



ANTI SLAVERY AND HUMAN TRAFFICKING POLICY

1. Policy Statement

T G Holdcroft (Holdings) Ltd and its subsidiaries are fully committed to acting ethically and with integrity in all business dealings and relationships. We have a zero-tolerance approach to modern slavery and human trafficking and are dedicated to ensuring that these practices do not take place in any part of our business or supply chains.

We are also committed to improving our practices to combat slavery and human trafficking and to ensuring transparency in our approach, consistent with the Modern Slavery Act 2015.

This Policy applies to all persons working for or on behalf of the Company, including employees at all levels, directors, officers, agency workers, contractors, suppliers, and business partners.

2. Purpose

The purpose of this Policy is to:

- Prevent modern slavery and human trafficking in any part of our operations or supply chains.
- Establish procedures to identify, mitigate, and respond to risks related to modern slavery.
- Ensure compliance with the Modern Slavery Act 2015 and our corporate responsibilities.
- Set clear expectations for employees, suppliers, and partners regarding ethical conduct and due diligence.

3. Scope

This Policy applies to:

- T G Holdcroft (Holdings) Ltd and its subsidiaries, including: 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.

- All employees, contractors, consultants, agency staff, and any other individuals working on behalf of the Company.
- All third-party suppliers, service providers, and business partners.

4. Our Business and Supply Chains

The Company operates franchised motor retail dealerships and service centres across Staffordshire, Cheshire, Greater Manchester, and the West Midlands. Our operations include:

- The sale and servicing of new and used vehicles
- Vehicle financing and leasing
- Vehicle aftercare and repairs (including MOT and accident repairs)
- Sale of parts and accessories
- Fleet management services
- Our supply chains include relationships with national and international manufacturers, suppliers, and service providers.

5. Company Responsibilities

The Company will:

- Prohibit the use of forced, bonded, or involuntary labour, and the exploitation of children.
- Ensure compliance with all UK employment laws, including minimum wage and right-to-work legislation.
- Conduct supplier due diligence proportionate to the level of risk identified.
- Require all suppliers and contractors to confirm adherence to the Modern Slavery Act 2015.
- Investigate and take appropriate action on any reported concerns relating to slavery or trafficking.

6. Employee Responsibilities

All employees are expected to:

- Read, understand, and comply with this Policy.
- Remain vigilant for signs of modern slavery or human trafficking within the business or supply chains.
- Report any suspicions or concerns promptly in accordance with the Whistleblowing Policy.
- Complete any required training on ethical conduct and modern slavery awareness.

Failure to comply with this Policy may result in disciplinary action, up to and including dismissal.

7. Supplier and Contractor Requirements

The Company expects all suppliers and contractors to:

- Uphold the same zero-tolerance approach to modern slavery and human trafficking.
- Comply with all relevant legislation, including the Modern Slavery Act 2015.

- Demonstrate transparency in their labour practices and supply chains.
- Provide evidence of compliance when requested.

Where non-compliance is identified:

- The Company may suspend or terminate relationships with the supplier or contractor (to the extent permitted by contract or law).
Remedial actions will be considered on a case-by-case basis.

8. Reporting Concerns

The Company encourages employees, suppliers, and business partners to report any concerns or suspicions of modern slavery or human trafficking.

Reports can be made confidentially under the Whistleblowing Policy or directly to a line manager, HR, or a member of senior management.

All reports will be taken seriously, investigated promptly, and appropriate action will be taken. The Company will protect anyone who raises concerns in good faith from retaliation or victimisation.

9. Training and Awareness

To support compliance and awareness:

- All new employees are introduced to this Policy during induction.
- Refresher training and updates are communicated through internal HR systems and email communications.
- Managers and procurement staff receive guidance on identifying risks within supply chains and contractor relationships.

10. Monitoring and Review

The Board of Directors is responsible for ensuring this Policy is implemented and effective. The Policy will be reviewed annually or sooner if required by changes in legislation or business structure.

Performance will be monitored through:

- Supplier audits and due diligence reviews
- HR compliance checks (right-to-work, wages, etc.)
- Reporting and follow-up on any incidents or concerns raised

11. Related Policies and Documents

This Policy should be read in conjunction with:

- Modern Slavery and Human Trafficking Statement
- Whistleblowing Policy
- Code of Conduct
- Equality, Diversity and Inclusion Policy
- GDPR and Data Protection Policy

- Recruitment and Selection Policy

12. Approval and Ownership

This Policy has been approved by the Board of Directors of T G Holdcroft (Holdings) Ltd and applies to all subsidiaries.

Martin McCormick
Finance Director
2025