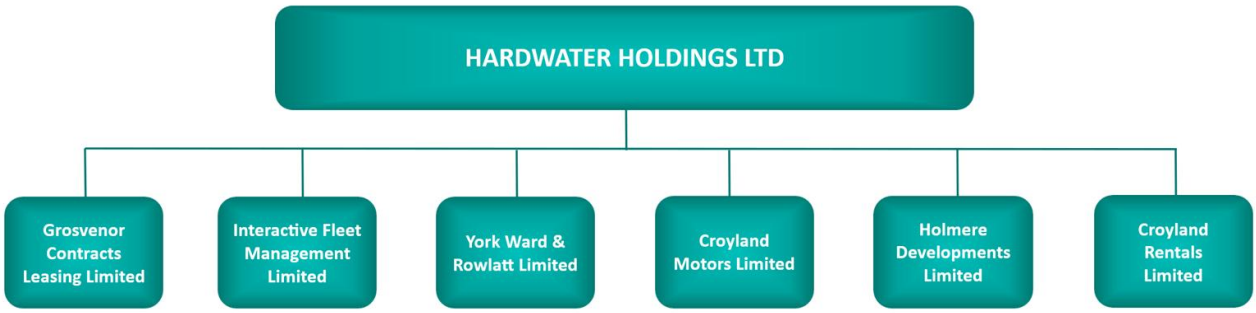
MODERN SLAVERY, CHILD, AND FORCED LABOUR STATEMENT

Modern slavery, including human trafficking, continues to be a significant global issue that violates fundamental human rights. The Grosvenor Group is committed to taking a zero-tolerance approach to modern slavery, child labour and forced labour. We uphold high standards of ethics and integrity in our operations and business relationships, and are dedicated to preventing exploitation and abuse.

This statement sets out the steps taken by the Grosvenor Group during the financial year covered by this statement to identify, prevent and address the risks of modern slavery and human trafficking in our own operations and supply chains.

ORGANISATION'S STRUCTURE AND OPERATIONS

Hardwater Holdings Limited is the parent company of the Grosvenor Group, specialising in Contract Hire and Fleet Management Services. The group comprises the following subsidiaries:



- **Grosvenor Contracts Leasing Limited** – Contract Hire & Personal Contract Hire
- **Interactive Fleet Management Limited** – Fleet Management Services
- **York, Ward & Rowlatt Ltd** – Vauxhall Motor Dealership
- **Croyland Motors Limited** – Retailer of used vehicles and vehicle preparation centre
- **Holmere Developments Limited** – Property Refurbishment Company
- **Croyland Rentals Limited** – Property Rental Company

With an annual turnover of over £138 million, the Grosvenor Group employs 295 staff members.

OUR SUPPLY CHAINS

We rely on a broad network of suppliers for the goods, services and equipment essential to our operations. These suppliers include vehicle manufacturers, motor dealerships, service providers, funders, recruitment agencies and other business partners.

To mitigate the risk of modern slavery within our supply chains, we take a proactive approach, regularly assessing the industries and regions from which we source. Key measures include:

- **Supplier due diligence questionnaires** to assess and manage risks.

- A **supplier 'red list'** to flag high-risk suppliers for closer scrutiny or corrective action.
- Regular **reviews and audits** of our supply chains to ensure compliance with our ethical standards.

We work with suppliers who share our values and commitment to ethical conduct, and we hold them accountable for upholding these standards.

RISK IDENTIFICATION AND MITIGATION

The Grosvenor Group takes a risk-based approach to identifying and mitigating the risks of modern slavery, human trafficking and forced labour within its operations and supply chains. Our assessment considers the nature of the goods and services purchased, the types of work undertaken, the use of subcontractors and agency labour, and relevant geographic and sector risks. We use supplier due diligence, monitoring and engagement to identify potential concerns and take proportionate action where risks are identified. The Group will review its risk assessment periodically and when there are material changes to its operations or supply chains.

POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Our **Anti-slavery Policy** reflects our commitment to ensuring that modern slavery and human trafficking have no place in our business or supply chains. This policy is regularly reviewed to ensure its effectiveness. In addition, we have a range of complementary policies that support anti-slavery initiatives, including:

- **Whistleblowing Policy**: Protects employees and suppliers who report concerns about unethical practices, including modern slavery.
- **Business Ethics Policy**: Sets clear expectations for ethical business conduct, with a focus on transparency and integrity.
- **Equal Opportunities Policy**: Ensures fair treatment for all employees.
- **Recruitment Policy**: Includes pre-employment checks to prevent the employment of forced or child labour.

Together, these policies create a robust framework for preventing modern slavery.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We establish strong, long-term relationships with our suppliers, clearly communicating our expectations regarding ethical conduct. While we may not have direct relationships with every link in the supply chain, we encourage our suppliers to adopt a **'one-up' due diligence approach** to ensure their suppliers also meet our standards.

Our due diligence processes include:

- **Supplier vetting** before forming new relationships, assessing potential risks in line with our ethical standard, including contractual clauses that prohibit forced or trafficked labour.

- Ongoing **monitoring and audits** to ensure suppliers comply with our Anti-slavery Policy.
- A clear **reporting mechanism** for employees, suppliers, and business partners to raise concerns, with robust protections for whistleblowers.

CHILD AND FORCED LABOUR

The Grosvenor Group is committed to upholding the principles outlined by the **International Labour Organisation (ILO) Convention**, particularly in relation to child and forced labour. We do not tolerate any form of child or forced labour, and we strictly adhere to the following:

- We do not employ children, as defined by the ILO Convention, regardless of national or local regulations.
- We comply with all applicable laws related to child labour, including those governing wages, working hours, overtime, and working conditions.
- We oppose all forms of child exploitation, ensuring that children are not employed before completing compulsory education, as defined by relevant authorities.

We expect our suppliers, subcontractors, and business partners to uphold the same standards. Any supplier found in violation of these standards may face serious consequences, including the termination of business relationships.

AWARENESS AND TRAINING

We provide training for all existing directors and employees, and all new employees during induction to ensure they understand the risks of modern slavery and human trafficking. This training includes:

- Identifying the signs of modern slavery and human trafficking.
- Knowing how to report concerns through appropriate channels.
- Understanding our legal obligations under the Modern Slavery Act 2015.

Training is refreshed regularly, and we ensure employees are equipped with the knowledge to help prevent modern slavery.

EFFECTIVENESS MEASURED THROUGH KPIs

We are committed to ensuring the effectiveness of our measures to combat modern slavery. Key performance indicators (KPIs) for monitoring our efforts include:

- The completion of the **Modern Slavery & Human Trafficking Due Diligence Questionnaire** by our suppliers.

- Ensuring all employees confirm they have **read and understood our Modern Slavery Statement** and are aware of how to report concerns.

While any instance of modern slavery would be considered a serious breach, these KPIs help us track the ongoing effectiveness of our anti-slavery practices.

GOVERNANCE

This statement applies to all employees and business divisions within the Grosvenor Group and is made in compliance with Section 54(1) of the **Modern Slavery Act 2015**. It was approved by the Grosvenor Group Board of Directors on **12th November 2026**.

Next review date **12th November 2027**.



NICK HUGHES
Group CEO
THE GROSVENOR GROUP