

# **Slavery and Human Trafficking Statement for Border Holdings (UK) Ltd (incorporating Allmakes PR2 4x4 Ltd)**

**Financial Year Ended 31 March 2026**

**Reporting Period: 1 April 2025 to 31 March 2026**

## **Introduction**

Border Holdings (UK) Ltd remains committed to preventing modern slavery and human trafficking within our operations and supply chains. We recognise our responsibility to conduct business ethically and responsibly and to take proportionate steps to identify, assess and mitigate the risk of modern slavery within our business activities and supply chains.

This statement sets out the steps taken by Border Holdings (UK) Ltd and its Group operations during the financial year ended 31 March 2026 and is published in accordance with Section 54 of the Modern Slavery Act 2015, Transparency in Supply Chains.

## **Our Business and Structure**

Border Holdings (UK) Ltd is a leading independent wholesaler of Land Rover parts and accessories, supplying more than 1,000 stockists through established global commercial partnerships.

For more than 40 years, the business has remained privately owned. Our principal operations comprise Britpart in Shropshire, Border Cold Stores in Avonmouth and, since 2019, Allmakes 4x4 PR2 Ltd in Oxfordshire.

During the financial year ended 31 March 2026, Group turnover, including Allmakes, was approximately £155.4 million, of which Britpart accounted for approximately £86 million of external turnover. As at 31 March 2026, the Group employed 454 people across its operations.

The manufacture and distribution of motor vehicle parts under the Britpart and Allmakes brands represents the substantial majority of our business activities. Other activities include farming, cold storage provision and property rental. These activities represent only a small proportion of the Group's overall operations. We recognise that the nature and level of modern slavery risk vary between these activities and assess them accordingly as part of our overall risk management approach.

Our dedicated delivery fleet serves customers throughout the UK, Ireland and parts of Europe, while international customers are supported through established relationships with specialist freight forwarders and shipping providers.

We are committed to conducting business responsibly, treating our employees fairly and maintaining strong and transparent relationships with our suppliers, customers and other stakeholders.

## **Our Supply Chain**

Our supply chain includes manufacturers and suppliers of automotive parts, accessories and associated products in the UK and overseas, together with providers of freight, logistics and other goods and services required to support our operations.

A significant proportion of our goods continues to be sourced from established suppliers and manufacturers with whom we have longstanding business relationships. Many of our key suppliers are recognised Tier 1 OEM suppliers within the automotive marketplace.

We recognise, however, that an established commercial relationship does not in itself eliminate modern slavery risk. Modern slavery and human trafficking considerations therefore form part of our supplier assessment and approval arrangements.

## **Policies and Governance**

Border Holdings (UK) Ltd maintains policies and procedures intended to promote ethical conduct and protect the rights and welfare of those working within our organisation.

Within our own operations, we maintain appropriate employment practices, comply with applicable National Minimum Wage and National Living Wage requirements, promote safe working conditions and respect employees' statutory employment rights.

Our Whistleblowing Policy provides employees with a route through which concerns, including concerns relating to modern slavery, exploitation or other unlawful practices, can be raised and investigated.

Within Britpart, our Conditions of Purchase expressly require suppliers to comply with applicable anti-slavery and human trafficking legislation, including the Modern Slavery Act 2015.

### **Risk Assessment**

We recognise that modern slavery risks can vary according to factors including geographical location, industry sector, type of labour used and the nature and complexity of supply chains.

Given the nature of our principal business, potential areas of greater exposure include overseas manufacturing and sourcing, particularly where goods originate from geographical regions or sectors associated with increased risks of labour exploitation.

We also recognise that the use of third-party labour providers can introduce additional risks and therefore consider recruitment arrangements as part of our overall approach to identifying and managing modern slavery risk.

### **Farming and Agricultural Activities**

We recognise that agriculture can present an increased risk of labour exploitation and modern slavery, particularly where businesses rely upon seasonal, temporary or agency labour.

Farming represents only a very small part of the Group's overall activities and employs approximately four to five people. Our farming operation does not use agency or temporary labour, with workers employed directly by the Company. This reduces some of the principal labour-related risks commonly associated with the sector.

Nevertheless, our farming activities remain within the scope of our modern slavery risk assessment and employment controls.

### **Due Diligence and Supplier Controls**

Modern slavery and human trafficking considerations form part of our new supplier assessment and approval arrangements. The precise processes used vary between our operations, reflecting their individual purchasing and compliance arrangements.

At **Allmakes**, the documented new stock supplier approval process specifically asks suppliers whether they regularly check their supply chains for compliance with the Modern Slavery Act, whether they have company standards and policies addressing human trafficking and slavery within their workforce and supply chain, and whether relevant training records are maintained.

The Allmakes process also incorporates a **Compliance Manager risk assessment and Purchasing Manager approval**, together with the collection of relevant supporting certificates and statements and the recording of the final supplier approval decision.

Its documented Stock Supplier Assessment Procedure considers a range of factors when evaluating new suppliers, including country of origin, the results of the supplier's A05 assessment, the Compliance Manager risk assessment and the availability of relevant test and compliance certification. Supplier visits may also form part of the assessment where relevant.

At **Britpart**, modern slavery considerations form part of supplier approval arrangements. Britpart's Conditions of Purchase provide an additional contractual control by expressly requiring suppliers to comply with applicable anti-slavery and human trafficking legislation, including the Modern Slavery Act 2015.

Supplier assessment and approval arrangements operate within our wider ISO 9001 quality management systems and associated documented procedures.

Where information obtained through supplier assessment gives rise to a concern, this can be considered as part of the supplier risk assessment and approval process and escalated as appropriate. Depending upon the nature and seriousness of the concern, further information or corrective action may be sought and, where appropriate and legally and contractually possible, the trading relationship may be suspended or terminated.

Any serious or urgent concerns would be escalated appropriately and, where necessary, reported to the relevant authorities.

### **Recruitment and Agency Labour**

Border Holdings (UK) Ltd continues to favour direct recruitment wherever practicable, providing greater visibility and control over recruitment and employment practices within our own operations.

During the reporting period, Britpart did not routinely engage temporary agency workers. Our farming operation does not use temporary or agency labour. Allmakes made limited use of agency labour, principally on a temporary-to-permanent basis.

We recognise that third-party labour arrangements can present additional worker exploitation and modern slavery risks. The limited nature of our agency use, together with our preference for direct employment and transitioning suitable temporary workers into permanent employment, assists in reducing our exposure to these risks.

We will continue to keep the use of agency labour and associated recruitment arrangements under review.

### **Training and Awareness**

Employees are provided with access to relevant Company policies and information through our HR software system, including information relating to modern slavery and human trafficking.

We recognise that modern slavery awareness is particularly relevant to employees working in areas such as HR, Purchasing, Compliance and operational management, whose roles may provide greater opportunities to identify potential concerns.

During 2026, the Company commenced development of a new internal training programme incorporating **Modern Slavery and Human Trafficking alongside wider Business Financial Crime awareness**.

The programme is intended to strengthen employees' understanding of the potential indicators of modern slavery, the risks that can arise within business operations and supply chains, and the appropriate routes for reporting and escalating concerns.

The Home Office's Modern Slavery and Victim Identification Guidance will continue to be made available to employees through our HR system.

### **Monitoring Our Effectiveness**

Border Holdings (UK) Ltd recognises that the absence of reported incidents alone is not sufficient to demonstrate the effectiveness of measures designed to prevent modern slavery.

We therefore consider the operation of our supplier assessment and approval processes, recruitment practices, internal reporting mechanisms and relevant training and awareness activity when reviewing our arrangements.

During the financial year ended 31 March 2026:

- modern slavery considerations continued to form part of new supplier assessment and approval arrangements;
- supplier assessment processes provided documented information relevant to identifying potential modern slavery risks;

- Britpart's anti-slavery and human trafficking provision remained within its Conditions of Purchase;
- no instances of modern slavery were reported to or identified by the Group through its existing reporting, due diligence or supplier assurance processes; and
- work commenced on strengthening employee awareness through the development of a new Business Financial Crime and Modern Slavery training programme.

We recognise that the businesses within the Group have developed their supplier controls in different ways. Our ongoing review provides an opportunity to identify effective practices within each operation and consider where these could appropriately be shared or adopted more widely.

### **Our Priorities for 2026–2027**

During the next reporting period, Border Holdings (UK) Ltd intends to build upon its existing arrangements by:

- progressing the development and implementation of the new Modern Slavery and Business Financial Crime training programme;
- reviewing training and awareness requirements, with particular consideration given to employees whose roles may provide greater opportunities to identify potential concerns;
- maintaining modern slavery considerations within new supplier assessment and approval processes;
- reviewing supplier due diligence arrangements across the Group to identify opportunities to share and adopt good practice, improve consistency where appropriate and introduce proportionate, risk-based enhancements;
- considering whether additional due diligence may be appropriate where suppliers present potentially higher geographical, sector or labour-related risks;
- continuing to monitor the use of agency labour and associated recruitment arrangements; and
- considering how relevant training, supplier due diligence activity, concerns and resulting actions can be recorded more consistently to provide better evidence of the operation and effectiveness of our controls.

We remain committed to promptly and thoroughly investigating any concern relating to modern slavery, human trafficking, forced labour or worker exploitation and to taking appropriate action where concerns are substantiated.

Border Holdings (UK) Ltd will continue to work with its employees, suppliers and business partners to promote responsible business practices and reduce the risk of modern slavery within our operations and supply chains.

### **Approval**

This statement has been approved by the Board of Directors of Border Holdings (UK) Ltd and is signed on its behalf by the Managing Director.



**Signed:** Paul Moore-Myers

**Managing Director**

**Date:** 5<sup>th</sup> October 2026