

Sytner Group Modern Slavery Statement

(Prepared in accordance with Section 54 of the Modern Slavery Act 2015)

Sytner Group is one of the UK's leading automotive retail organisations, representing a portfolio of globally recognised and premium automotive brands across more than 100 locations nationwide. As the UK's largest motor retailer by revenue, we operate at significant scale, employing approximately 9,000 colleagues and retailing over 166,000 new and used vehicles in 2025.

Sytner Group upholds consistently high standards of integrity, ethical conduct and respect for human rights across our operations and business relationships.

Sytner Group Limited acts as the holding company for a number of trading entities operating motor dealerships across the UK, including:

- Agnew Autoexchange Limited
- Agnew Commercials Limited
- Agnew Leasing Limited
- Car Shops Limited
- Cruickshank Motors Limited
- Goodman Retail Limited
- Goodman TPS Limited
- Graypaul Motors Limited
- IAPCB Limited
- Isaac Agnew Limited
- Maranello Concessionaires Limited
- R Stratton & Co Limited
- Rybrook Cars Limited
- Sytner Cars Limited
- Sytner Group Limited
- Sytner Limited
- Sytner Vehicles Limited
- Trade Parts Specialist (NI) Limited

Sytner Group is headquartered in Leicester, England and operates exclusively within the United Kingdom. Our ultimate parent company is Penske Automotive Group Inc., headquartered in Detroit, USA. This statement applies to all Sytner Group entities listed above.

The automotive supply chain is complex and globally interconnected, involving multiple tiers from raw material extraction through to component manufacturing and final vehicle assembly, spanning regions including Europe, Asia, Africa and the Americas.

As a motor retailer, Sytner Group's direct contractual relationships are primarily with vehicle manufacturers, including BMW, Bentley, Audi, Mercedes-Benz and Jaguar Land Rover. Due to this structure, we have limited direct visibility beyond first-tier suppliers.

Our manufacturer partners are bound to undertake supply chain mapping, due diligence and risk management activities within higher-risk jurisdictions and uphold high standards of ethical conduct and human rights compliance, including alignment with the Modern Slavery Act 2015 and equivalent global frameworks.

We maintain oversight through review of manufacturer modern slavery and sustainability disclosures, which inform our understanding of upstream risks¹. While we place trust on our manufacturer partner's controls, we recognise that this does not remove our responsibility, and we continue to strengthen our oversight of upstream supply chain risks.

Due Diligence Processes

We undertake established due diligence processes to identify and mitigate risks of modern slavery and human trafficking within our operations and supply chains. This includes:

- Supplier questionnaires addressing modern slavery risks
- Sign-up to our supplier Code of Conduct
- Review of supplier policies and practices
- Contractual provisions requiring compliance with the Modern Slavery Act 2015
- Supplier audits, including site visits and documentation reviews where appropriate

We conduct annual supplier due diligence assessments requiring certain high-risk suppliers to complete structured questionnaires addressing modern slavery risks and to confirm compliance with our standards.

As part of our modern slavery due diligence process, suppliers are required to formally acknowledge and adhere to Sytner Group's Supplier Code of Conduct, reinforcing our expectations in relation to ethical labour practices, human rights and legal compliance. Alternatively, or in addition, suppliers are subject to separate contractual obligations to ensure their compliance with the law and our standards.

This annual process enables us to monitor supplier performance on an ongoing basis, identify emerging risks and ensure continued alignment with our modern slavery requirements.

Internally, we operate controlled recruitment and onboarding processes designed to mitigate the risk of modern slavery. All Sytner Group colleagues are onboarded through our internal HR procedures and are subject to robust right to work checks in line with UK legal requirements prior to commencing employment.

These checks are verified through the review of original identification documents and, where applicable, Home Office online verification systems. All checks are conducted by trained personnel, recorded within our HR systems and retained in line with statutory requirements to ensure full compliance and auditability.

All colleague data is securely stored within a thirdparty online HR system (DLX), providing efficient, realtime access to records for audit purposes and enabling checks to be reviewed consistently and promptly.

We maintain a programme of periodic internal audits, conducted by a dedicated internal audit team, to ensure that onboarding and right to work processes are consistently applied and remain compliant with current legislation.

In addition:

- All employees are provided with written contracts outlining terms and conditions of employment
- Employment practices are overseen by qualified HR professionals

We recognise that the highest risk of modern slavery exists within our third party suppliers and their wider supply chains.

Our risk is focused on our direct suppliers, where we maintain direct relationships and oversight. Suppliers identified as higher risk are prioritised for enhanced due diligence, including targeted audits and ongoing monitoring.

The responses provided through the annual supplier due diligence questionnaires form a critical component of our structured risk assessment process. This information is used to inform the identification, evaluation and classification of risk across our supplier base, enabling us to prioritise higher-risk businesses for enhanced due diligence, targeted audits and ongoing monitoring.

Modern Slavery Risk Matrix

	IMPACT (Severity of Risk)		
LIKELIHOOD	Low	Medium	High
High	Medium Risk (Monitor)	High Risk (Priority)	Critical Risk (Immediate action)
Medium	Low Risk (Monitor)	Medium Risk (Review)	High Risk (Priority)
Low	Low Risk (Routine)	Low Risk (Routine)	Medium Risk (Review)

Cleaning or Valeting suppliers that are categorised as high and critical risk are prioritised for audit, ensuring resources are focused on areas of greatest risk. We categorise based on their answers of the annual supplier questionnaire.

Risk is assessed on:

Geographic Risk

Where the activity takes place.

- Regions known for forced labour, human trafficking, or child labour (heavily concentrated in highly populated urban regions)
- Suppliers with links to countries with weak labour laws, poor enforcement, or high corruption

Sector / Industry Risk

Certain industries present a higher risk of modern slavery e.g.:

- Valeting
- Cleaning
- Construction
- Providing temporary labour
- Delivery companies

Supply Chain Complexity

Complex supply chains make it more challenging to accurately assess modern slavery compliance and, hence, present a higher level of risk.

Workforce Characteristics

The following categories of worker are considered to be at a higher risk of modern slavery:

- Self-employed workers
- Migrant workers
- Temporary or agency workers
- Low literacy or non-native language speakers

Supplier's Recruitment Practices

How a supplier's workers are sourced affects risk.

The following factors are considered in particular:

- Whether a supplier uses third-party recruiters
- Charging recruitment fees for workers
- The standard of a supplier's contracts with its employees or workers
- Whether appropriate ID documentation is retained

A Supplier's Business Model & Cost Pressures

A supplier's internal pressures and business model may encourage a modern slavery risk e.g.:

- Aggressive cost-cutting or tight margins
- Unrealistic delivery timelines
- Incentives that prioritise cost over ethical sourcing

Supplier Behaviour & Controls

How well suppliers manage risk e.g.:

- The standard of their policies on modern slavery
- Audit results or refusal to be audited
- Whether there is an adequate whistleblowing reporting line
- The quality of grievance mechanisms for workers
- The presence and standard of training or awareness programmes

Previous Incidents or Red Flags

Historical or current warning signs:

- Worker complaints
- High staff turnover
- Unusual working hours or conditions
- Media reports or legal cases

5 Effectiveness in Combating Modern Slavery

We maintain an established programme to assess the effectiveness of our approach.

During the reporting period, Sytner Group conducted 14 supplier audits.

Sytner Group requires all suppliers to ensure that workers engaged in delivering services are paid no less than the National Minimum Wage after any deductions. Suppliers failing to meet this requirement will not be engaged or will have their contracts terminated.

Although certain workers, such as those engaged on a self-employed basis, may fall outside statutory National Minimum Wage requirements, Sytner Group applies a higher ethical standard. We expect all individuals working within our supply chain to receive fair and transparent pay, recognising that this is fundamental to preventing labour exploitation and upholding basic worker rights.

In 2025, as part of our enhanced controls within higher-risk sectors, including valeting services, we require suppliers to undertake regular identity verification checks, typically conducted on a monthly basis. These checks ensure that the individual working on-site corresponds with the identification provided at the point of onboarding.

This control is designed to mitigate risks associated with worker substitution, unauthorised labour and fraudulent employment practices, strengthening transparency and accountability within our supply chain.

Two suppliers were identified as not meeting National Minimum Wage requirements. Immediate corrective actions were required, with suppliers expected to demonstrate compliance within defined timeframes. Continued non-compliance would result in termination of the business relationship.

Where suppliers fail to meet required standards, we do not engage or continue trading relationships.

Overall, our audits identified:

- Variable awareness of modern slavery risks
- Training gaps at frontline level
- Inconsistent worker awareness
- Limited reporting mechanisms

In response, we have:

- Maintained targeted toolbox talks
- Provided standard awareness materials
- Extended access to our whistleblowing hotline

We measure effectiveness through:

- 98% training completion rate (target: 100%)
- Audit outcomes and corrective actions
- Supplier compliance levels
- Whistleblowing reports

All Sytner Group colleagues' complete annual mandatory modern slavery training via an interactive e-Learning module with assessment, with currently a 98% completion rate.

The training includes definitions, red flag indicators, internal policies and reporting procedures, ensuring colleagues can identify and respond to risks. There is also a test at the end of the learning, to ensure understanding which must be passed.

Completion of this training is mandatory for all colleagues. Modern slavery is a shared responsibility and not solely the concern of those involved in recruitment. As it can impact individuals across all sectors and in everyday life, it is vital that everyone is informed and remains vigilant.

We have long maintained a Modern Slavery awareness poster, displayed across all our businesses, including valet bay areas where thirdparty operative's work. The poster provides guidance and includes direct access to our confidential whistleblowing hotline, ensuring concerns can be raised safely and anonymously.



Sytner Group

Modern SLAVERY

Modern slavery traps millions of people worldwide. It is a truly despicable and inhumane crime that strips a person of their identity and right to freedom.

Our Company is committed to preventing the use of slavery in our business and our supply chain. Help us meet this commitment.

Look out for any signs of slavery and report it immediately.

Signs to look out for:

- Physical and psychological abuse.
- Restricted movement.
- Poor living conditions.
- Lack of personal belongings, such as their passport.

DON'T IGNORE - ACT IMMEDIATELY
How to report slavery:

 Inform your Manager
  Blow the whistle
  Speak with your Divisional HR Manager

SPEAK UP

Call our confidential Navex Global line: **0808 196 5721**

Sytner Group recognises the importance of continuous improvement in addressing modern slavery risks.

We have maintained robust modern slavery due diligence processes since the introduction of the legislation and consider our aim is to be industry-leading.

Building on our established approach, we will continue to strengthen our controls, oversight and engagement activities during 2026 and 2027.

Our key priorities include:

- **Enhancing supplier risk assessment**
Further develop our supplier risk classification framework to support consistent identification, assessment and prioritisation of higher-risk suppliers across the business.
- **Expanding targeted audit activity**
Increase the number and scope of supplier audits, with a continued focus on higher-risk companies such as cleaning and valeting services.
- **Strengthening upstream supply chain visibility**
Continue to enhance our understanding of risks beyond Tier 1 suppliers through closer engagement with manufacturer partners and ongoing review of supply chain disclosures.
- **Increasing frontline awareness and engagement**
Expand awareness initiatives for higher-risk worker groups, including reviewing the effectiveness and reach of toolbox talks and on-site communications.
- **Maintaining high training standards**
Sustain high completion rates for mandatory modern slavery training, while enhancing training content where appropriate to reflect emerging risks and evolving best practice.

Sytner Group remains committed to embedding strong controls and maintaining a proactive, risk-based approach to preventing modern slavery across its operations and supply chains.

We understand that it is everyone's responsibility to be vigilant, and act where required. Every human has the right to live freely and so all of us – individuals, businesses and communities have a responsibility to do what we can to look after each other and eradicate modern slavery.

Sytner Group remains committed to preventing modern slavery and human trafficking across all areas of its operations and supply chains.

This statement is approved by the Board of Directors and is reviewed and updated annually.

A handwritten signature in black ink, appearing to be 'John Cragg', written over a horizontal line.

John Cragg, Chief Executive

August 2026