Document title: Modern Slavery Statement Published date: Oct 2024. Revision date/status: 2026	Carbase

1. Our Commitment

1.1. Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour; and human trafficking. Modern Slavery is a crime and violation of fundamental human rights. It takes various forms encompassing slavery, servitude, forced labour and human trafficking.

1.2. We are committed to:

a) Acting ethically and with integrity in all our business dealings and relationships;
b) And undertaking appropriate due diligence to identify and assess potential risk areas and mitigate the risk of slavery and human trafficking occurring.

1.3. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

1.4. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's modern slavery statement for the financial year ending 31st March 2025.

2. Our Business, Structure and Supply Chains

2.1. Carbase Vanbase is a privately-owned company with over 250 employees working across 4 retail sites in the South-West region of the UK plus a dedicated preparation centre. The business operates as a used vehicle supermarket which involves purchasing and selling cars and vans along with ancillary products, and the provision of vehicle servicing, MOT, repairs, and maintenance.

2.2. Carbase Vanbase has dozens of regular suppliers across sectors including vehicle purchasing, finance, motor parts, valeting and various forms of vehicle preparation. Most of our key suppliers are large UK companies which have to adhere to the same strict regulations on Modern Slavery. The reputational risk for them is considerable and should provide a strong incentive to ensure their own policies are properly implemented.

3. Our policy on Slavery and Human trafficking

3.1. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

3.2. Our Modern Slavery Policy reflects our commitment above, namely: acting ethically and with integrity in all our business relationships and implementing and enforcing

effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

3.3. We ensure that our workers are not exploited, are safe and that all relevant employment (including wage and work hour), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications.

4. Due Diligence Processes for Slavery and Human Trafficking

4.1. As part of our initiative to identify and mitigate risk we have a number of procedures in place.

a) We include the following statement in our procurement processes with suppliers - "Modern Slavery Act: Carbase has a zero-tolerance policy towards human trafficking and modern-day slavery. As such we do not and will not support any business who does not comply with the Modern Slavery Act 2015. By participating in this bid you are confirming that your company is fully compliant with this. Failure to adhere to this will result in your Bid being rejected and possible exclusion from further business";
b) We have a Whistleblowing Policy in place;
c) We have a Recruitment & Selection Policy and Procedure in place;
d) We have clear Codes of Conduct in place;
e) We have a procedure whereby we check and reference all employees. This includes face to face interviews, checking their identification and rights to work documentation, and carrying out other relevant pre-employment checks;
f) We require our contractors, including Employment Agencies, to perform right to work checks on their staff as part of their own due diligence;
g) To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company communicates this policy and its meaning to all staff. A copy of the company's Modern Slavery Policy is available electronically on the Company's intranet, along with a copy of the Modern Slavery Act 2015;
h) Employees are fully aware of the obligations under the Modern Slavery Act 2015 and are expected to report their concerns, and for management to act upon them.

5. Supplier adherence to our values

5.1. We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

6. Training

6.1. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

6.2. The Senior Leadership Team endorses this policy statement and is fully committed to

its implementation. This Modern Slavery Statement for the financial year ending 2025 has been approved and authorised by:

Name: David Lloyd

Position: Head Of People, Learning and Culture