



EMS S48939

HLI 023 Modern Slavery Statement

MODERN SLAVERY ACT 2015

Issue 1 Rev 12

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out steps Holts has taken and is continuing to take to understand and minimise the potential risk of modern slavery in its business and supply chains. For over 100 years, Holt Lloyd International Ltd ("Holts") has been manufacturing and delivering leading brands and high performing appearance, repair, maintenance, and winter products to the automotive aftermarket. Today, with the Holts, Redex, Simoniz, Prestone and Adams brands, Holts continues to be the international automotive product supplier of preference. Holts is a division of Performance Fluid Experts (PFX) Group, which competes in global markets to bring exceptional brands and high-quality products that care for the everyday needs of consumers.

Our commitment to the principles of the Modern Slavery Act 2015

Holts is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal-opportunities employer, Holts is committed to creating and ensuring a non-discriminatory and respectful working environment for all its staff. Holts wants all its staff to feel confident that they can expose wrongdoing without any risk to themselves.

Holts' recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment. Holts does not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. Holts maintains the following policies which are accessible to all staff:

- **PFX - C-Legal Anti-Bribery Policy**
- **HLI - 002 Anti-Boycott Policy**
- **HLI - 004 Conflict of Interest Policy**
- **HLI - 027 Code of Ethics & Business Conduct**
- **HLI - 039 Whistleblower Policy**
- **HLI - 040 Workplace Discrimination, Harassment, Violence & Victimisation Policy**
- **HLI - 042 Environmental Policy Statement**

Our supply chain

As a responsible supplier and employer, Holts makes every effort to ensure that all the products we supply to our customers are manufactured or sourced in an ethical manner. We work with our suppliers to confirm that the practices inherent in those suppliers comply with all relevant legislation regarding employee working conditions.

In addition, Holts are members of SEDEX and are regularly audited both by SEDEX and by our customers, many of whom are major, multinational retailers, to ensure regulatory compliance.

Embedding the principles

The principles will continue to be embedded by the following activities:

- Provide awareness training to staff on the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensure that consideration of the modern slavery risks and prevention are added to Holts' policy review process as an employer and procurer of goods and service.
- Ensure Holts' strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Continue to take action to embed a zero-tolerance policy towards modern slavery.
- Ensure that staff involved in buying/procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

Conclusion

In view of the policies and processes outlined above, we have a framework that adequately safeguards Holts against slavery and human trafficking within its own business and that of its suppliers. We believe that there is a very low risk of slavery and human trafficking taking place within Holts or our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Holts' slavery and human trafficking statement for the financial year ending 2025. This statement was approved by the board of Holt Lloyd International Ltd on 21st August 2026. This statement will be reviewed and updated annually.



Bruce Ellis President and Managing Director Holt Lloyd International

21st August 2026