

FP Smith Holdings Limited Slavery and Human Trafficking Statement

The Modern Slavery Act 2015 (MSA 2015) focuses specifically on the issue of modern slavery to ensure offenders are suitably reprimanded with severe sentences. Modern slavery encompasses the offences of: 'slavery' where ownership is exercised over a person; 'servitude' which involves the obligation to provide service imposed by coercion; 'forced or compulsory labour' involves work or service exacted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily; and 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

The MSA 2015 requires large businesses, with sales of over £36 million, to be transparent about their efforts to eradicate slavery and human trafficking. This statement therefore explains the steps we have or will be taking during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or any part of our business

This statement relates to F.P. Smith Holdings Ltd. (otherwise known as Smiths Motor Group) and its subsidiary companies listed below.

- F.P. Smith Holdings (Newark Avenue) Ltd.
- F.P. Smith Holdings (Ilkeston) Ltd
- F.P. Smith Motors Ltd

The Smith Motor Group has been a family owned and run business for over 80 years and employs around 145 staff members. The Group operates in the sale of new and used vehicles, servicing, repairs and the supply of parts. We represent Dacia, Hyundai, Nissan, Renault and Vauxhall brands with sites in Peterborough, Cambridgeshire and Ilkeston, Derbyshire.

The Smith Motor Group is committed to delivering high standards of corporate governance and are committed to seeking to ensure that there is no modern slavery or trafficking in our supply chain or within our business operations. Through the training and development of all staff we ensure that they adhere to all relevant laws, regulations and standards, including but not limited to the Modern Slavery Act 2015. If any staff member is found in breach of our policies, we ensure suitable disciplinary action is taken which can include termination.

The nature of our business requires that we work in conjunction with a range of suppliers and our supply chain comprises of:

- New and used motor vehicles, components and products supplied by the vehicle manufacturers;
- Used motor vehicles purchased from private individuals, businesses and other motor retail companies primarily based in the UK;
- Indirect goods, services, products and parts purchased from businesses primarily based in the UK

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, we have or are in the process of introducing the following actions:

- Updating the General Terms and Conditions of Business for the Supply of Goods or Services to FP Smith Holdings Ltd to include obligations that forbid the use of slavery and human trafficking;
- Developing a risk based approach to assess the likelihood of the existence of modern slavery within our supply chain;

- Introducing a due diligence process for those suppliers identified as being potentially high risk.
- Implementing a supplier business review process, where appropriate, for high risk suppliers to ensure continued compliance.

Our processes aim to:

- Identify, monitor and manage areas of potential risk in our business and supply chains
- Scrutinise any identified areas of risk within our business and supply chains
- Adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation and our supply chains
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

The Group does not engage in forced or involuntary labour and have a zero-tolerance approach to the same, meaning that we do not tolerate any of our suppliers engaging in such conduct. We are committed to creating a safe and harmonious working environment, which is free from harassment and bullying and in which every employee is treated with respect and dignity. Through our employment policies we ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation.

We also recognise that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and The Group's success ensured. The Group's Public Interest & Disclosure (Whistleblowing), also provides clear guidance to all of those whom work within the organisation, including casual and temporary staff, whom may from time to time feel that they need to raise issues relating to the Group or one of its supplies in confidence and without detriment or disadvantage.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes FP Smith Holdings Ltd slavery and human trafficking statement for the financial year ending 31st March 2025.

Daniel Fitzjohn

Group Managing Director – FP Smith Holdings Ltd

5th August 2024