

## MODERN SLAVERY STATEMENT

### INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("the **Act**") and constitutes the slavery and human trafficking statement for Lookers Limited and its relevant subsidiaries for the financial year ending 31 December 2024.

Lookers Limited and certain of its subsidiaries (as listed at the bottom of this statement) are required by the Act to publish a statement in accordance with the Act.

The Lookers Limited Board annually reviews and approves this Modern Slavery Statement.

### OUR BUSINESS

We are one of the leading motor retail and aftersales groups in the UK. Our operations are carried out across the UK and Republic of Ireland. Our business consists of more than 180 sites (including non-franchised) representing 37 brands. We have around 5,900 directly employed staff, all of whom are based in the UK or the Republic of Ireland.

#### *Our workforce policies*

We seek to ensure transparency in our own business and in our approach to tackling modern slavery and we are committed to achieving the highest standards of ethical conduct in our business. We have policies and procedures in place to ensure that we comply with all relevant laws regarding voluntary employment and minimum ages for employment. We do not tolerate slavery, servitude and forced or compulsory labour and human trafficking in our operations. We comply with all working hours laws and commit to offering employees competitive compensation, at least in accordance with national wage and overtime laws. We commit to avoid any sort of child labour in our business operations consistent with the International Labour Organisations on child labour and expect the same standards from our suppliers.

#### *Due diligence*

The following processes are in place throughout our organisation to embed our values and mitigate the risk of modern slavery or human trafficking taking place within our organisation:

- *Robust HR processes:* we have HR and operational processes which reduce the risk of modern slavery and human trafficking. Our HR function is responsible for all recruitment activities and in doing so follows standard recruitment procedures. We use reputable employment agencies and temporary labour agencies in sourcing labour and conduct appropriate due diligence on any new agency we engage.
- *Whistleblowing procedures:* the Group operates various channels for concerns to be raised, including a confidential whistleblowing framework which allows concerns to be raised on a confidential basis to our Head of Compliance, or by escalation to an independent non-executive Director.

Throughout the year, the Group received no reported concerns regarding modern slavery in its operations. If such an issue was reported, the Group would immediately undertake a thorough investigation of the issue and if substantiated, the Group would put in place robust action plans to protect any victims and eliminate the issue.

We consider the risk of modern slavery taking place in the Group's business by taking into account:

- the geographical locations of our operations and the low prevalence of forced labour in these areas;
- the policies adopted by the Group;
- the Group's recruitment processes;
- the use of third-party contractors in our operations; and
- the absence of reports of concerns or incidents regarding forced labour,

we consider the risk of modern slavery and human trafficking occurring within the Group's operations to be relatively low and the arrangements described above to be proportionate and effective.

## **OUR SUPPLY CHAINS**

Our supply chains are predominantly the major international motor manufacturers who supply us with motor vehicles and aftersales parts. In addition, we partner with vehicle finance and insurance providers for the provision of finance and insurance products to our customers. We also contract with other suppliers for the provision of ancillary goods, services and equipment.

### *Supplier policies and procedures*

Our Code of Conduct ("the **Code**") for the supply of indirect goods and services sets out the minimum standards those providing goods or services to the Group are expected to comply with.

The Code includes specific requirements relating to employment conditions based on a fundamental respect for human rights and is clear that we will not tolerate any form of forced labour, bonded labour or child exploitation. The Code sets out our minimum requirements for workers' rights in areas such as remuneration, freedom of association, discrimination, first aid, working hours and working conditions. In general, all goods and services procured by the Group must be produced and provided in conformity with the United Nations Charter, Chapter 1X, Article 55, governing international economic and social co-operation with specific reference to workers' rights and working conditions.

### *Due Diligence*

Any new suppliers are required to complete a due diligence pack, which includes a modern slavery risk questionnaire, as part of the standard procurement tendering process. We require our suppliers to comply with the Act and prohibit any form of exploitation. Any suppliers found to have breached these obligations could face sanctions, including termination of our contract with them.

## **MEASURING THE EFFECTIVENESS OF OUR APPROACH**

As noted above, we operate a Group-wide incident reporting system so that staff can report any concerns, including in relation to the supply chain. We also have a whistleblowing policy so that issues of concern may be raised anonymously.

We have not identified any instances or indications of modern slavery and human trafficking in our supply chains or in our business. We continue to keep this under review.




TRAINING

All colleagues have an obligation to familiarise themselves with and comply with all our policies and procedures and receive specific training on incident management and whistleblowing. To raise awareness of modern slavery, this statement is also published on our internal intranet.

Signed: 

Signed by:



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Alex Smith, Lookers Limited

Chair

Date: July 2025

Company name (relevant subsidiary entities)	Company number
Addison Motors Limited	00714804
Addison TPS Limited	06261220
Benfield Pension Trustees Limited	04212523
Bolling Investments Limited	00100651
Bramall & Jones VW Ltd	06514534
Charles Hurst Dublin Limited	316961
Charles Hurst Limited	NI004882
Colbornes Trade Parts Limited	05902687
Colebrook & Burgess Holdings Limited	04366399
Colebrook & Burgess Limited	03410784
Drayton Group Limited	04136968
Dutton-Forshaw Holdings Limited	03456809
Fleet Financial Limited	NI030373
Fourways Vehicle Solutions Limited	04488178
Get Motoring UK Limited	05412648
Harpers Carlisle Limited	02565144
Lomond Motors Limited	SC184583
Lomond Motors (East) Limited	SC304405
Lomond TPS Limited	SC319410
Lookers Colborne Limited	04172337
Lookers Leasing Limited	05654532
Lookers Motor Group Limited	00143470
Lookers Motor Holdings Limited	00601147
Lookers Pension Plan Trustee Limited	04176044
MB South Limited	01097144
NNK Holdings Limited	11512691
S.Jennings Limited	00120996
S. Jennings Group Limited	05470397
The Dutton - Forshaw Group Limited	03456828
The Dutton-Forshaw Motor Company Limited	00680734
Warwick Holdings Limited	03034706