

ARNOLD CLARK GROUP

Modern Slavery and Human Trafficking Statement

Financial Year Ended 31 December 2025

This statement is made by the Arnold Clark Group in accordance with section 54 of the Modern Slavery Act 2015 and sets out the measures we take to prevent modern slavery and human trafficking from occurring in our business and supply chains.

The statement covers the Arnold Clark group of companies, which comprises Arnold Clark Automobiles Limited, Arnold Clark Finance Limited, Arnold Clark Insurance Limited, Assure Alarms Limited, Bumblebee EV Limited, Central Car Auctions Limited, GTG Training Limited, and ID Computer Software Limited.

We are fully committed to preventing acts of modern slavery and human trafficking from occurring in our business and supply chain. We require our suppliers to apply the same standard.

This statement will be made available on all of our websites and to all who engage with us, whether in employment or in business, so that those parties may familiarise themselves with the contents.

Who we are

The Arnold Clark Group operates retail sites and service centres across the UK for the sale, hire, and servicing of new and used automobiles. We represent 36 new car manufacturers and operate over 180 dealerships, 140 service centres, 15 accident repair centres, and 14 parts centres. We also have 43 car and van rental locations, six vehicle leasing business centres, four training facilities, five auction houses and an electric vehicle charging business. We directly employ over 11,000 people and have sites across the length of the country, from Elgin to Exeter and from Greenock to Norwich.

Our business functions are broad. We buy and sell vehicles and assist customers to arrange finance. We sell parts and accessories from our parts centres and hire vehicles to the public and to businesses throughout the UK. Our vehicle aftercare includes MOT testing, accident repairs, servicing and maintenance of vehicles for both businesses and the public. We provide a suite of fleet management services to businesses in the public, private and third sectors. We provide and arrange insurance. We provide electric vehicle charging facilities for our customers and provide and install a range of charging products for electric vehicles to retail customers and businesses. Our training centres deliver various qualifications, apprenticeships, business courses and automotive courses.

Our supply chains

The broad nature of our business means that our supply chains are equally varied. We source and sell products and parts from a wide range of national and international suppliers. Supply chains in the automotive industry are inherently complex due to the large number of components and materials involved.

Areas of risk

Our assessment for 2025 has concluded that while risks exist in our recruitment practices and operational site management, the most significant risks remain in our material and subcontract procurement.

We source goods from a wide range of suppliers, both nationally and internationally. Our suppliers will have similarly diverse supply chains, making it difficult to conduct full audits of each tier. In addition, raw materials commonly used in the automotive industry, such as cobalt and lithium, mica, and rubber, can be supplied by higher-risk countries.

The global production of photovoltaic solar cells, used in our sustainability initiative, has been linked to regions where forced labour practices have been reported, particularly in the extraction and processing of polysilicon.

Some of our staff members are required to wear company uniforms. The garment industry is considered to present a high risk of modern slavery in both its national and international supply chains.

Construction has been highlighted by The Chartered Institute of Building as high risk for modern slavery. This is due to a combination of factors, such as high staff turnover, reliance on migrant workers and low profit margins across the industry. Our construction and maintenance work is outsourced.

Cleaning and valet services also face a higher risk of modern slavery due to similar factors as those in the construction industry, including high staff turnover and reliance on migrant workers.

Governance and oversight

Oversight of modern slavery risk sits within the Legal and Compliance function, with escalation to senior management and, where appropriate, to the Board of Directors.

Our approach is supported by internal reporting and escalation procedures, whistleblowing arrangements, procurement controls and supplier due diligence. The Board of Directors will be informed of any confirmed issue, including the findings and outcome of any investigation.

The steps we take to prevent slavery and human trafficking

We have a zero-tolerance approach to the use of child labour, slavery, or human trafficking of any kind across our business and supply chain. We are committed to taking action to prevent any cases from arising within our business and to mitigate against the risks of any exploitation throughout our supply chains.

We ensure that our suppliers commit to our company values by obtaining written confirmation from each that their business practices and supply chains operate in accordance with the Modern Slavery Act 2015. In procurement, this is evaluated as part of the tender process and then re-evaluated on a regular basis. We monitor supplier compliance with suitable levels of due diligence according to their level of risk, which we assess for the potential of human trafficking and/or modern slavery. However, due to the complexity of global supply chains in the automotive industry, we are unable to check every business relationship between each tier.

Our Estates department only contracts with contractors who are Alcumus SafeContractor approved to confirm that construction companies are appropriately accredited. Alcumus SafeContractor is committed to stamping out modern slavery within the construction industry. For workers on our own sites and locations, we require our contractors to check that all on-site workers carry Construction Skills Certification Scheme (CSCS) cards, which are only granted to licensed labourers and engineers. We have also engaged a third party to help us review our supply chain for photovoltaic solar cells, with the review including a specific focus on labour and procurement practices of the various suppliers.

One of our main protections against modern slavery is our employment policies process, which ensures that our organisation complies with minimum wage legislation and that all of our employees have the right to work in the UK. We also require our contractors to comply with these standards. While we acknowledge that this does not completely eradicate the risk of modern slavery, it is one of the most effective ways of combating this risk.

Wherever possible, we employ our own cleaning and valet staff. However, the use of third-party contractors is, at times, inevitable. To minimise the risk, these are limited to a small number of contractors who have been approved by our Group Valet & Cleaning Manager after appropriate diligence.

Contractual controls

We include contractual requirements within our supplier agreements requiring compliance with the Modern Slavery Act 2015 and other applicable laws relating to human rights and labour standards. These provisions support our ability to seek information from suppliers, conduct audits where appropriate, and take remedial action, including suspension or termination of supplier relationships, in the event of non-compliance.

Compliance

We adopt a zero-tolerance approach to modern slavery and human trafficking. Given that any confirmed instance would represent a breach of our policy, we do not rely solely on numerical key performance indicators. Instead, we assess effectiveness through the robustness of our due diligence processes, supplier engagement, and the prompt investigation and resolution of any concerns.

Any instances of non-compliance with this policy, or of alleged modern slavery or human trafficking that we are made aware of, will be assessed on a case-by-case basis. We will quickly and thoroughly investigate any claim or indication that any area of our business or supply chain is engaging in human trafficking or slave labour. Any such claim would be reported to senior management as appropriate. The Board of Directors will be informed of the issue, including the findings and outcome of the investigation.

If such instances are proven, remedial action will be taken and tailored to suit the circumstances. We will only trade with those who are taking steps towards full compliance. If we are not satisfied with the steps being taken towards full compliance, we will temporarily suspend our business with that supplier to the extent allowed in contract or law. The ultimate sanction for continual failure to comply will be for us to cease to trade with that supplier.

Our whistleblowing and employee conduct policies are available to all members of staff on our employee portal. This modern slavery statement is also readily available on our employee portal, as well as being available on our website.

During 2025, we continued to conduct reviews of high-risk suppliers and maintain our Supplier Code of Conduct. Suppliers have been asked to confirm compliance with these standards, and a copy is available on our website.

Action we are taking to combat modern slavery in 2026

While we continue to make progress towards reducing the risk of modern slavery and human trafficking within our business, we understand that there is still more that all businesses, including our own, can do.

In 2026, we will continue to develop our approach to supplier assurance, including the further use of our supplier onboarding platform, periodic reconfirmations, and targeted enhanced audits of selected overseas suppliers.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Arnold Clark Group's slavery and human trafficking statement for the financial year ended 31 December 2025. It has been approved by the Arnold Clark Automobiles Limited Board of Directors.

This statement will be reviewed and updated annually.

Signed	Russell Borrie
Position	Director
Date	25 June 2026