



Modern Slavery and Human Trafficking Statement

John Banks Group

Financial Year: 2026 - 1 January 2026 – 31 December 2026

Published: 3 March 2026

1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that John Banks Group (“the Company”) has taken during the above financial year to ensure that slavery and human trafficking are not taking place in our business or supply chains.

We are committed to acting ethically and with integrity in all our business dealings and relationships. We implement and enforce effective systems and controls to safeguard against modern slavery within our organisation and supply chains.

2. What is Modern Slavery?

The Modern Slavery Act 2015 identifies four key offences:

Slavery

Exercising powers of ownership over a person.

Servitude

The obligation to provide services is imposed by the use of coercion.

Forced or Compulsory Labour

Work or services are exacted from a person under the menace of penalty and for which the person has not offered themselves voluntarily.

Human Trafficking

Arranging or facilitating the travel of another person with a view to exploitation.

This policy and statement address all four categories.

3. Our Business

John Banks Group is a UK-based automotive dealership group operating across multiple sites in the East of England. We employ colleagues across vehicle sales, aftersales, parts, administration, and management functions. We recognise that while our sector is not traditionally classified as high risk, elements of our supply chain and outsourced services may present potential exposure to modern slavery risks.

4. Our Commitment

We are committed to:

- Preventing exploitation and human trafficking.
- Protecting our workforce and reputation.
- Acting responsibly and transparently.
- Taking a zero-tolerance approach to slavery and human trafficking.

We expect the same high standards from all contractors, suppliers, and business partners.

5. Responsibility for this Policy

5.1 Board-Level Responsibility

Ultimate responsibility for this statement and compliance with the Modern Slavery Act 2015 rests with the Chief Executive and Board of Directors.

5.2 Management Responsibilities

Managers must:

- Be approachable and responsive to concerns.
- Remain alert to indicators of modern slavery.
- Escalate concerns appropriately.
- Ensure recruitment and supplier processes are followed correctly.

5.3 All Employees

All employees must:

- Comply with this policy.
 - Avoid turning a blind eye to suspected exploitation.
 - Raise concerns promptly through appropriate channels.
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6. Risk Assessment

The principal areas of potential risk include:

- Supply chains (including vehicle preparation, parts supply, outsourced services).
- Recruitment via agencies.
- General recruitment.
- Cleaning and facilities contractors.
- Corporate hospitality and events.
- Any outsourced **activities, particularly where overseas elements exist.**

Risk is managed through structured procedures, supplier due diligence, recruitment checks, and training.

7. Due Diligence and Procedures

7.1 Supply Chain Management

We:

- Communicate a zero-tolerance approach to slavery to our suppliers.
- Seek to include anti-slavery clauses within supplier contracts.
- Require suppliers to confirm compliance with UK law.
- Conduct proportionate due diligence where appropriate.
- Maintain visibility of key suppliers and service providers.

Where concerns arise, we will investigate and take appropriate action, which may include termination of contracts.

7.2 Recruitment Practices

7.2.1 Recruitment Agencies

We:

- Only use reputable, approved recruitment agencies.
 - Carry out background and reputation checks before approval.
 - Require confirmation that right-to-work checks have been conducted.
 - Require assurance that workers have not paid recruitment fees.
 - Review approved agencies regularly (at least every three years).
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7.2.2 Direct Recruitment

We:

- Provide all employees with a written contract of employment.
 - Ensure no direct or indirect recruitment fees are charged to workers.
 - Conduct compliant Right to Work checks in line with UK Home Office guidance.
 - Verify identity and address documentation.
 - Provide all new recruits with information regarding statutory rights, including:
 - National Minimum Wage / National Living Wage
 - Holiday entitlement
 - Statutory Sick Pay
 - Family-related leave rights
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8. Identifying Modern Slavery

There is no single profile of a victim. Indicators may include:

- A person not in possession of their passport or identification.
- Someone appearing coached or instructed by another.
- Allowing others to speak on their behalf.
- Being dropped off and collected from work consistently.
- Withdrawn or fearful behaviour.
- Limited freedom of movement or communication.
- Isolation from wider social interaction.

This list is not exhaustive.

Where suspicions arise, concerns must be reported.

9. Reporting Concerns

Immediate Danger

If someone is in immediate danger, call 999.

Non-Emergency Concerns

Concerns should be reported to:

- A Line Manager
- Senior Management
- Human Resources

Where appropriate, concerns may also be reported via the company grievance or whistleblowing process.

We will not tolerate retaliation against any employee who raises concerns in good faith.

10. Training

We provide:

- Targeted training to staff involved in recruitment and supply chain management.

- General awareness training for all staff.
 - Policy updates where changes occur.
 - Periodic refresher training as appropriate.
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11. Monitoring and Review

We:

- Review this policy at least annually.
 - Assess emerging risks.
 - Monitor recruitment and supplier compliance.
 - Update procedures where necessary.
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12. Effectiveness

To measure effectiveness, we:

- Monitor recruitment compliance.
- Review supplier terms.
- Track training completion.
- Investigate and record any concerns raised.

To date, no substantiated cases of modern slavery have been identified within our business.

13. Approval

This statement has been approved by the Board of Directors of John Banks Group and is signed on its behalf.

Signed:

Melanie Banks-Browne

Chief Executive

John Banks Group

Date: 3 March 2026

Next Review Due: March 2027

