

## Modern Slavery and Human Trafficking Statement

**Applies to Vertu Motors plc and its subsidiary undertakings:**

**All Car Parts Limited, Albert Farnell Limited, Grantham Motor Company Limited, Helston Garages Limited, Vans Direct Limited, Vertu Accident Repair Limited, Vertu First Investments Limited, Vertu Fourth Investments Limited, Vertu Motors (Chingford) Limited, Vertu Motors (Continental) Limited, Vertu Motors (TMC) Limited and Vertu Motors (VMC) Limited (the “Vertu Group”)**

The Vertu Group is committed to maintaining the highest standards of ethical conduct and integrity. We actively uphold, support, and respect the human rights of all individuals with whom we engage. We strictly prohibit the use of forced, bonded, involuntary, or child labour. Employment at the Vertu Group is based on free choice, and we are dedicated to ensuring equal opportunities and respecting the right to freedom of association for all employees.

### Purpose

Modern slavery refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power and is a crime resulting in an abhorrent abuse of human rights affecting the world's most vulnerable people. The Modern Slavery Act 2015 (**MSA 2015**) focuses specifically on the issue of modern slavery to ensure offenders are suitably reprimanded with severe sentences and it encompasses the offences of: 'slavery' where ownership is exercised over a person; 'servitude' which involves the obligation to provide service imposed by coercion; 'forced or compulsory labour' which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily; and 'human trafficking' which concerns arranging or facilitating the travel of another with a view to exploiting them.

The MSA 2015 requires large businesses, with sales of over £36 million, to be transparent about their efforts to eradicate slavery and human trafficking. This statement explains the steps that the Vertu Group has taken during the financial year and will continue to take to ensure that slavery and human trafficking is not taking place in any of our supply chains or any part of our business. It covers the areas outlined in the Home Office guidance:

- Organisational Structure;
- Supply Chains;
- Organisational Policies;
- Training;
- Assessing and Managing Risk;
- Due Diligence Processes; and
- Monitoring and Evaluation.

This statement is made pursuant to Section 54 of the MSA 2015 and constitutes the Vertu Group's slavery and human trafficking statement for the financial year ending 28 February 2026.

### Organisational Structure

The Vertu Group is composed of a group of trading subsidiaries under the holding company, Vertu Motors plc. Each trading subsidiary operates motor retail dealerships (selling new and used vehicles, parts and accessories) and service and repair centres divided by franchise, or other ancillary businesses. The ancillary businesses operated by the Vertu Group include the online brokerage of commercial vehicle sales, the retail of taxis and the online sale of vehicle parts and accessories. All of its operations are based in the United Kingdom and the Vertu Group currently:

- Employs around 7,338 colleagues;
- Represents 33 motor manufacturers; and
- Operates 188 dealership locations.

The Vertu Motors plc Board has overall responsibility and accountability for the effective management of our modern slavery risks and the Chief Operations Officer is responsible for identifying, assessing and

responding to modern slavery respectively and the governance structure that provides senior level oversight and management of modern slavery risk.

### **Motor Trade Supply Chain**

The Vertu Group's direct resale suppliers include those relating to:

- Sourcing vehicles, parts and accessories from UK and international original equipment motor manufacturers through long term franchise and / or agency supply contracts, each of which are listed at <https://investors.vertumotors.com/who-we-are/>.
- Sourcing vehicles from UK based auction houses and from UK based lease companies on long term partnerships and/or contracts.
- Purchasing vehicles from customers by way of part-exchange and directly from members of the public or from other motor trade businesses.
- Purchasing vehicle parts and accessories from UK based suppliers on long term partnerships and/or contracts.
- Obtaining vehicle industry related goods and services from UK based companies including finance and insurance products.

Our main resale suppliers are the original equipment motor manufacturers themselves, who supply vehicles, parts and accessories and they are responsible for the largest share of our value creation. In addition, we have commercial arrangements with UK based vehicle industry related goods and services providers including vehicle finance and insurance providers.

The automotive supply chain is complex with often six to ten tiers of suppliers between a customer, the retailer, the manufacturer and the source of raw materials that enter the manufacturing process with further inherent complexities arising from the substantial number of components and materials involved in motor manufacturing. The supply chain prior to the sale of a completed vehicle or the service and repair of a vehicle has many layered, interdependent, interconnected elements relying upon a global network of suppliers, sub-contractors and partners.

This makes it challenging for the Vertu Group, as a UK motor retailer, to see or effectively manage and mitigate the risk of modern slavery and human trafficking in the motor trade supply chain. Safeguarding social and legal standards and respecting human rights and environmental issues in that supply chain is ultimately the manufacturer suppliers' responsibility in both their labour and material supply chains, within and outside of the UK as most operate globally.

### **Operating Supply Chain**

The Vertu Group has a number of significant suppliers of goods and services to run our business including professional service providers (e.g. recruitment, legal, marketing, IT and accountancy) as well as suppliers of other goods and services (e.g. building maintenance, facilities management, security, cleaning, logistics, valeting services, workshop goods/consumables and company uniforms). Contracts are negotiated at group level or for smaller suppliers at a local level. Social and legal standards are imposed through our supply chain obligations.

We seek to identify and do business with companies that have values consistent with ours, including applying these expectations to their own supply chain.

In our standard procurement process for group-wide contracts (when engaging with a new supplier or renewing arrangements with an existing supplier), we request and review references and we issue contracts that incorporate this statement in a standalone section and standard Terms and Conditions (T&Cs). The T&Cs include specific requirements on our suppliers to confirm that they fully understand, agree with and shall comply with the Vertu Group's supply chain obligations including:

- Environmental Compliance;
- Data Protection obligations;
- Modern Slavery;
- Anti-Bribery, Anti-Tax Evasion and Anti-Money Laundering;
- Sexual Harassment;

- Prevention of Fraud; and
- Export Control and Trade Sanctions Regulations.

Specifically in relation to modern slavery we will not tolerate forced labour (including human trafficking), child labour or abusive disciplinary processes in our supply chain and we require our suppliers to:

- Comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the MSA 2015;
- Have and maintain their own policies and procedures to ensure their compliance;
- Not engage in any activity, practice or conduct that would constitute an offence under the MSA 2015 if such activity, practice or conduct were carried out in the UK; and
- Where we can mandate it, adhere to the Vertu Group's Slavery and Human Trafficking Statement and our policy on anti-slavery and human trafficking where applicable to it.

We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our supply chain obligations and policies are discovered.

### **Organisational Policies**

The Vertu Group recognises the key role of its colleagues in maintaining the highest standards of ethical conduct and integrity. Our policies and procedures supported by appropriate and effective colleague training assist in the management of risks relating to modern slavery and human trafficking for people employed directly by the Vertu Group and those employed in our supply chains.

We have an anti-slavery and trafficking policy in place internally, which is available to all colleagues on Vertu Central (the Vertu Group intranet) and can be accessed by third parties including suppliers and contractors on request.

We maintain a third party operated whistleblowing reporting system to improve the ability for colleagues and others to report any concerns (including illegal or unethical practices within the Vertu Group or in its supply chains) promptly, confidentially and effectively via AAB (previously called SeeHearSpeakUp). Details of this service are displayed on Vertu Central, at all of our locations and have been communicated to all colleagues. The system is available 24/7 365 days of the year.

We ensure that the people we hire have the right to work and that their basic rights as workers are protected. Our internal dedicated human resources experts manage the employment process, including the following practices to ensure it operates in a legal and ethical manner:

- Verifying an individual's identification documents and their right to work in the UK;
- Procuring appropriate references;
- Where appropriate for the role applied for, carrying out a Disclosure and Barring Service check; and
- Requiring external recruitment agencies, as Vertu Group suppliers, to comply with our supply chain obligations.

Our working practices are in accordance with all employment legislation. We allow all individuals who work or provide services to us the right to freely choose employment (including the freedom of workers to terminate employment), the right to associate freely with other individuals, and the freedom of association and collective bargaining. We prohibit and do not engage in forced or involuntary labour, any threat of violence, harassment and intimidation, unlawful discrimination, child labour and confiscation of worker's original identification documents. We have a zero tolerance approach to this conduct and we do not tolerate any of our suppliers engaging in such conduct.

If any colleague is found to be in breach of our policies, we would ensure suitable disciplinary action is taken, which could include termination of employment. The Vertu Group values include 'Integrity' and 'Respect' and these are embedded in the culture of the Vertu Group.

The Vertu Group regularly reviews its policies and communicates updates to colleagues and new and existing suppliers.

## **Training**

Vertu Group's training supports working practices that are in accordance with all employment legislation and an environment which is free from violence, harassment and intimidation and unlawful discrimination.

As part of the Vertu Group's induction process and throughout a colleague's employment, we train all colleagues to treat others with respect and courtesy as well as ensuring they adhere to the Vertu Group's various policies and procedures for colleagues (which can be accessed via Vertu Central at any time) as well as all relevant laws, regulations and standards. This is an ongoing process and includes a compulsory online element covering various compliance topics. The modern slavery module is compulsory for all General Managers, senior management and relevant central service colleagues (including procurement) to ensure that awareness is there across the Vertu Group.

We focus on ensuring our management teams are not only aware of the requirements to be alert to modern slavery but can also address concerns raised by their team or any suppliers.

## **Assessing and Managing Risk**

The Vertu Group has considered the likelihood that the goods or services we provide to our customers have been made fully or in part by slave labour including the consideration of:

- Our own colleagues (including temporary staff and apprentices);
- Employees of business partners and employees in our supply chains;
- The nature of the workforce (for example, reliance on low-skilled temporary labour);
- The complexity of the supply chain prior to the sale of a completed vehicle or the service and repair of a vehicle or the supply of a part or accessory within the motor retail industry;
- The global standing, reputation and supply chain obligations of our original equipment motor manufacturers and their published Modern Slavery and Human Trafficking Statements; and
- The scope and extent of other suppliers of operating goods and services.

The Vertu Group acknowledges that it is reliant upon its original equipment motor manufacturers safeguarding social and legal standards and respecting human rights and environmental issues in both their labour and material supply chains, within and outside of the UK as most operate internationally. We consider the multinational sourcing of raw materials that enter the motor manufacturing process, manufacture of the substantial number of components and materials involved in motor manufacturing and their inherent complexities provide the most salient modern slavery risks to workers (i.e. the highest likelihood and severity) within our supply chains. However we have minimal leverage to drive change in original equipment motor manufacturers' approach to risk assessment and mitigation but we have not been made aware of any inadequacies in their respective supply chain obligations.

Outside the motor trade supply chain we have identified:

- Low risk of modern slavery occurring in our business operations and among our direct colleagues as they are protected by strong employment laws as well as our own employment policies and practices.
- Higher risk of modern slavery occurring for workers providing contracted services such as cleaning, security and logistics, particularly where labour providers are used, or in third party goods suppliers outside of the manufacturer supply chain.

We continue to assess and manage the risk of modern slavery and human trafficking in our supplier due diligence process, especially for those areas of the business we deem the most salient modern slavery risks to workers and will periodically carry out enhanced checks against and / or with those suppliers.

## **Due Diligence Processes.**

Due diligence in relation to modern slavery forms part of the Vertu Group's wider framework around ethical trade, corporate social responsibility and human rights. The Vertu Group business model and business-related key performance indicators are appropriate within motor retail and should not cause, contribute or directly result in modern slavery in its operations and supply chains.

Our modern slavery due diligence procedures are based on the complexity of our supply chain relationships, the severity of the risk, and the level of influence we hold with our suppliers. Our due diligence efforts are targeted where the risks of exploitation are most salient and we are able to influence. Where increased risks are highlighted, supplier evaluation and due diligence will be performed proportionate to the risk identified.

Vertu Group colleagues have the facility and are encouraged to report concerns and can provide feedback to the business on working conditions. Additionally colleagues have access to anonymous reporting mechanisms.

No incidents of modern slavery have been reported or identified across the organisation's operations and supply chains. Some suppliers have been terminated for lack of adequate processes to prevent modern slavery.

### **Monitoring and Evaluation**

As we have a zero tolerance approach to modern slavery and have not identified any indications that it occurs in the Vertu Group or in our supply chain, we have not adopted any performance indicators. However, we are satisfied that our major motor trade suppliers are taking appropriate actions to effectively manage and mitigate the risk of modern slavery in their supply chains, and our ongoing work with our other suppliers should indicate if any of them are not implementing appropriate measures or cannot provide the necessary confirmations to us.

We recognise however that vigilance is a shared responsibility, and action must be taken when required. Every individual has the inherent right to live freely therefore we all have an obligation to support one another and actively contribute to the elimination of modern slavery and human trafficking.

### **Approval**

The board of directors of the Company approved this updated statement at its board meeting on 26 March 2026.



Signed.....  
David Crane, COO, on behalf of Vertu Motors plc

Dated: 26 March 2026