

MODERN SLAVERY STATEMENT

2026/27

This statement is published pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by Shelbourne Motors Limited and its subsidiaries (together, “Shelbourne Motors” or “the Group”) to prevent modern slavery and human trafficking from taking place in our business and supply chains.

Slavery and human trafficking remain a hidden blight on our global society and a crime which violates fundamental human rights. Shelbourne Motors operates a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business relationships. Every member of staff has a responsibility to be alert to the risks, however small, in our business and in our wider supply chain. Staff are expected to report concerns, and management are expected to act on them.

Organisation’s Structure

Shelbourne Motors Limited is the parent company of the Shelbourne Motors Group. Established in 1973, we are a multi-franchise vehicle retailer specialising in new and used vehicle sales, vehicle servicing, maintenance, repair, and associated services. We are based in Northern Ireland, with suppliers throughout the UK and Ireland as well as relationships with global vehicle manufacturers.

This statement covers the following group companies:

- Shelbourne Motors Limited
- Shelbourne Motors Holdings Limited
- SVRGo Holdings Ltd
- SVRGo Ltd

The Group has an annual turnover in excess of £115 million and currently employs 180 team members.

Our Supply Chains

Shelbourne Motors engages suppliers where the relationship is based on trust, respect and transparency, and we expect all suppliers to meet our standards of business practice. We encourage suppliers to promote equivalent standards throughout their own supply chains.

We work with a wide variety of national and local suppliers, including vehicle manufacturers, funders, motor dealerships, and agencies, to source the goods, services and equipment needed to run our business.

We recognise that risk is not evenly distributed across our supply chain. We treat the following as higher-risk and apply additional scrutiny accordingly: subcontracted vehicle valeting and logistics/transport services; agency and third-party labour; and suppliers further down our supply chain — for example, the manufacture of vehicle parts and components overseas — where we have less direct oversight.

Where we are unable to satisfy ourselves that a supplier is aligned with the Modern Slavery Act 2015, we first work with that supplier to achieve compliance within an agreed timescale; where this cannot be achieved, we terminate the contract.

The following policies are made available to all staff through the Shelbourne induction: Code of Conduct; Ethics Policy; Speak Up Policy; Bullying and Harassment Policy; Diversity and Inclusion Policy; Recruitment and Selection Policy.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our culture of good governance is underpinned by our zero-tolerance approach to modern slavery, and we expect the same attitude from everyone who works for us and everyone who supplies to us. Our Whistleblowing, Business Ethics, Equal Opportunities and Recruitment policies all address anti-slavery, either directly or indirectly.

Our Due Diligence Processes

We build long-standing relationships with our suppliers and set out our expectations of business behaviour clearly. We expect suppliers to have suitable anti-slavery and human trafficking policies and processes of their own, and we expect

each supplier to apply ‘one-up’ due diligence to the next link in the chain, as it is not practical for us to hold a direct relationship with every tier of our supply chain.

Our due diligence process includes:

- Carrying out modern slavery due diligence on all new higher-risk suppliers before we begin trading with them.
- Including modern slavery requirements in the terms of significant new supplier contracts.
- Reviewing and revalidating our higher-risk suppliers annually.
- Undertaking due diligence when onboarding new clients as well as new suppliers.
- Maintaining systems that encourage the reporting of concerns and protect whistleblowers.

Our Risk Assessment and Escalation Process

We carry out a modern slavery risk assessment across our business and supply chains annually, reviewing where our exposure sits and whether our controls remain adequate. Where a concern is raised — whether by a member of staff, a supplier, or through another channel — it is escalated through our Speak Up policy and risk-assessed within five working days. Where a supplier is found to require corrective action, we agree a timescale for that action and track it to completion.

Measuring Our Effectiveness

We use the following key performance indicators to monitor and evidence the effectiveness of our anti-slavery and human trafficking controls. These are reviewed by the Board as part of the annual approval of this statement.

Key Performance Indicator	Target
Relevant employees completing modern slavery training	100% annually
Relevant HR, procurement and management employees completing enhanced training	100% annually
New higher-risk suppliers completing modern slavery due diligence	100%
Relevant new significant supplier contracts containing modern slavery requirements	100%
Higher-risk suppliers reviewed / revalidated	100% annually
Modern slavery concerns appropriately escalated	100%
Reported concerns risk-assessed within 5 working days	100%
Supplier corrective actions completed within agreed timescales	≥95%
Annual modern slavery risk assessment completed	100%
Annual statement reviewed and approved by the Board	100%

Where performance falls short of target, we identify the root cause and take corrective action, which is reported to the Board.

Training

All relevant employees complete modern slavery awareness training annually, covering how to recognise the signs of modern slavery and how to report a concern. Employees in HR, procurement and management — who are most likely to encounter risk directly, whether through recruitment, supplier selection, or day-to-day people management — complete enhanced training covering supplier due diligence, contract requirements, and escalation handling. Our Directors also receive briefings on modern slavery risk.

Governance

This statement applies to all employees and business divisions within Shelbourne Motors.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Shelbourne Motors Limited and its subsidiaries for this financial year.

This statement, including the KPIs set out above, is reviewed and approved annually by the Board of Directors.

Caroline Willis
Financial Director