

Introduction

This is Halfords' 10th Modern Slavery Statement which outlines the steps we take as a business to prevent slavery and human trafficking in our own operations and supply chains.

Previous statements can be found on our [Group website](#).

This statement has been published in accordance with the [Modern Slavery Act 2015](#) ("MSA"). It sets out the steps taken by Halfords Group PLC ("Halfords") during the financial year 2026 to prevent modern slavery and human trafficking in its business and supply chain.

As defined by the MSA, modern slavery encompasses slavery, servitude, forced or compulsory labour and human trafficking. Our commitment to respecting human rights, including the prevention of modern slavery, is embedded within our Group policies and [Global Sourcing Code](#) ("GSC"). We recognise our responsibility to manage our business and supply chains in a way that identified and mitigates the risks of modern slavery and, where necessary, takes appropriate action to remediate any identified adverse impacts.

We acknowledge the UK Government's release of the updated MSA in March 2025 with the aim to raise reporting standards and are committed to continually improving our controls and aligning more closely with its recommendations, progressively embedding the guidance across our functions and future statements.

Our business

Halfords is the UK's leading provider of motoring and cycling products and services for consumers and businesses. We serve customers through our nationwide network of retail stores and garages, mobile expert vans and digital channels, including halfords.com and tredz.co.uk, with options for store collection and direct home delivery. We also support a growing B2B operation, including fleet servicing and maintenance, Trade Card, Cycle2Work, Commercial Fleet Services and Avayler SaaS businesses.

Halfords employs over 12,500 colleagues across the UK and Ireland and our services span across:

- 370 Halfords Retail stores
- 496 consumer garages
- 92 commercial depots
- 21 mobile hubs
- 250 mobile expert vans
- 550 commercial fleet services vans
- Customer contact centre
- Click & Collect in-store
- B2B services, including Cycle2Work (C2W), Trade card and Avayler

Over the better part of a decade the Halfords Group has evolved: we have expanded our service capability and grown our B2B proposition to create a stronger and more resilient business for the future. Underneath all this change, we are guided by an updated corporate purpose which reflects what has been in our DNA for more than a century: **we keep the nation moving with trusted experts who love to help.**

Our supply chain

We have two distinct supply chains: Goods for resale (“GFR”) and Goods not for resale (“GNFR”), which includes the products and services we procure for the everyday running of our business.

GFR

The GFR products we sell are sourced both directly and indirectly from a broad range of national and international suppliers. Our international supplier relationships are managed by a dedicated Halfords Global Sourcing (“HGS”) team, with colleagues based in Hong Kong, Taiwan, Shanghai and the UK. Our Near Sourcing (“NS”) team are UK based and cover products sourced within Europe including the UK.

GNFR

GNFR covers the goods and services Halfords buys to operate, support and develop the business. This includes key spend categories such as technology, logistics, marketing, property, corporate and professional services. GNFR sourcing is managed through a centralised Group Procurement function with category expertise and structured procurement processes designed to assess supplier capability, capacity, value and fit with Halfords’ requirements.

Our policies and training

We are committed to maintaining high ethical standards within our business and supply chain. We have clear policies that ensure a consistent approach to the standards of operations and behaviours we expect from our colleagues and business partners. These policies include, but are not limited to:

- Health and Safety Policy
- Environmental Management Policy
- Global Sourcing Code & Data Protection Policy

Halfords Group sources products from many suppliers both within the UK and overseas. All are bound contractually by the Group’s policies as detailed within the Global Sourcing Code.

In addition, we maintain policies and training that further protect our workforce and uphold ethical practices, including but not limited to:

Mandatory training:

- Equality, diversity & inclusion
- Modern slavery
- Sexual harassment in the workplace

Policies and procedures:

- Whistleblowing Policy
- Group Health and Safety Policy
- Disciplinary Policy
- Safeguarding Policy
- Grievance Policy
- Right to work documentation and employee contract

The Group’s Whistleblowing Policy enables Halfords’ colleagues and workers within the supply chain to report concerns on matters affecting the Group or their employment, without fear or recrimination. We have continued our partnership with AAB People (previously SeeHearSpeakUp) to operate our Whistleblowing and reporting through phone, email and web-based channels. This is supported with a dedicated People Advice Hotline and specific internal inboxes for Whistleblowing and Sexual Harassment reporting.

Access to AAB is advertised through our colleague benefits platform Wheels, posters that are distributed to all stores, autocentres, distribution centres and support centre alongside communication to our suppliers through the GSC.

Governance

We require all suppliers (GNFR AND GFR) to sign our GSC as part of their onboarding process. Our GSC sets out the principles that are instrumental in enabling both our commercial strategy and Environmental Social and Governance (ESG) strategy. The GSC enforces our commitment to respect human rights and uphold international standards, including United Nations (“UN”) Guiding Principles on business and human rights and the Organisation for Economic Cooperation and Development (“OECD”) Guidelines for Multinational Enterprises.

The GSC is used to detail the minimum standards to which we expect our suppliers and their own business partners to adhere to. The GSC outlines expectations in the areas of environmental management, responsible sourcing, safe working practices and human rights – including modern slavery.

Our commitment to respect human rights is based on the International Bill of Human Rights, consisting of:

- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The International Labour Organisation’s (“ILO”) Declaration on Fundamental Principles and Rights at Work

We only trade with those who comply fully with our GSC, and in the event of any failure to do so, we reserve the right to end the business relationship and cancel outstanding orders.

We recognise that in the event of non-compliance, withdrawal of our business may cause severe hardship to those employed. Therefore, our preference is to work with our suppliers in partnership to achieve compliance and carefully review progress made before considering severing relationships.

For our top spend suppliers across the Group we stipulate their engagement with our EcoVadis supplier sustainability assessment programme, ensuring they have an EcoVadis sustainability scorecard that covers in detail labour, human rights and ethics as part of the four pillars of the assessment.

In GNFR we are proactively strengthening our supplier shortlisting process by introducing an initial pre-qualification process for all suppliers. This will include gathering information from supplier that demonstrates their ESG methodologies and controls, including modern slavery risk and remediations.

The Environmental Social Governance (ESG) Committee is comprised of Non-Executive Directors and is a committee of the Board. The Committee’s remit is to ensure our ESG strategy remains effective; sets appropriate targets; and monitors progress against key targets and initiatives. Responsible sourcing remains a key part of our ESG strategy and the Committee has remained informed on our ongoing due diligence developments.

Our ESG Steering Group, which comprises of Directors within the business, is responsible for delivery of our targets and progress in this area. The Steering Group reports this to our Executive Team and ESG Committee respectively.

Risk Management & Due Diligence

Like many retail businesses that operate globally, we consider the risk of modern slavery to be greatest within our GFR product supply chain and our sourcing of 'serving staff' through our GNFR procurement processes. All suppliers go through a commercial risk assessment, which has criteria that highlight the modern slavery risk for these specific industries. A more comprehensive approach is being developed to encompass multiple business areas to further enhance this process.

Our own-brand GFR product factories are mapped within a third-party risk management system ("EcoVadis IQ") using Tax identifiers and DUNS numbers. This provides us with a verified risk assessment at a country and industry level, determining our audit frequency to support our auditing programme.

Our auditing frequency is defined by the EcoVadis risk assessment, with higher risk factories audited on a yearly basis and lower risk bi-annually. We require all high-risk suppliers managed by HGS to provide us with an ethical audit from one of our accepted partners (or our own through BSCI). This year we have included previously out of scope regions within Europe and the UK that had been deemed as low risk due to geographical location, thus further strengthening our risk management.

When non-conformities are identified as part of an ethical audit, we set corrective actions and remediation requirements and timelines for the factory to resolve.

As Halfords are not directly responsible for branded (proprietary) branded goods for resale, we instead ensure our requirements for ethical standards are understood and upheld through the agreement to adhere to the GSC.

During FY26 we continued our partnership with EcoVadis for supplier sustainability scorecards. We continue to maintain 125+ top group suppliers (by spend) with a valid scorecard. We offer individual consultation led support to those performing below the industry standard. We ask our suppliers to complete their reassessment each year to demonstrate their commitment to sustainable practices including ethical standards and expect suppliers to demonstrate meaningful improvements with each submission.

This programme ensures an objective, independent and consistent approach and offers us a window into a supplier's maturity in this space.

Stakeholder engagement

[Freewheel](#) by Ride for Freedom CIC.

We are pleased to continue our support of the Freewheel programme by Ride for Freedom CIC with donated bike accessories during the year. Ride for Freedom CIC aim to harness the universal appeal of cycling to raise awareness, educate and forge partnerships to end modern slavery and provide remedy to survivors.

Freewheel is a remediation programme that empowers survivors of modern slavery – women, children and men – to cycle to support their physical and mental health and wellbeing, building their independence and mobility to aid their rehabilitation into society.

In FY26 we partnered with Ride for Freedom CIC to offer supplementary modern slavery training videos which are hosted on our Colleague training platform. This is an e-learning video playlist that colleagues can watch in addition to their mandatory modern slavery training.

Modern slavery training and awareness

The modern slavery e-learning module continues as a mandatory part of our colleague core learning curriculum and is part of the colleague introduction.

This mandatory learning helps define the issue of modern slavery and importantly explains how to identify and raise any potential concerns.

We are communicating the important role all colleagues play in being vigilant and having the confidence to speak up.

As of August 2026, 95% of colleagues have completed the training module an increase of 3% vs last year (92%).

2026 progress

We continue to review policies and practices to ensure our response to modern slavery remains effective, recognising this is a process of continuous improvement.

Below we detail progress made this year and our commitments for next year.

Commitment	Status	Comments
Maintaining >90% of GFR spend covered by a signed GSC, with GSC build into the GNFR contractual agreements	✓	This has been maintained and the process has been automated
Further improve our GNFR ESG screening through the introduction of an enhanced pre-qualification process used in all high ESG impact renewals and new investments.	Ongoing	Following our initial assessment of the commitment, we have decided to expand the scope – therefore this moves into a more detailed FY27 commitment
Maintaining the number of top suppliers accounted for within the EcoVadis sustainability ratings platform	✓	This has been maintained
Continue to offer individualised support at a consultation-based level for suppliers that have scored below industry average within EcoVadis sustainability ratings platform in order to improve for their next submission	✓	Support has been offered, and suppliers have improved their scores
Enhanced support for the Freewheel remediation programme for victims of modern slavery with additional partnership activities	✓	A contractual agreement was in place for FY26 where we supported Ride 4 Freedom with additional funding in return for the supplementary e-learning video content
Maintain the >92% of colleagues that have completed the Modern Slavery Training	✓	This has been maintained, at 95% completion

During FY27 we are committed to...
Maintaining >90% of GFR spend covered by a signed GSC, with GSC build into the GNFR contractual agreements
A development of the expanded scope for our new pre-qualification questionnaire. Pulling together SME's from across the business to implement a single, consolidated qualification and due diligence process
Maintaining the number of top suppliers accounted for within the EcoVadis sustainability ratings platform
Maintain the >92% of colleagues that have completed the Modern Slavery Training

This statement was approved by our Board of Directors on 10th September 2026 and will be reviewed on an annual basis



Henry Birch
Chief Executive Officer