



Auto Trader Group PLC

# Statement on Modern Slavery Act

# Auto Trader Group plc

## Statement on Modern Slavery Act

### Introduction

The **UK Modern Slavery Act** requires large commercial organisations operating in the UK to publish a slavery and human trafficking statement.

At **Auto Trader Group plc**, we seek to operate in an open and ethical manner in all our business dealings.

This statement is made on behalf of **Auto Trader Group plc**, **Auto Trader Limited** and **Autorama UK Limited** in accordance with **Section 54(1)** of the **Modern Slavery Act 2015** in relation to the financial year ended **31 March 2024**.

### Our policy on slavery and human trafficking

Auto Trader is committed to preventing slavery and human trafficking, forced or compulsory labour and child labour in its business and supply chains. We aim to uphold the highest standards of integrity and transparency in all our business dealings and relationships, and we have a zero -tolerance approach to the mistreatment of people in our employment or in any of our supply chains.

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# Responsibility

## Our business

Auto Trader's purpose is to 'Drive Change Together. Responsibly'. We aim to grow both our car buying and selling audiences, thereby strengthening our core advertising business. We will change how the UK shops for cars by providing the best online car buying experience and enabling all retailers to sell online. We aim to build stronger partnerships with our customers, use our voice and influence to drive more environmentally friendly vehicle choices, and create a diverse and inclusive culture.

## ESG statement

Our environmental, social and governance (ESG) strategy is underpinned by our purpose. We can play a positive role in making a difference to our people, our communities, our industries, and the wider environment to create a more accessible, equitable and sustainable future.

Working responsibly is central to our purpose and strategy. Our purpose is driven by our commitment to doing the right thing, measuring, and reporting transparently and always acting with integrity. We are committed to observing internationally recognised risks, such as climate change and modern slavery, and acting on these as part of our ESG strategy.

## Group Structure

Auto Trader Group plc is the group holding company, with subsidiary undertakings in the UK. Our business is operated through three trading subsidiary undertakings and a joint venture in the UK, as detailed in the [Annual Report and Accounts](#). Auto Trader listed on the London Stock Exchange in March 2015 and is a member of the FTSE 100 Index

## Our people

Our people are our most highly valued asset and are critical to Auto Trader's success and growth. We are focussed on ensuring our culture remains open and supportive of our employees.

Within Auto Trader, we have approximately 1,300 employees based in the UK. Auto Trader is an equal opportunities employer and committed to fair and equal treatment in recruitment and employment matters. We recruit in line with our policies and values and have processes in place to mitigate any risk for internal and external recruitment.

All recruits are verified for the right to work in the UK. Documentation is obtained and reviewed prior to the employee starting with Auto Trader to mitigate the risk of any human rights violations.

Auto Trader pays all recruitment costs and expenses on an 'employer pays principle' for the recruitment of all employees.

## Employees

We are confident that there is no risk of slavery or human trafficking in the employment or engagement of our own employees, but we remain vigilant.

We are opposed to all forms of discrimination with respect to employment and occupation, modern slavery, human trafficking, forced or compulsory labour and child labour, in our business and our supply chain. We are committed to supporting human rights through our compliance with national laws and through our internal policies which adhere to internationally recognised human rights principles. In line with our commitment to creating a diverse and inclusive culture, our internal policies require respect and equal and fair treatment of all persons we come into contact with.

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We safeguard our employees through a framework of policies and statements including Modern Slavery, Gender & Ethnicity Pay Gap Reporting, Flexible Working, Equal Opportunities, and Inclusion Policies.

Auto Trader Group plc became an accredited Real Living Wage employer in November 2021. As a Real Living Wage employer, we ensure that all our employees are paid no lower than the wage rates confirmed by the Real Living Wage Foundation (both in London and nationwide), which is based on the cost of living and is higher than the Government's National Minimum Wage. We have also taken the necessary steps to ensure and verify that all contractors with employees operating on our premises on a regular basis are paid the Real Living Wage or above.

## Our supply chains

Auto Trader is a digital services provider, and we are confident that there is a low risk of modern slavery in our business and supply chains.

We have identified the suppliers we believe could have a heightened risk of modern slavery, using geo location as well as category/commodity type and spend, and will continue to map the extent of our operations and supply chain.

From analysis of companies that we work with, that have the potential for increased risk, we have identified that 75% are UK based suppliers, 19% are USA based and 6% in Europe. We will continue to review and monitor these companies.

We believe our most salient modern slavery risks could occur via service companies and through manufacturers of commodities, such as IT equipment.

Auto Trader assesses all new suppliers who may represent a risk of modern slavery. We utilise structured questionnaires, monitor supplier relationships, and carry out periodic

checks related to the level of risk. Further information on our assessment process is included below.

We engage with suppliers who provide the following services:

- **Direct costs of sale:** domain name and email services and direct costs for various online products and services.
- **Technology costs:** information technology infrastructure, hardware providers, software suppliers, public cloud services; outsourced data centre services, data, taxonomy and data feeds.
- **Marketing costs:** digital advertising including social media, television media and advertising services, marketing and PR consultancy services and market research.
- **People costs:** recruitment and talent search services, training and development costs, staff travel, accommodation, and entertainment.
- **Overheads:** professional services, such as accountancy, audit and legal advice, banking and payment service providers, credit checking and collection costs, facilities management, office equipment, stationery supplies, cleaning, and catering services.



## We undertake the following steps to combat slavery and human trafficking:

### Risk assessment and management

- We risk assess our supplier relationships to assess the potential human rights impacts within our business and supply chain, considering the suppliers' geographical location and nature of services. This is a continual and ongoing process to ensure that we remain vigilant to changes in their businesses.
- The conclusion of our ongoing risk assessment is that there are minimal/low risks of the existence of modern slavery in our supply chain.
- Where there is a risk around a specific type of service then we adapt and enhance our processes and procedures when we engage that supplier.

### Due diligence processes

- Our zero-tolerance approach to modern slavery is communicated to key suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- Suppliers deemed high risk will be required to respond to a standard due diligence questionnaire that incorporates questions on modern slavery, their associated policies and procedures, and queries what action they take as a business to mitigate the risk of modern slavery in their business and within their supply chain. Where required, appropriate contractual clauses are included in the terms agreed between Auto Trader and its supplier.
- As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

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## Training for staff

- All members of our procurement team undertake additional ethics training via the Chartered Institute of Procurement and Supply which has more specific modern slavery principles relating to procurement and supply chain activities, this is undertaken once per annum.
- All staff have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in such a way that the opportunity and incidence of modern slavery is prevented.
- Employees are required to complete compliance training as part of their induction training and on an annual basis covering a range of compliance matters, including their obligations under the Modern Slavery Act. During the last financial year, ending March 2024 employees have completed training to improve their knowledge and awareness of modern slavery.
- Employees are also trained on the use of our whistleblowing policy; employees are encouraged to report any suspected activity that might lead to a breach of our policy in any parts of our business or supply chains of any supplier at the earliest possible stage.

Employees are required to complete compliance training as part of their induction and on an annual basis.



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## Measuring effectiveness

We will use key performance indicators (KPIs) to measure the effectiveness of our actions to identify concerns around modern slavery practices within any part of our organisation and supply chain, these include:

- Governance and Due Diligence, including any cases identified
- Procurement and Supply Chain
- Employee training and education

We will continue to review and develop our KPIs to align with our business and operations and assess the effectiveness of our actions.

### Contracts

As part of our ethical procurement process, we continue to monitor higher risk suppliers, via a due diligence questionnaire. The Auto Trader Supplier Code of Conduct is now fully implemented and has been shared with existing and new suppliers.

You can read our Ethical Procurement Policy and view our Supplier Code of Conduct [here](#).

### Reports

We monitor reports or concerns raised regarding modern slavery; this includes any concerns raised via our whistleblowing process. Our Whistleblowing policy is reviewed annually, and we provide employees with a clear process that allows them to raise concerns about business activities including slavery and human trafficking. There have been no such reports this year.

We are committed to carrying out all business activities in an honest and open manner and strive to apply high ethical standards in all our business dealings.

You can find further information regarding our commitments to working responsibly, including adherence to UN guiding principles of business human rights, in our [Annual Report](#).

Auto Trader has not identified any instances or suspected instances of modern slavery, including within its supply chain, this year.

If any instances were identified, we have a process in place that includes the following steps:

- Investigation
  - If any instances are identified we may take immediate action including issuing notice to stop work, breach of contract or termination of contract.
- Remediation to any victims.
- Plans to mitigate future harm.
- Escalation to senior stakeholders or appropriate authorities.
- Ongoing monitoring and periodic review.

### Industry collaboration

We actively participate in multi-stakeholder collaborations and industry initiatives including business networks on modern slavery to build relationships with other organisations to improve awareness of the risks of modern slavery. We have engaged with the CCLA to assess ourselves against their benchmarking and identify how we can make improvements and address the risks of modern slavery.

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## Future activity

We will continue to raise awareness for employees involved in engaging suppliers or conducting contract negotiations by:

- Maintaining our accreditation as a Living Wage employer.
- Raising awareness of modern slavery with our employees, including projects and initiatives to improve awareness and knowledge.
- Implementing a scorecard to monitor performance against agreed key indicators.
- Taking steps to develop information and communications about our policies and procedures, including adding our statements to the Government Slavery statement registry.
- We will be issuing a new supplier code of contact in 2024 to include a grievance mechanism for suppliers and employees of suppliers to report re modern slavery or human rights violations to AT or appropriate authorities.

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 March 2024**.

The statement will be added to **Government Modern Slavery Statement Registry**.

Approved by the Board on **19/09/2024** and signed on its behalf by

**Nathan Coe**

**Chief Executive Officer.**

**Auto Trader Group PLC**

**Auto Trader Limited**

**Autorama UK Limited**

