent and holding company. Long established property investment company, with a diverse portfolio of freehold commercial and residential property.

Frank G. Gates Limited (00245843)

Family owned automotive retailer operating as Authorised Dealers for numerous brands (including Ford, BYD, OMODA|JAECOO, Peugeot, Leapmotor and Geely) across multiple business locations in London, Essex and Hertfordshire. Our business consists of the sale of passenger and commercial motor vehicles, vehicle parts and consumables, and aftersales servicing and repairs.

The aforementioned group companies commit to annually review and publish its Modern Slavery Statement to set out specific actions and aims made by our organisation.

Our supply chains are predominantly UK based and are formed with a limited number of vehicle and parts suppliers, given our commitment to Ford Motor Company at most of our dealerships. Alternative parts and consumables supplies, for vehicle servicing and repair work, are sourced from well-established UK companies or branches and subcontractors are either well known or highly recommended to us. Working in alliance with outsourced procurement specialists and group purchasing organisations means that we can rely upon expertise and robust procurement processes in most areas.

Whilst respecting environmental and human rights issues in the supply chain is ultimately our supplier's responsibility, we seek to work with our key suppliers to develop long term and open relationships and ensure that we are aware of their ethical codes and policies and communicate our own expectations regarding modern slavery.

Responsibility

The Board of Directors have overall responsibility for ensuring its anti-slavery initiatives and that our policy complies with our legal and ethical obligations.

The Board have primary day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, responding to any queries, and auditing internal control systems and procedures to ensure that they are effective in countering and remediating the risk of modern slavery.

Line managers are accountable for ensuring that those reporting to them understand and comply with this policy (and those relevant policies listed below) and are given adequate and regular training on the issues of modern slavery, as they become available.

All management are responsible for investigating any allegations of modern slavery within the organisation or our supply chains or escalating any such incident to a Board Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Gates Group is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Relevant Policies

We have documented the following policies and guidance in our Employee Handbook, which are available to all staff and can be accessed by third parties on request by contacting hr@gates.co.uk. Our policies are reviewed annually to ensure we remain compliant.

Employee Code of Conduct - The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Modern Slavery Statement – The statement supplements this document and outlines our commitment to ensuring that there is no slavery or human trafficking in any part of our business or supply chain, as well as the importance of reporting any concerns to management.

Whistleblowing Policy - The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

We commit to maintain these policies and developing the following in the coming years:

- Ethical Procurement Policy – To set out the standards and code of conduct for all suppliers, to ensure that thorough due diligence is undertaken across their supply chains to ensure compliance to UK legislation.
- Agency Workers Policy – To ensure that our organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from that agency.

Due Diligence Processes

Our organisation undertakes due diligence and reviews which include:

- Robust recruitment controls to verify the identity of any prospective employee and their Right to Work documentation and make pre-employment checks where relevant.
- Assess internal processes to avoid placing undue demands on suppliers that might lead them to breach human rights, such as high-pressure deadlines and late payments.
- Build longstanding relationships with reputable business partners, who share our expectations of ethical business behaviour.
- Periodically review modern slavery and human trafficking statements of our key suppliers.
- Systems in place to encourage the disclosure of concerns within our business and supply chain and the protection of those that do so.

We commit to implement additional procedures in the coming years as follows:

- Map the supply chain to assess particular product or geographical risks of human trafficking and modern slavery.
- Introduce modern slavery questionnaires for existing and new suppliers, to collect information relevant to compliance with the legislation.
- Review of our existing procurement policy, to incorporate certification against modern slavery and human rights violation.

Performance Indicators

We do not believe that our key performance indicators make our business or supply chain vulnerable to modern slavery by placing unnecessary or unrealistic stress on our employees or suppliers.

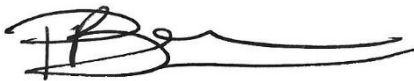
Training and Awareness

All our staff are briefed on our commitment to understanding the risks of modern slavery and zero-tolerance approach as part of their induction process. Our Modern Slavery Statement and Whistleblowing Policy are presented in our Employee Handbook and reviewed accordingly by all employees. Senior management are aware of the relevant legislation, our company obligations and changes in business processes or regulatory guidance.

We commit to following improvements in the future:

- Communicating our ethical standards and expectations of business partners throughout our supply chain, including the termination of relationships if they are found to have breached this policy.
- Mandatory employee training on the Modern Slavery Act 2015 for all employees, to include guidance on how to identify the signs and assess the risks of slavery and human trafficking.

This statement is made in accordance with Section 54 (1) of the Modern Slavery Act 2015 and was reviewed and approved by the Board of Directors on 26th June 2026.



Phil Benson

Finance Director

Date: 26th June 2026