H.R.OWEN

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

H.R. Owen covers the following entities:-

Bodytechnics Limited
Broughtons of Cheltenham Limited
H.R. Owen Dealerships Limited
H.R. Owen Insurance Services Limited
H.R. Owen Plc
H.R. Owen Servicing and Repairs Limited
Jack Barclay Limited

POLICY

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, forced and compulsory labour, sexual exploitation, emotional and physical abuse, people being held against their will and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. H.R. Owen has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business.

We are also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout. We expect the same high standards from all our suppliers and other business partners.

This policy applies to all H.R. Owen employees, contractors, external consultants and third- party representatives.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Everyone is responsible for ensuring they understand and comply with this policy.

Training on this policy will be provided so everyone understands the signs of modern slavery and what to do is they suspect that it is taking place within our supply chain.

COMPLIANCE WITH THE POLICY

You must ensure you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for H.R. Owen. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business at the earliest stage and this can be reported in accordance with our Whistleblowing Policy if you so wish.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be a mistake. If you believe you have suffered any such treatment, you should inform your manager or Human Resources immediately.

Any employee who breaches this policy will face disciplinary action, which could result is dismissal for misconduct or gross misconduct.

TRAINING

Through our Induction programme employees are encouraged to identify and report any potential breaches of the company's anti-slavery and human trafficking policy.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes H.R. Owen's slavery and human trafficking statement for the financial year April 2024 to March 2025.

This statement was approved by Ken Choo, CEO.



Signature:……..

Date: 17th Nov 2026

November 2026