

Modern Slavery Statement

This statement applies to Halo Accident Repair Centre Ltd. (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year April 2025 – March 2026.

Halo Accident Repair Centre is an accident repair group with over 35 locations across England, Scotland and Wales with the Head Office located in Bognor Regis. All work is wholly carried out in the United Kingdom. The Business is controlled by our Director Team and IRS.

DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in England and Wales.

SUPPLY CHAINS

The Organisation is one the largest Independent accident repair centres in the UK sourcing a wide variety of collision parts. Our supply chain extends to parts manufacturers in UK, Europe and parts of Asia, due to the complexity of our supply chain, there are often many different levels of suppliers between a dealer and the source of the raw materials obtained by the manufacturers that we engage with. We therefore require that our suppliers and manufacturers adhere to the same ethical trading principals that we adhere to.

POTENTIAL EXPOSURE

In general, the Organisation considers its exposure to slavery/human trafficking to be extremely limited and we take steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Pay National Minimum wage
- Right to work in the UK
- Zero tolerance policy towards modern slavery
- Equal opportunities of employment
- Employees are able to speak up without fear of reprisals (whistleblowing policy)
- Review our supplier base to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- measures in place to identify and assess the potential risks in its supply chains;

KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- The number of reports of modern slavery
- The number of investigations into modern slavery
- The number of cases of modern slavery

POLICIES

The Organisation has the following policies which further define its stance on modern slavery which can be found on the Employee Guide:

Equality, Diversity and Inclusion (EDI) policy – within employee handbook Whistleblowing policy – within employee handbook Recruitment and selection policy – within EDI policy

COMPLIANCE AND CONCERNS

All concerns regarding modern slavery should be addressed to the Head of People Operations via people@haloarc.co.uk and who will then undertake relevant action with regard to the Organisation obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval...30th June 2025...

Signed:...Georgia Golding...

Head of People Operations

Date...30th June 2025...