

INTRODUCTION

This statement sets out JKC Specialist Cars Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year from 1st January 2025 to 31st December 2025.

As part of the motor industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

WHAT WE MEAN BY MODERN SLAVERY

Our supply chain is primarily based in the UK and Ireland, and the Organisation currently operates within these jurisdictions.

Modern slavery is a crime and a violation of essential human rights. The Organisation considers that modern slavery encompasses:

Human trafficking;

Forced work through mental or physical threat;

Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;

Being dehumanised, treated as a commodity, or being bought or sold as property;

Being physically constrained or having restrictions placed on freedom of movement.

ORGANISATIONAL STRUCTURE

JKC is a family-owned BMW & MINI vehicle retailer established over 40 years ago. Over the past few years, we have gained recognition as 'BMW Retailer of the Year' and 'BMW Customer Champion'.

Our success has been built by every team member working together and contributing to our one-team ethos. We strive to deliver an exceptional customer experience; our colleagues are highly trained, enthusiastic, knowledgeable, and driven to deliver our fundamental commitment to our customers; we strive to get it the right the first time and make each and every interaction special.

Our ultimate aim is to be considered the best company to work for in the industry and the best company to do business with.

RESPONSIBILITY

Responsibility for the organization's anti-slavery initiatives is as follows:

Policies: The Directors and Senior Management Team are responsible for reviewing and implementing policies relating to ethical business practices, modern slavery and human trafficking.

Risk Assessments: The Organisation assesses the risk of modern slavery and human trafficking within its business operations and supply chain through supplier selection, supplier due diligence, and ongoing review of business relationships. Particular consideration is given to the nature of services provided, geographical location and any identified risk factors.

Investigations and Due Diligence: The Management Team is responsible for investigating any concerns raised regarding potential modern slavery or human trafficking and for ensuring appropriate due diligence is carried out on new and existing suppliers.

Training: The Organisation provides employees with information and training, where appropriate, to help identify, prevent and report any concerns relating to modern slavery and human trafficking.

RELEVANT POLICIES

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

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.

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.

Supplier code of conduct: The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious

violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

Corporate Social Responsibility: We ensure our business monitors its compliance with the law and industry standards, we often go above and beyond our obligations particularly in terms of the effects on the environment and impact on social welfare. JKC'S sustainable procurement practices consider the impact on the environment, economic and social factors as well as price and quality, our sustainability efforts are also aimed at promoting positive benefits and fairness for suppliers, employees, guests, and all stakeholders.

DUE DILIGENCE

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

To date, the Organisation has not identified any instances of modern slavery or human trafficking within its operations or supply chain.

TRAINING

The organisation requires all staff within the organisation to complete training on modern slavery. The organisation's modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;

- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

AWARENESS-RAISING PROGRAMME

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

BOARD APPROVAL

This statement has been approved by the organisation's board of directors, who will review and update it annually.

Director's Signature:

Director's Name: Niall MacFlynn

Date: 03 / 09 / 2026