

## Modern Slavery and Human Trafficking Statement

Financial Year Ending 31<sup>st</sup> December 2026

### Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and **sets out the steps taken by taken** by Thomas Startin Junr Ltd, Startin Group Ltd and Freeman Junior Ltd (together, "the Group") to prevent modern slavery and human trafficking within our business and supply chains during the **financial year ending 31<sup>st</sup> December 2025**, together with our **ongoing commitments**.

We are committed to conducting our business ethically and responsibly and have a zero-tolerance approach to modern slavery, human trafficking, forced labour and exploitation.

### Our Business and Supply Chain

The Group operates within the UK motor trade across **a number of dealership locations**. Our activities principally include the sale of new and used vehicles, together with vehicle servicing, maintenance, repair, MOT testing and the supply of parts and accessories.

Our supply chain includes vehicle manufacturers and distributors, parts and component suppliers and providers of services including valeting, cleaning, workwear, facilities, recruitment, IT and other professional services.

We recognise that some of the products supplied to the Group originate from **complex international manufacturing and supply chains over which we have limited direct control**. Our approach is therefore focused on understanding areas of potential risk and applying proportionate controls within those parts of our business and supply chain where we can reasonably exercise influence.

### Our Policies and Employment Practices

We are committed to acting ethically and with integrity in all our business relationships and will not knowingly work with organisations involved in modern slavery, human trafficking, forced labour or exploitation.

Within our own workforce, we maintain recruitment, employment, payroll and right-to-work procedures designed to ensure that employees are employed lawfully, paid appropriately and treated fairly.

Employees are encouraged to raise concerns regarding unethical conduct, exploitation or working practices through their line manager, senior management or HR. Concerns can be raised without fear of inappropriate treatment or retaliation.

### Risk Assessment

We consider the risk of modern slavery within our directly employed UK workforce to be relatively low due to our recruitment, payroll and right-to-work controls.

We recognise that greater risks may exist within wider and international supply chains, particularly in areas involving:

- vehicle and component manufacturing;
- parts and accessories;
- workwear and other manufactured goods;
- temporary and agency labour;
- valeting and cleaning services; and
- other outsourced and labour-intensive services.

We will continue to review these areas to ensure that our controls remain appropriate and proportionate to the nature and scale of our business.

### **Supply Chain Due Diligence**

We seek to work with established and reputable suppliers and expect all organisations with which we do business to comply with applicable employment, human rights and modern slavery legislation.

Our approach is proportionate to the nature of the supplier and the potential level of risk. Particular consideration is given to suppliers and contractors operating within sectors where there may be greater reliance on temporary, agency, outsourced or lower-paid labour.

Where concerns are identified or brought to our attention, we may seek further information or assurances from the supplier, require appropriate remedial action or, where necessary, reconsider the business relationship.

### **Training and Awareness**

**The Group recognises the importance of ensuring that those responsible for employees and relevant supplier relationships understand the potential indicators of modern slavery and know how to escalate concerns.**

**We will continue to develop appropriate awareness amongst HR, management and other relevant employees, with particular focus on recruitment, employment practices, outsourced labour and higher-risk supplier relationships.**

### **Reporting Concerns**

Employees, customers, suppliers and other parties are encouraged to report any concerns regarding modern slavery, human trafficking, forced labour or exploitation.

Any concerns raised will be treated seriously and investigated where appropriate. Where an issue is identified, the Group will take appropriate action, which may include working with the relevant supplier or organisation to remedy the issue, escalating the matter to the appropriate authorities or terminating the relationship where necessary.

## Monitoring and Effectiveness

We recognise the importance of assessing the effectiveness of our approach and will continue to develop appropriate measures to monitor this.

During 2026, our review will include consideration of:

- any modern slavery concerns or incidents reported;
- issues identified within our employment practices or supply chain;
- relevant employee awareness and training;
- actions taken in response to identified supplier risks; and
- whether any changes are required to our policies or procedures.

This will enable us to demonstrate progress and strengthen future Modern Slavery Statements.

## Our Priorities for 2026

During 2026, the Group will continue to develop its approach by:

- reviewing modern slavery awareness and training for relevant employees;
- maintaining appropriate recruitment and right-to-work controls;
- considering modern slavery risk when reviewing relevant supplier relationships;
- giving additional consideration to higher-risk outsourced and labour-intensive services; and
- reviewing the effectiveness of our approach and identifying any further improvements required.

## Approval

- This statement relates to the financial year ended 31 December 2025 and was approved by the **Board of Directors of the Group on 22<sup>nd</sup> September 2026.**
- It has been signed on behalf of the Board by:
- Timothy Freeman & Ben Winslow  
Joint Managing Directors
- Date: 22<sup>nd</sup> September 2026
- **This statement will be published on the Group's website and reviewed within the first 6 months of 2027.**