



# Auto Trader Group PLC Statement on Modern Slavery Act

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## Introduction

The **UK Modern Slavery Act** requires large commercial organisations operating in the UK to publish a slavery and human trafficking statement. This statement is made on behalf of **Auto Trader Group plc** and **Auto Trader Limited** in accordance with Section 54(1) of the **Modern Slavery Act 2015** in relation to the financial year ended 31 March 2022.

## Our policy on slavery and human trafficking

Auto Trader is committed to preventing slavery and human trafficking 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** exists 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.

**Auto Trader Group plc** is the group holding company, with subsidiary undertakings in the UK and Ireland. **Auto Trader** listed on the **London Stock Exchange** in March 2015 and is a member of the FTSE 100 Index with annual revenues of approximately £432.7m.

## Our people

Across the **Auto Trader Group**, we have approximately 1023 employees based in the UK and Ireland. **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.

## Living wage employer

In November 2021 **Auto Trader Group plc** became an accredited **Living Wage employer**. As a living wage employer, we ensure that all our employees are paid no lower than the living wage (both in London and nationwide), which is based on the cost of living and is higher than the Government's 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 living wage or above.

## Our supply chains

Due to the nature of our business, we assess that there is a low risk of modern slavery in our business and supply chains. 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 and data 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.

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## We are undertaking 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.
- 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 where we engage that supplier.

### Due Diligence Processes

- Our zero-tolerance approach to modern slavery is communicated to key suppliers, contractors, and business partners through our **Supplier Code of Conduct** 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 the 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.

### 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 obligation under the **Modern Slavery Act**. During the last financial year, ending March 2022, employees have completed training to improve their knowledge and awareness of modern slavery.
- Through our whistleblowing service, staff 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.

## Measuring effectiveness

### Industry collaboration

We actively participate in multi-stakeholder collaborations and industry initiatives including business networks on modern slavery to build relationships with other organisations and improve awareness of the risks of modern slavery.

### 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 of concerns raised regarding modern slavery; this includes any concerns raised via our whistleblowing process. We have received no reports this financial year.

### Future activity

- We will continue to raise awareness for employees involved in engaging suppliers or conducting contract negotiations.
- Raise awareness of modern slavery with our employees, including projects and initiatives to improve awareness and knowledge.
- Take steps to develop information and communications about our policies and procedures. 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 2022.

Approved by the Board on 15/09/22 and signed on its behalf by **Nathan Coe, Chief Executive Officer**.

Auto Trader Group PLC

Auto Trader Limited