



MODERN SLAVERY STATEMENT – HARTWELL PLC

STATEMENT

The Modern Slavery Act 2015 requires manufacturers and retailers doing business in the UK which supply goods or services and have an annual turnover exceeding £36 million to disclose information regarding their policies to eradicate slavery and human trafficking from their supply chain and within their business.

Our business

The Hartwell Group PLC comprises, (11) dealerships and a number of subsidiaries including: Hartwell Finance Ltd, Hartwell Automotive Group Ltd. All sites located geographically in the UK.

The Group's principal activities include: vehicle distribution, Sales, Service and associated activities, Property developments and Investments. Hartwell Finance provides Finance for the provision of Insurance products to the Motor Trade and is regulated by the FCA.

Hartwell is dedicated to providing its employees with a positive working environment which complies or exceeds the requirements of all applicable legislation including human rights, anti-discrimination and fundamental rights at work.

Written policies and procedures.

The rules and procedures by which they should treat fellow employees. This includes:

- Transparent and fair behaviour, such as protecting human rights
- Compliance with legislation, including fundamental rights at work - in particular freedom of association and elimination of discrimination throughout employment.
- Compliance review Procedures and Training requirements to ensure awareness is maintained by all staff.

Human Rights.

Hartwell PLC regularly ensures that all areas of their businesses are compliant with their Code of Ethics and human rights standards and that all employees are treated in a fair and transparent manner. This includes adherence to the Working Time Directive and the Minimum Wage.

Our suppliers

We adopt a stringent procurement process. Suppliers are reviewed and audited to ensure safe working conditions and to ensure they adopt adequate policies which meet or exceed Hartwell's purchasing requirements.

Notwithstanding the steps Hartwell takes in this regard, it is ultimately our suppliers' duty to respect the applicable laws and ethics on human rights.

Violations



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Hartwell PLC have a zero tolerance policy towards violations of the laws banning forced labour, slavery and human trafficking. Contractual agreements permit the termination of suppliers for a single violation

Our Principles on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our principles reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to help eradicate slavery and human trafficking.

1. Sustainable Growth and Development.

This agreement promotes a responsible social dialogue across the Hartwell Group. This agreement promotes sustainable development and commitment to the following areas:

- Respect for fundamental social rights;
- Social responsibility to employees; and
- Supplier and sub-contractor relationships

Our commitment to fundamental social rights focuses on the effective abolition of child labour, forced labour and discrimination in respect of employment and employee occupations. We share our views with suppliers who are required to comply with Hartwell policies.

2. Respect of Employees' Fundamental Rights

Employees' and Supplier Employees' rights are respected and valued at Hartwell and this is reflected in the Code of ethics and the Staff Handbook, which reiterates Hartwell's commitment to:

- Health and Safety
- Working Conditions
- Equal Opportunities & Diversity

3. Hartwell Whistleblowing Policy



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This procedure offers further assistance in combating modern slavery, as it enables employees to bring issues such as slavery and human trafficking to the company's attention utilising an agreed process.

Further steps

We will always work to the highest professional standards and shall continue our efforts in eliminating acts of modern slavery within our business and supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for this financial year.

Approved by: Hartwell Senior Management Team (November 2025)