

Modern SLAVERY Statement 2025

Modern Slavery Act Statement

Sytner Group upholds the highest standards of ethical behaviour and integrity.

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. Sytner Group has a zero-tolerance approach to Modern Slavery, and is fully committed to preventing slavery and human trafficking in our operations and supply chain. We are committed to protecting our organisation and those people at risk from exposure to slavery or human trafficking, whether our direct employees or those working for third party suppliers.

We continue to seek to identify and manage any potential risks associated with Modern Slavery and endeavour to put in place safeguards to ensure that our zero tolerance to Modern Slavery is implemented within our businesses and that those with whom we have direct contractual arrangements also have similar safeguard in place in an effort to eradicate Modern Slavery.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the Modern Slavery statement for the financial year ending 31 December 2024 for the Sytner Group of companies.

Sytner Group John Cragg, Chief Executive July 2025



Organisational Structure and Background

Sytner Group represents the world's most desirable car manufacturers in over 100 retailing locations across the UK. Sytner Group remains the UK's largest motor dealer group by revenue, employing just under 10,000 people and retailing over 205,000 new and used cars in 2024.

Despite our size and scale, we are proud to still retain a strong 'Sytner family' culture across our business and throughout all of our dealerships. Our success has been built by every colleague working together and contributing to our one team ethos. We strive to deliver an exceptional customer experience; our colleagues are highly trained, enthusiastic, knowledgeable and driven to deliver our fundamental commitment to our customers; we strive to get it right first time and make each and every interaction special. Our ultimate aim is to be considered the best company to work for in the industry and the best company to do business with.

Sytner Group Limited is Sytner Group's holding company. Sytner Group has numerous trading entities, the majority of which operate motor dealerships throughout the United Kingdom under a portfolio of well-known brands.

Sytner Group is headquartered in Leicester, England. We are proud of our Head Office being based in Leicester - which is one of the most diverse cities in the UK. We are committed to creating equitable environments where everyone is supported to be their best self. Our aim is to reflect our customers and communities we serve. We aim to be a business which upholds, shares and sets best practice within the sector and outside of it.

Sytner Group's ultimate parent company, Penske Automotive Group Inc, is headquartered in Detroit, Michigan in the USA. This statement relates solely to the Sytner Group of companies:

- 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

2024 by the numbers...







Our Colleagues

Risks relating to modern slavery for people employed directly by Sytner Group in our own operations are managed primarily through our colleague policies and procedures.

It is a fundamental policy of Sytner Group to conduct business with honesty and integrity and in accordance with the highest standards of ethics, equality and fair dealing Sytner Group's employees play a key role in maintaining our high standards and ensuring that we are compliant in all aspects of regulations set forth by the UK Government.

In the UK, we manage the risk of modern slavery by ensuring that the people we hire have the right to work and that their basic rights as workers are protected. Our internal dedicated human resources experts manage the employment process, undertaking due diligence and ensuring all new joiners are issued with a contract of employment which confirms their working hours and pattern.

Our colleagues are all provided with a written contract of employment as well as access to a company handbook which contains the policies that govern their employment. The handbook sets out Sytner's Group's policy and procedures in respect of Modern Slavery and human trafficking in order to inform and educate our colleagues of the risk posed by Modern Slavery and how it should be tackled.

The handbook is regularly reviewed and amended as necessary. Each colleague has a personal responsibility to read the handbook, as well as to ensure that they fully understand the obligations of Sytner Group, the colleague's own duties and obligations and the consequences associated with any breach of those obligations.

We provide a confidential whistleblowing helpline and encourage our colleagues to report any concerns related to the direct activities, or the supply chain of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. We display and promote our confidential employee reporting hotline at all of our sites.

We require all our colleagues to complete mandatory online Modern Slavery e-Learning annually. The interactive e-Learning increases awareness further and ensures that all of our colleagues can recognise and identify instances of modern slavery occurring both inside, and outside of work.

We also display our Modern Slavery poster in colleague areas throughout all of our sites which gives an overview of the signs to look out for and how employees can report concerns regarding Modern Slavery.

Our Third-Party Commercial Partners, Suppliers and Supply Chain

Risks relating to modern slavery for people employed directly by Sytner Group in our own operations are managed primarily through our colleague policies and procedures. We therefore consider that the most significant risk of modern slavery or human trafficking is in relation to our third-party partners and their respective supply chains.

The Motor Trade supply chain is complex and can involve numerous companies and businesses across the globe. The breadth, depth and interconnectedness of the automotive supply chain make it challenging to effectively manage and mitigate the risk of modern slavery and human trafficking.

The nature of the motor industry is such that our supply chain for new and used vehicles is multifaceted: any given vehicle will have its own supply chain for the various component parts for example. We understand that ultimately our vehicle supply chain begins with the sourcing and manufacturing of the raw materials required for any part of a vehicle. As our relationship is with the vehicle manufacturer and not with their supply chain, we take steps to ensure that our suppliers match our high standards and the ethos of the Modern Slavery Act 2015.

Sytner Group is committed to ensuring that there is transparency in our own business concerning the approach that we take to tackle Modern Slavery and we demand the same high standards from all of our contractors, suppliers and other business partners.

We recognise the importance of identifying high-risk areas where human rights may be violated, including modern slavery, and assess the risk specific to our suppliers, their supply chains and our industry more generally.

Specifically we:

- Assess the risk of slavery and trafficking through our supplier due diligence process; this due diligence includes a requirement for suppliers to complete questionnaires on issues relevant to Modern Slavery and to provide full disclosure of their own policies and approach.
- Issue our Modern Slavery Policy and Supplier Code of Conduct to suppliers, which highlights the standards of compliance required from our third-party suppliers and contractors.
- Impose contractual obligations on our suppliers and commercial partners as necessary to ensure that they shall comply with the Modern Slavery Act 2015 and take positive that each of its own subcontractors and suppliers involved in the provision of goods and services will also act in compliance with the Modern Slavery Act and the principles set out within our documentation.
- Conduct supplier audits. Audits include visiting supplier premises and/or requiring visibility to relevant paperwork that gives us confidence and reassurance that those employed or working for or on behalf of the supplier company are not subject to Modern Slavery in any form.
- We do not conduct business with any thirdparty supplier or contractor who do not pay workers the national minimum wage or national living wage (as appropriate) after deductions.
- We will not engage the services of third-party supplier or contractor who does not conform to the Government minimum wage thresholds and pay all workers, regardless of employment status.

We have identified the cleaning and valeting sectors as areas of particular risk. Cleaning and valeting services are provided to our dealerships across the country. These areas remain an area of particular focus.

Going Forward

As a Company we will continue to assess and develop our approach to respecting human rights and preventing Modern Slavery throughout the next year.

These measures will include:

- The continued monitoring and evaluation of our supplier questionnaires and audits.
- The development of our supplier onboarding process and of due diligence procedures to better ensure that any modern slavery risks are appropriately identified and addressed at the earliest opportunity.
- Continue to assess and monitor the risks within our operations and throughout the applicable supply chain;
- Provide training on modern slavery awareness and prevention, updating as necessary.

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.

