



## **T. G Holdcroft (Holdings) Ltd Anti-Slavery & Human Trafficking Statement**

This statement is published in accordance with the Modern Slavery Act 2015 (MSA) for the financial year ending 31 December 2024. It outlines the steps taken by the Company to prevent modern slavery and human trafficking within our business and supply chains.

For the purposes of this statement, “the Company” refers to any active subsidiary of T G Holdcroft (Holdings) Limited, which at the date of publication includes:

Holdcroft Renault Ltd, Holdcroft Honda Ltd, T G Holdcroft Motors Ltd, Holdcroft Nissan Ltd, Holdcroft Hyundai Ltd, Holdcroft Properties Ltd, and Stuart Graham Technologies Ltd. This Policy applies specifically to these companies.

T G Holdcroft (Holdings) Ltd is fully committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chains and expects the same high standards from all suppliers and business partners.

### **Our Business**

The Company operates new and used car franchised motor retail dealerships and service centres across Staffordshire, Cheshire, Greater Manchester, and the West Midlands. Our principal activities include the sale and servicing of automobiles.

We currently represent 13 new car manufacturers and operate from 28 dealerships, employing more than 700 people across these locations, as well as within our Head Office, Fleet Division, and Body Centre in Stoke-on-Trent.

### **Our business functions include:**

- Selling new and used vehicles
- Arranging finance to enable customers to buy or lease vehicles
- Providing vehicle aftercare, including servicing, MOTs, and repairs for both businesses and the public
- Selling parts and accessories to retail and trade customers
- Offering fleet management services to organisations in the public, private, and third sectors
- Carrying out accident repairs
- Policies and Governance

Our Anti-Slavery and Human Trafficking Policy, together with our Company Code of Conduct and Group GDPR Policy, sets out the steps we take to ensure our standards are implemented across the business and supply chains. Staff are made aware of these policies and are encouraged to familiarise themselves through our Employee HR & Payroll System, with reminders provided at induction and via regular communications.

## Steps Taken to Prevent Modern Slavery and Human Trafficking:

- Prohibits the use of slavery and human trafficking in all areas of our business and supply chains
- Ensures all business activity complies with minimum wage legislation
- Requires all contractors and suppliers to comply with minimum wage and right-to-work legislation
- Verifies that all employees have the legal right to work in the UK
- Conducts appropriate due diligence on suppliers, proportionate to the assessed level of risk

Given the breadth of our operations and supply chains, it is not feasible to examine every individual business relationship in detail. However, the Company recognises that the principal areas of risk lie within our supply chains. We require that the business practices of all suppliers comply with the Modern Slavery Act 2015 and monitor compliance through suitable levels of due diligence.

## Non-Compliance and Remedial Action

Any instances of non-compliance brought to our attention will be assessed on a case-by-case basis, and appropriate remedial action will be taken. The Company will only trade with suppliers who fully comply with our policy or who can demonstrate tangible progress toward compliance.

If we are not satisfied with the steps being taken, we may temporarily suspend business with that supplier (to the extent permitted under contract or law). Persistent failure to comply may result in termination of the trading relationship.

The Company will promptly and thoroughly investigate any report or indication of human trafficking or slavery within its operations or supply chains. Such matters will be reported to senior management under our Whistleblowing Policy, and the Board of Directors will be informed of the findings and outcomes.

## Awareness and Training

All employees have access to our policies, including the GDPR Policy, Business Code of Conduct, Equality, Diversity and Inclusion Policy, Whistleblowing Policy, and this Modern Slavery Statement. Ethical business practice and full compliance with applicable laws are fundamental to how we operate.

## Approval

This statement has been approved by the Board of Directors of T G Holdcroft (Holdings) Ltd and its subsidiaries. It will be reviewed and updated annually as required.

The full policy is available on our Company website at [www.holdcroft.com](http://www.holdcroft.com) under Corporate Responsibilities.



Martin McCormick  
Finance Director

Date: 4<sup>th</sup> April 2025