

## **INTRODUCTION FROM THE MANAGING DIRECTOR**

We are committed to improving our practices to combat slavery and human trafficking.

## **STRUCTURE OF ORGANISATION**

We are a provider of vehicle rental services and mobility solutions. Europcar Group UK Limited is the main operational entity in the UK. It is a wholly owned subsidiary of Europcar UK Limited. All of the UK companies are ultimately owned by Europcar Mobility Group., S.A., which is a French-registered company with headquarters in Paris.

The UK Group has its head office and rental stations/trading locations in the UK and operates in the corporate and leisure markets.

The Europcar Mobility Group, as a whole, has an annual worldwide turnover (including subsidiaries) of at least £36 million.

## **OUR BUSINESS**

Our business is organised into seven functions: Finance, Fleet, Revenue and Capacity Management (“RCM”), Human Resources, Legal, Operations and Sales and Marketing.

## **OUR SUPPLY CHAINS**

Our supply chains include sourcing vehicles from vehicle manufacturers and general purchasing supply contracts, e.g. vehicle valeting services, outsourcing contracts, vehicle supplier subcontractors, agencies and franchisees.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **DUE DILIGENCE AND RISK ASSESSMENT PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we:

- have policies in place to ensure that suppliers and subcontractors are capable of meeting our requirements, through stringent supplier take-on procedures; and
- strive to build longstanding relationships with suppliers and subcontractors and make clear our expectations and values.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Encourage employees and contractors to report instances of non-compliance or concern and to protect whistle blowers, by way of a confidential and secure online reporting portal.

#### **SUPPLIER ADHERENCE TO OUR VALUES**

We have a robust approach to combatting slavery and human trafficking and we expect all those in our supply chains and contractors to comply with our values. To do this, we have in place a supply chain compliance programme. This consists of including general compliance provisions in supplier contracts where appropriate. We also require all suppliers to provide us with a copy of their Modern Slavery policy. However, there are cases where some organisations, typically small businesses, do not have one. In these instances, we provide a copy of our own Modern Slavery and Human Trafficking policy and require suppliers to sign an agreement that they will comply with it as if it was their own policy.

We have a dedicated compliance team, which consists of involvement from the Legal and Human Resources functions.

If any concerns or areas of non-compliance are highlighted anywhere in the business, these will be reported to the Board of Directors and/or the Compliance Officer.

#### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we sourced and delivered a professional training course to members of the senior management team, as well as senior operations directors and all members of staff who have regular contact with our supply chain partners as part of their role. This explained the key elements of human trafficking and modern slavery, as well as signs to look out for and how to deal with any suspected incidence of human trafficking and modern slavery. At the date of this statement, 76.6% of employees who were identified as needing to complete the training have completed the module, with a minimum pass rate of 80%.

Once the training module has been completed by these groups, the key messages will be cascaded to station managers by way of a briefing note or modified training module.

#### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We use the following key performance indicator (KPI) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of stringent new supplier take-on procedures by our Non-Fleet Procurement Team and individual business areas, including logging of all non-conformances.

Our records show that there have been no actual incidences (or suspicions of incidences) of human trafficking or modern slavery of which we became aware in our supply chains during the year ending 31 December 2022.

#### **AREAS FOR IMPROVEMENT**

In preparing this statement, we have identified areas which we feel could be improved across the business. These are as follows:

- We need to improve the completion rate of the human trafficking and modern slavery training module from 76.6%. We will therefore work to ensure that all employees who were identified as needing to complete the training will complete it as soon as possible.
- Once the human trafficking and modern slavery training module has been completed by the groups identified above, the key messages will be cascaded to station managers by way of a briefing note or modified training module.
- We need to ensure that where our suppliers and subcontractors do not have their own Modern Slavery policy, we provide a copy of our own Modern Slavery and Human Trafficking policy and require them to sign an agreement that they will comply with our policy as if it was their own.
- We will continue to log all instances of suspicions or actual incidences of human trafficking or modern slavery of which we become aware in our supply chains. This record will help us to spot patterns emerging and assist us in identifying any problem areas.

These actions will be implemented during the course of this year and will be completed by 31 December 2023. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2022. It will be published on the Group's website.

  
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**Ron Santiago**  
**Managing Director**  
**EUROPCAR GROUP UK LIMITED**

Date: 14/06/2023