

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT (FINANCIAL YEAR 2022-2023)

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) to provide the measures that we take to prevent slavery and human trafficking in our business and our supply chains.

Anti-Slavery and Human Trafficking Policy

Saxton 4x4 Ltd has adopted a statement of our corporate value on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all persons or organisations with whom we contact directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with Saxton 4x4 Ltd and/or any member of our company, to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery value.

Saxton 4x4 Ltd Anti-Slavery Value

As part of our culture of good governance for good business, Saxton 4x4 Ltd operate to a set of core values around professionalism, integrity and teamwork, which reflect our relationships with our principal stakeholder groups: customers, manufacturers, shareholders, suppliers and team members. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

Overall, we run a zero-tolerance attitude towards modern slavery.

Purpose of this Policy

Modern slavery is a criminal offence under the Act. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy Saxton 4x4 Ltd (the “Company”) and its subsidiaries as listed below have written to prevent opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

As a company, we have zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

Corporate Structure and Supply Chains

This statement covers the activities of the following associate brands:

Forza Finance Ltd;

We Buy Prestige Car Ltd;

Reference to Saxton 4x4 Ltd within this policy covers the above entities.

We are determined to ensure that slavery and human trafficking are not taking place within our business or any of which we associate.

Steps for the prevention of Modern Slavery

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment. Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. Our continuous action plan to underpin our compliance with practical steps, include consideration of the following measures;

Continue to carry out risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;

Continue to engage with our suppliers both to convey to them our anti-slavery policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;

Where appropriate, as informed by our risk assessment, seek to introduce supplier prescreening (for example as part of our onboarding process) and self-reporting to our suppliers on safeguarding controls;

Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion;

Relevant Policies

The following policies are integral to our continued dedication to identify modern slavery risks and prevent slavery and human trafficking in its operations:

Whistleblowing policy

We encourage all its employees, workers, contractors, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. The whistleblowing procedure is designed to be easy for individuals to make disclosures in confidence and without fear of retaliation. The Company also encourages members of the public or people not employed by us to write, in confidence to the Managing Director or the Human Resources Department to raise any concern, issue or suspicion of modern slavery in any part of our business or supply chain.

Recruitment policy

We operate a preferred supplier list of reputable recruitment agencies for all vacancies. This list is created against a set of strict regulations, of which their compliance to modern slavery is included. Our preferred supplier list is reviewed on a regular basis and any serious violations of modern slavery standards will lead to their removal from the list.

Safeguards

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Responsibility for the Policy

Ultimate responsibility for the prevention of modern slavery rests with the Managing Director. The Executive Team has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.