



# 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 2021.

## 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 is the UK and Ireland's largest digital automotive marketplace and is a 100% digital business having successfully completed the transition from a print title in 2013. Our primary activity is to help vehicle retailers compete effectively on the marketplace in order to sell more vehicles, faster.

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. We have approximately 933 employees and annual revenues of approximately £262.8m, all generated from customers in the UK and Ireland.

We have three main revenue streams:

- **Trade:** revenue from retailers and home traders advertising their vehicles and utilising Auto Trader's products;
- **Consumer services:** revenue from private sellers who can place an advert for a fee on the marketplace and from our partners who provide services to consumers; and
- **Manufacturer and Agency:** revenue from manufacturers or their advertising agencies who advertise their brand or services on the marketplace. We also operate a similar business in Ireland through our website carzone.ie.

Auto Trader is an equal opportunities employer and committed to fair and equal treatment in recruitment and employment matters

### Our people

We have approximately 968 (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.

### 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 costs:** information technology infrastructure, hardware providers, software suppliers, public cloud services; outsourced data centre services and data feeds.
- **Marketing costs:** online, print and 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; and
- **Overheads:** accountants, audit and legal advisers, banking services, payment service providers, credit checks and collection costs, building maintenance, office equipment, stationery supplies, cleaning and catering services.





## 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 procedures.

### 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 and their associated policies and procedures. All suppliers are made aware of our zero tolerance of modern slavery and have been asked to confirm their compliance with the Modern Slavery Act 2015.
- 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

- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those
- 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 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
- 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.
- 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.

**91%** of Auto Trader employees have completed training to improve their knowledge and awareness of modern slavery

## Measuring effectiveness

We are starting to monitor the effectiveness of the measures we've introduced and will report progress in future statements.

## Employee training

During this financial year 91% of employees have completed training to improve their knowledge and awareness of modern slavery.

## Contracts

As part of our Ethical Procurement process we continue to monitor higher risk suppliers, via a due diligence questionnaire. We have created a new Auto Trader Supplier Code of Conduct which is being shared with our existing suppliers, as well as all new suppliers. We are also expanding the usage of an Ethical Procurement Questionnaire within our supply chain to understand what measures our higher risk suppliers have in place.

You can read the 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.
- Become an accredited Living Wage Employer- we will ensure that all employees are paid the living wage, including employees contracted to work on our premises.
- 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 Groups slavery and human trafficking statement for the financial year ending 31 March 2021.

Approved by the Board on 17/09/2021 and signed on its behalf by Nathan Coe Chief Executive Officer

Auto Trader Group PLC

Auto Trader Limited

