



MODERN SLAVERY, CHILD AND FORCED LABOUR STATEMENT

Slavery and human trafficking remains a hidden blight on our global society and is a crime which violates fundamental human rights. The Grosvenor Group operates a zero-tolerance approach to modern slavery, child and forced labour and is committed to acting ethically and with integrity in all business activities and relationships. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them. This statement sets out the steps the Grosvenor Group and its subsidiaries have taken to prevent modern slavery and human trafficking.

ORGANISATION'S STRUCTURE

Hardwater Holdings Limited is the parent company of the Grosvenor Group. We are a provider of Contract Hire and Fleet Management Services. The group has its head office in the UK and all trading outlets are in the UK. The group companies consist of:

Grosvenor Contracts Leasing Limited – Contract Hire & Personal Contract Hire

York, Ward & Rowlatt Ltd – Vauxhall Motor Dealership

Croyland Motors Limited - Retailer of used vehicles and vehicle preparation centre

Interactive Fleet Management Limited – Fleet Management Services

Croyland Rentals Limited – Property Rental Company

Holmere Developments Limited – Property Refurbishment Company

The group has an annual turnover in excess of £111m and currently employs 252 team members.

OUR SUPPLY CHAINS

The Grosvenor Group uses a wide variety of national and local suppliers to source goods, services and equipment for the day to day running of its business. Specifically we work with a number of vehicle manufacturers, funders, motor dealerships and agencies. The directors recognise the importance of understanding the integrity of our supply chain and act with diligence when reviewing suppliers to ensure the risk of slavery and human trafficking is reduced throughout the organisation. We will endeavour to satisfy ourselves that a supplier is aligned to the Modern Slavery Act 2015. We use a combination of measures to achieve this including a supplier due diligence questionnaire, published policies and by creation of a supplier 'red list' for those suppliers who present a higher risk.

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 to modern slavery and we expect the same attitude from all who work for us and those supplying to us. We have a complete suite of policies in place which include Whistle Blowing, Business Ethics, Equal Opportunities and Recruitment, all of which deal with the anti-slavery initiatives either directly or indirectly.



DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Where possible we build long standing relationships with our suppliers and make clear our expectations of business behaviour. We prefer these entities to have suitable anti-slavery and human trafficking policies and processes. Each entity ideally adopts a 'one-up' due diligence on the next link in the chain. It is not practical for us to have a direct relationship with all links. We have in place systems to encourage the reporting of concerns and the protection of whistle blowers. We undertake due diligence when considering taking on new suppliers.

CHILD AND FORCED LABOUR

Child labour, as defined by the International Labour Organisation (ILO) Convention, is "work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under the age of 18 that is hazardous to the physical or mental health of the child.

Forced labour is any work or service exacted from any person under the menace of any penalty for its nonperformance and for which the worker does not offer him or herself voluntarily. Payment of wages or other compensation to workers does not necessarily mean labour is not forced or compulsory.

In the conduct of its business, the Grosvenor Group:

- Will not tolerate child or forced labour;
- Will not employ children that fall into the definition as stipulated by the ILO Convention, notwithstanding any national law or local regulation;
- Will comply with all other applicable child labour laws, including those related to wages, hours worked, overtime and working conditions;
- Is against all forms of exploitation of children. The Grosvenor Group does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities;
- Expects its suppliers, subcontractors and business partners to have and uphold similar standards and abide by country-governing laws in countries wherein they operate. Should violation of these Principles become known to the Grosvenor Group and not be remediated, we will take serious action, including discontinuation of the business relationship.

AWARENESS AND TRAINING

To ensure a level of understanding of the risks of modern slavery and human trafficking in our supply chains and business, including awareness-raising of the signs of modern slavery, we have provided briefings to our Directors and employees.

In this next year, we will introduce further training on anti-modern slavery for all department heads, and employees directly involved with supply chains, to help them recognise the signs of modern slavery, and obtain confirmation that they know what to do if they suspect it, so that action can be taken.



MEASURING THE EFFECTIVENESS OF THE POLICY

At the Grosvenor Group we believe this statement makes it clear that our attitude to modern slavery is one of zero tolerance. We have not implemented any compliance indicators as any instance of modern slavery or human trafficking by a supplier would be considered to be a breach of this policy. However, we will use the following key performance indicators to measure our effectiveness at managing modern slavery risks:

- Obtain confirmation from employees and contractors that they have read and understood our Modern Slavery Statement
- Introduction of Modern Slavery & Human Trafficking Due Diligence Questionnaire

GOVERNANCE

This statement applies to all employees and business divisions within the Grosvenor Group.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

The statement was approved by the Grosvenor Group board of director's on 12th January 2023.

NICK HUGHES

Group CEO

THE GROSVENOR GROUP