MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT (FINANCIAL YEAR ENDING June 2026)

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.

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' which 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' which concerns arranging or facilitating the travel of another with a view to exploiting them. Modern slavery in any form is the deprivation of one person's liberty by another to exploit for personal or commercial gain.

At Saxton 4x4 Ltd t/a Saxtons we have a zero-tolerance approach to modern slavery and we are committed to act ethically and with integrity in all our business dealings.

Anti-Slavery and Human Trafficking Policy
Saxtons 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 are committed to opposing modern slavery in all its forms and preventing it by whatever means. We demand the same attitude of all our employees. We expect all who have, or seek to have, a business relationship with Saxtons to familiarise themselves with our anti-slavery values and to act at all times in a way which is consistent with our anti-slavery values.

Our main suppliers are vehicle sellers and vehicle parts suppliers. In addition, we have commercial arrangements with vehicle finance providers, professional service providers such as legal and accountancy as well as suppliers of other goods and services, for example, workshop goods/consumables and company uniforms. Consequently, the supply chain prior to the sale of a vehicle or the repair of a vehicle is complex and has many elements. This makes it challenging, as a UK motor retailer, to see or manage issues in the supply chain.

This policy applies to everyone working for us or on our behalf in any capacity, including employees at all levels, directors, contractors, external consultants, third-party representatives and business partners.

Saxton 4x4 Ltd t/a Saxtons Anti-Slavery Value
As part of our culture of good governance for good business, Saxtons operate to a set of core values around professionalism, integrity and teamwork, which reflect our relationships with our customers, manufacturers, suppliers, employees and shareholders. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

We allow all individuals who work or provide services to us the right to freely choose employment and, the right to associate freely with other individuals. As a result of our training, we offer an environment which is free from harassment and unlawful discrimination. We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation. We do not engage in forced or involuntary labour and have a zero tolerance approach to this, meaning we do not tolerate any of our suppliers engaging in such conduct.

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.

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

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.

We expect the same high standards from all of our contractors, suppliers and other business partners, and we prohibit 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.

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. However, we underpin our compliance with practical steps, include consideration of the following measures;

- Continue 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, seek to introduce supplier pre-screening (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
Saxtons has in place a number of policies, guidance and procedures which set out the standards of behaviour and core values that it expects of its employees.

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

- a Colleague Handbook
- an Equality and Diversity policy, which emphasises an inclusive working environment and a culture of mutual respect and consideration, free from discrimination, harassment, bullying, violence, abuse, coercive behaviour and related misconduct
- an Anti-Bribery and Corruption policy
- a Business Entertainment and Gifts policy
- a Lone Working policy and
- a Whistleblowing policy, allowing employees to report concerns without fear of adverse treatment or reprisal.

This above list is not exhaustive.

These policies set clear standards to our employees for legal compliance. Disciplinary procedures are in place for any employee whose conduct does not meet the standard required.

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.

We have our own recruitment team and may also use third party recruiters. We operate a preferred supplier list of reputable recruitment agencies when using recruitment agencies. 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 our Anti-Slavery and Human Trafficking 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.

As we have a zero tolerance approach to modern slavery, and have not identified any indications that it occurs at Saxtons or in our supply chain, we have not adopted any performance indicators.

Responsibility for the Policy
We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if the concerns or suspicions they raise turn out to be mistaken.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of everyone working for us. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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 issues of modern slavery.

Our Executive Team has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Ultimate responsibility for the prevention of modern slavery rests with the Managing Director.