

## ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made on behalf of Ingram Motoring Group Limited pursuant to Section 54(1) of the Modern Slavery Act 2015 (the 'Act'), and constitutes the Group's slavery and human trafficking declaration.

It sets out our arrangements to tackle and eliminate modern slavery within the financial year of 2024/2025 and applies to all persons working for us or on our behalf in any capacity, including but not limited to employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and any business affiliated with the supply chain.

### About Ingram Motoring Group Limited

Ingram Motoring Group Limited, a family owned and operated company established 50 years ago, has become the dealer of choice for drivers who are looking for good advice, good value and great service in Ayrshire, Scotland and beyond. Our aim is for every Ingram customer to drive away smiling.

We are committed to partnering with one of the most trusted brands in the world – The Volkswagen Group. Ensuring our ethical values and moral standards align extensively with one another is of the utmost importance to Ingram Motoring Group.

Maintaining a zero tolerance approach to any form of modern slavery and human trafficking in any of the business operations, the Group has, and will continue to be, committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation, in accordance with the Act.

We expect that our brand partners will hold their own employees, business partners and other third parties to the same high standards.

### Code of Conduct

Ingram Motoring Group is concerned to have a clear and unambiguous Code of Conduct which is understood and adhered to by every employee, regardless of position and length of service.

Detailing the expected behaviours, The Code of Conduct focuses on honesty, integrity and ethical behaviour as well as responsibility. It helps employees observe existing company rules in the workplace and act in a socially responsible manner by setting out the context within which Ingram Motoring Group can operate effectively to meet the expectations of internal and external stakeholders. The Code of Conduct is available at all times to all employees, along with the policies and procedures in relation to The Modern Slavery Act 2015 noted below.

As a Volkswagen Group (VWG) business partner, Ingram Motoring Group aligns with the ethical requirements as set out in The Code of Conduct of the Volkswagen Group. All employees are required to complete regular mandatory training as set out by VWG, regardless of hierarchical level. Including observance of human rights, such as the prohibition of child labour, human trafficking and slavery, as well as ensuring environmental protection and preventing corruption, the requirement to comply with VWG Code of Conduct is regarded as the basis for shaping the business relationship and ensuring all parties align in a shared vision to eradicate anti-slavery and human trafficking within the supply chain.

Our Policies in relation to The Modern Slavery Act 2015

The following policies are available to all employees:

- Anti-Slavery and Human Trafficking Policy
- Anti-Bribery Policy
- Bullying and Harassment Policy
- Code of Business Behaviour
- Equality, Diversity and Inclusion Policy

#### Responsibilities

We will continue throughout 2024/2025 to prevent modern slavery or human trafficking within the organisation by taking embedding these principles and combining the following steps:

- Continued communication regarding our whistleblowing system, responsible for receiving and processing reports of serious regulatory violations. Our employees, business partners and other third parties may use our whistleblowing system to report modern slavery concerns or incidents.
- Complying with applicable labour laws relating to working terms and conditions, including pay. We place great emphasis on the fair and equal treatment of all employees, who are paid a least the National Living Wage.
- Ongoing regular risk assessments ensuring compliance with Right to Work documentation for new employees to prevent employees working illegally.
- Due diligence to guarantee suppliers are taking the necessary steps to mitigate any risks on the use of child labour, slavery and human trafficking.

#### Our Commitment

Ingram Motoring Group is dedicated to the prevention, detection and reporting of modern slavery in any part of our organisation. Employees, Directors and all stakeholders must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this statement.

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for all. We cultivate a culture wherein every individual feels confident in exposing any wrongdoing without any risk to themselves.

The Group acknowledges that modern slavery exists and everyone has a vital role to play in tackling the issue of exploitation. In the event that any of our business partners are found to be engaging in slavery or other unethical working practices, we will take steps to address those issues with this business partner, seek to drive improved standards and, if necessary, terminate relationships with any such business partners.

This statement has been approved by the Ingram Motoring Group Board of Directors on 6<sup>th</sup> September 2024.

Managing Director: Malcolm Ingram

Finance Director: Andrew Fyfe

Sales Director: Kenneth Monaghan

*This statement will be reviewed and updated annually.*