

## Working responsibly

# Ensuring we make a positive impact

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.

Our ESG strategy focuses on the material issues that have the greatest impact on our business whilst considering the expectations of our stakeholders. We also recognise that our activities, and the way in which we carry them out, impact well beyond our financial performance and so our ESG strategy considers the impact our decisions have more widely on the environment, our people and society. Our many ESG initiatives are focused on ensuring we do business responsibly and, as the UK's largest automotive platform, that we play our role in creating a more accessible, equitable and sustainable future. Our ESG strategy supports this purpose over the long term.

Our trusted brand has been built over more than 40 years and we remain committed to being the best place to find, buy and sell vehicles in the UK on a platform that enables data-driven digital retailing for our customers.

In a rapidly changing world, we know that we will only succeed as a business if we use our technology, expertise and data to help solve the challenges our customers, our consumers and our industries face. This involves ensuring platform resilience whilst remaining innovative and changing how the UK shops for vehicles by providing the best online buying experience and supporting all our retailers to do more of the sales process online.

During the year we have continued to ensure that ESG is embedded in our business strategy. We use our cultural KPIs (see page 24) to help us monitor and measure progress and this year, we also undertook a full refresh of our materiality assessment to consider what ESG issues matter most to our stakeholders and the impact of these on our business.



**Our ESG strategy is underpinned by our purpose, Driving Change Together. Responsibly.**

We can play a positive role in making a difference to our people, our communities, the industries we operate in and the wider environment to create a more accessible, equitable and sustainable future.



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# Working responsibly to drive sustainable ESG impact

This year, we made meaningful progress across our Environmental, Social and Governance ('ESG') priorities. From reducing our carbon footprint to advancing diversity and strengthening ethical governance, our actions reflect a deep commitment to responsible growth.

**ENVIRONMENTAL**

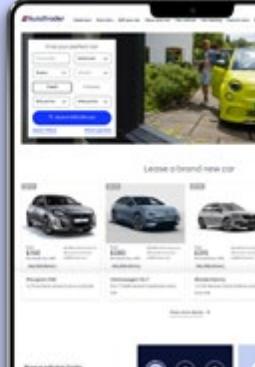


**1,434**  
tonnes carbon removals purchased

**SOCIAL**

Digital inclusion fund in partnership with Forever Manchester

Launch of our new volunteering platform 'Matchable'



[OUR PEOPLE & COMMUNITIES P51](#)

**GOVERNANCE**

**NIST**  
Cyber Security Framework

This framework helps us identify areas for improvement and set a target state, complementing our existing business and cyber security operations



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**ENVIRONMENTAL**

Digital and tech sector Carbon Literacy toolkit launched in collaboration with Manchester Digital and The Carbon Literacy Project

**Automotive sector impact**

**311**  
organisations trained

**5,800**  
people trained



[THE ENVIRONMENT P33](#)

**GOVERNANCE**

**GDPR**

Foundation training to achieve the International Board for IT Governance qualification



**SOCIAL**

**10 years**  
of our Make a Difference Guild



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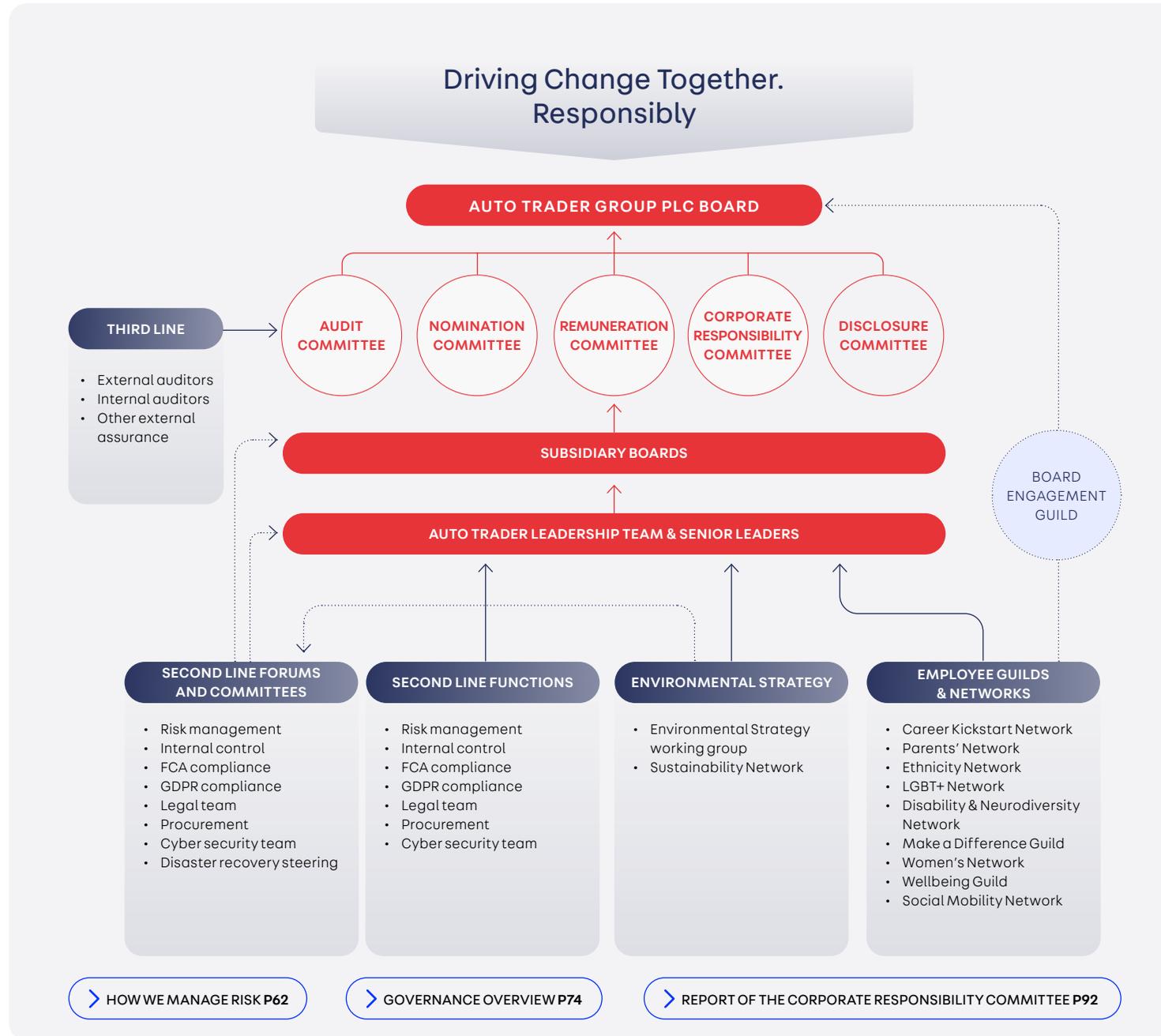
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# Governance of our ESG strategy

We have established our Corporate Responsibility Committee to sit alongside our Audit, Remuneration and Nomination Committees.

Whilst ESG-related topics are covered in all Committees, the Corporate Responsibility Committee is a formal Committee of the Board with the overarching goal of guiding and overseeing our corporate responsibility initiatives and sustainability targets. The Committee plays a crucial role in overseeing the progress towards fulfilling our ESG strategy and ensuring that our targets and goals remain ambitious and realistic. Responsibility for putting our ESG strategy into action spans across the business through specific functions and through our individual guilds and networks, which are empowered to drive change within the organisation.



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# Revising our materiality assessment

## MATERIALITY APPROACH TO ESG

In order to remain successful in the long term, an understanding of our most material ESG topics is essential to inform company strategy, targets and reporting. When we initially implemented our materiality assessment in 2022, we agreed to refresh it in full every three years, and therefore this year we undertook this exercise to ensure that the focus of our ESG strategy remains aligned to issues that our stakeholders deem most important. We have taken a financial materiality approach to our assessment, considering the factors which may generate risks or opportunities that have a significant influence on future cash flows.

We identified 19 ESG factors of material importance to our business and assessed each area, taking into consideration risks, opportunities and potential financial impact on the Group's cash flow before any mitigating actions. To help inform our assessment, we sought feedback from our stakeholder groups on which ESG factors they consider most important with regards to Auto Trader.

The assessment this year identified driving trust and transparency; digital infrastructure and cyber security; data privacy, ethics, integrity and business conduct; customer satisfaction; and compliance with legislation, regulation and codes of practice as matters considered to be of high importance to both our stakeholders and Auto Trader. In addition, diversity and inclusion; workplace culture and employee engagement; and health, safety and wellbeing were factors with higher importance to the Group.



## STEPS IN OUR MATERIALITY ASSESSMENT



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# The environment

Our Climate Transition Plan - a strategic roadmap to a sustainable future.

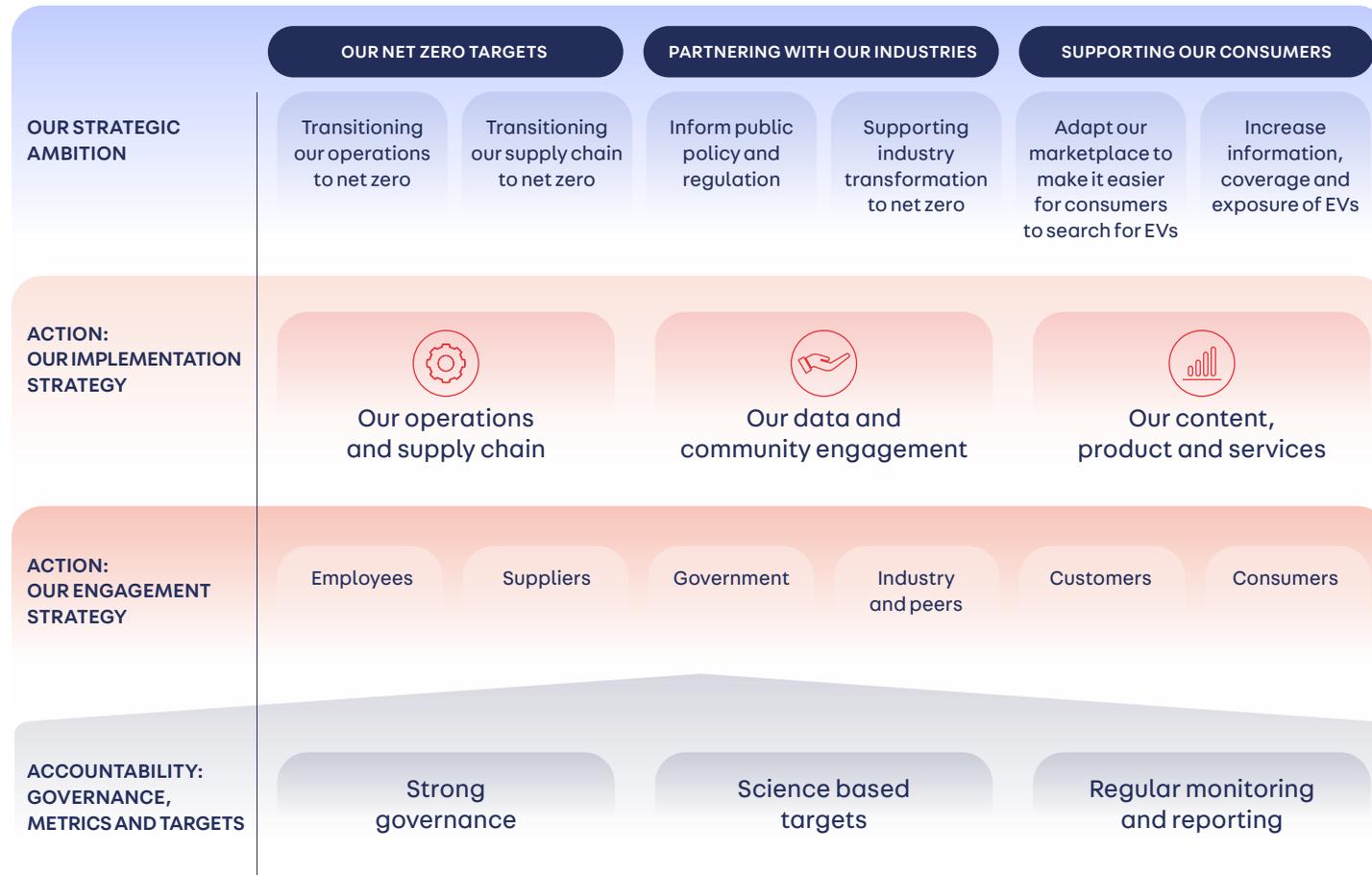
Developing a climate resilient strategy aligned to the UK's ambitious environmental targets and which aims to minimise future risks, capture opportunities and protect our business from the impact of climate change.

We are pleased to publish our first Climate Transition Plan ('CTP'). Its aim is to outline our role in the transition to a net zero economy. We will review our transition plan at least every three years in line with the TPT recommendations, and provide updates on our progress on an annual basis.

The UK has set itself ambitious targets to cut greenhouse gas ('GHG') emissions to net zero by 2050. As a responsible business Auto Trader has a role to play in reaching this goal. We are committed to reaching net zero in our own operations by 2040 - we recognise, however, that we have a small carbon footprint, so we

focus equally on areas outside of our emissions measure, including the industry and the cars listed on our platform. We can help drive change by using our capabilities and voice to contribute to an economy-wide transition, supporting the UK Government and the automotive and technology industries.

### OUR CLIMATE TRANSITION PLAN AT A GLANCE



SUPPORTING THE UN SDGS MOST RELEVANT TO OUR STRATEGY



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### Ambition

Our strategic ambition is to minimise our impact on the environment, thereby protecting our business from the impact of climate change.

#### TAKING A STRATEGIC AND ROUNDED APPROACH

Our strategy is 'Putting the brakes on carbon', not only across our own operations and supply chain, but also by using our capabilities and voice to influence the automotive and technology industries to support others in the transition to a low carbon economy.

As the world transitions to a low carbon economy, regulatory change and changes in consumer behaviour will have an impact on the automotive and technology

industries. We need to continue to develop and adapt our business strategy to incorporate climate resilience. Reducing the impact our business has on the environment is embedded into our wider business strategy of acting responsibly and we are committed to being a net zero business by 2040.

As well as reducing our own emissions, our strategy also focuses on raising environmental awareness with both our customers and consumers, encouraging them to reduce their own environmental

impact. We use our breadth of expertise, data and market insight to accelerate the transition to low carbon transport. Another key part is sharing our data and insights with Government to help inform public policy and regulation to support the mass adoption of electric vehicles.

Failure to deliver on our environmental commitments could negatively impact our brand as a responsible business or result in regulatory sanctions.

**By 2030**  
(from 2023 base year)

**50%**  
reduction in emissions we control (Scope 1 and Scope 2)

**46.2%**  
reduction in emissions we influence (Scope 3)

**By 2040**  
(from 2023 base year)

**90%**  
reduction in all emissions (Scope 1, Scope 2 & Scope 3)

## NET ZERO

As defined by the SBTi: Reduce emissions by at least 90% to reach net zero. Then, any remaining emissions (usually no greater than 10% of base year emissions) must be neutralised through carbon removals. Our 2040 targets to reduce all emissions by 90% have been fully validated by the SBTi.

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# Putting the brakes on carbon

Our strategic ambition is covered across three key focus areas, with robust governance underpinning them:



## Our operations

Our aim is to be net zero by 2040. We will do this by:

- Embedding a culture of sustainability to ensure all employees can contribute to our net zero goals through their roles.
- Minimising the environmental impact of our offices and company cars.
- Engaging with our suppliers and other stakeholders in our value chain to support them in the transition to a low carbon economy.
- Continuing to identify and respond to climate related risks and opportunities that arise from the transition to a low-GHG emissions, climate-resilient economy.



## Partnering with our industries and influencing the UK Government

Our aim is to influence the Government, and partner with and support the automotive and technology industries in their own transition towards a low carbon economy by:

- Using our breadth of expertise, data and market insight to accelerate the transition to low carbon transport.
- Sharing our data and insights with retailers, the broader automotive industry and Government to help inform public policy and regulation to support the mass adoption of electric vehicles.
- Collaborating with the automotive and technology industries to support their own sustainability journeys with our partner, The Carbon Literacy Project.



## Supporting consumers

Our aim is to support consumers to make more environmentally friendly vehicle choices which means we will focus on:

- Normalising sustainable choices through surfacing content and information on our site to grow consumer confidence around electric vehicles ('EVs').
- Developing reviews and YouTube videos that help to educate and inform car buyers about EVs.
- Promoting EVs as part of our wider marketing activity, including our monthly EV giveaway.
- Sharing 'The Facts' about owning and running an EV with consumers via owned and earned channels.

## Governance

We have integrated climate governance into our existing governance processes and sought to embed responsibility for the risks associated with climate change throughout our business, adopting a climate change focused mindset.

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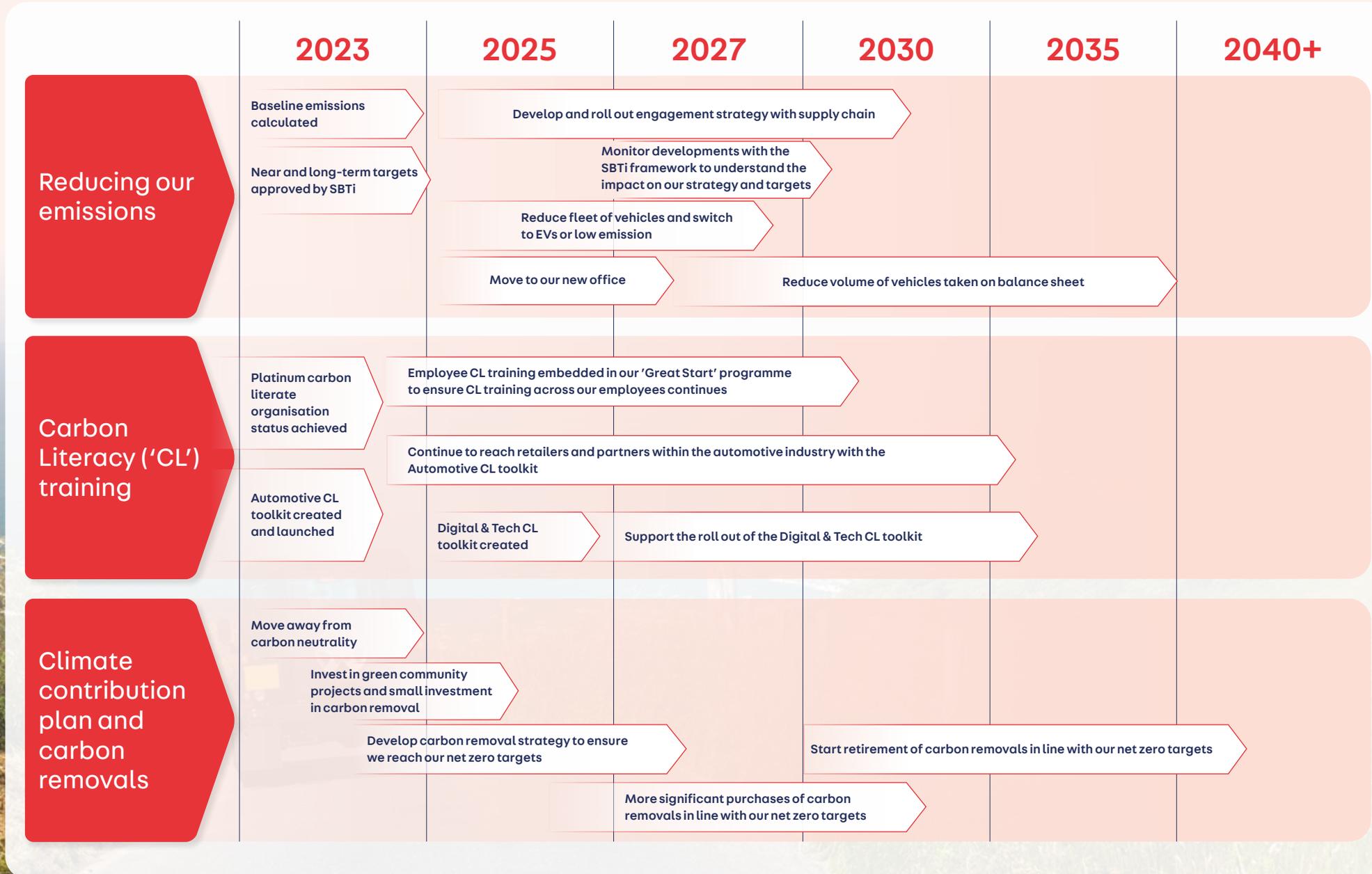
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**ADAPTING OUR MARKETPLACE**

As an online marketplace, our direct GHG emissions are low in comparison to other industries. However, the automotive industry holds a key role in tackling climate change and there is pressure from consumers and Government to reduce its impact on the environment. We can influence positive societal change through our content, and encourage positive climate action amongst our audiences.

Auto Trader is uniquely positioned to accelerate the transition towards a low-GHG emissions and climate resilient economy. The transition to a low-carbon economy requires us to evaluate our operations and also adapt our marketplace to meet the changing preferences of all car buyers. This means changing the way we work, how we support our customers and our consumers and how we partner with our wider industries. We have the opportunity to do this by positively supporting our customers and audiences through our marketplace, our content and by working with the automotive industry and Government bodies to shape the transition towards mass adoption of EVs.

See 'Our implementation strategy' and 'Our engagement strategy' sections for more detail on page 41 and page 45.

**CONSIDERING NATURE WITHIN OUR PLAN**

The Taskforce on Nature-related Financial Disclosures ('TNFD') has developed a set of disclosure recommendations and guidance that encourage and enable businesses to assess, report and act on their nature-related dependencies, impacts, risks and opportunities. Climate and nature are inherently connected and it is important that we seek to understand how nature-related risks could affect our operations and financial performance. We are at the very early stages of considering nature-related risks and a nature-positive strategy, with a view to reporting on these in the future in line with the recommendations from the TNFD.

**DEPENDENCIES**

Achieving our strategic ambition and reaching our net zero targets are both dependent on external factors. These have informed our implementation and engagement strategies and we will need to continually monitor these as we work towards achieving our goals.


**EXTERNAL FACTORS**

Broad external dependencies	Sector factors Industry trends	Value chain factors Suppliers and customers
<b>Government policy</b> UK Government policies, new decarbonisation reporting requirements and regulation put in place to govern the electric vehicle transition and the UK's net zero target.	<b>Technology &amp; innovation</b> Advancements in technology, including hardware and software, that will enable better outcomes.	<b>Data quality</b> Accurate data on operational and supplier emissions, as well as the ability to use this to report progress, and disclose externally.
<b>Global decarbonisation</b> Worldwide momentum towards net zero and the required structural changes which are impacted by a variety of factors, such as the impact of geo-politics on decarbonisation.	<b>Consumer behaviour</b> Consumer opinion on climate change and the effect this has on their perceptions of the electric vehicle transition.	<b>Supplier commitments</b> Suppliers committing to align with our net zero ambition by establishing their own reduction targets and transition plans.
<b>Global economy</b> How the global economy impacts our customers, our sector and our place in it and what this means for our ability to progress our decarbonisation goals.	<b>Industry collaboration</b> Industry-wide collaboration, including the sharing of best practice, supplier referrals and consistency of messaging both to internal (employees) and external (consumers) audiences.	<b>Customer behaviour</b> Our customers' attitudes to decarbonisation, going above and beyond the electric vehicle transition.

**RISK MANAGEMENT**

The Board is collectively responsible for determining the nature and extent of the principal risks which may impact the business. Our risk management framework, including the processes for identifying, assessing and managing risk, is described on pages 62 to 63 and the Board recognises climate change as one of Auto Trader's principal risks (see page 66).

Auto Trader plays an important role within the UK automotive ecosystem and climate change is a catalyst for unprecedented change within our industry. This mainly relates to the transition from ICE vehicles to Zero Emission Vehicles ('ZEVs') which could result in significant changes to automotive retail. We are working hard to support the industry with this transition, from providing content to help consumers 'demystify' EVs, to lobbying Government to incentivise the transition and sharing our data and insights to inform Government policy over EVs.

Internally, climate change also poses a threat to our business and to our supply chain, including via regulatory change. It is therefore critical that our risk management process considers climate change if we are to understand its impacts both on our business and on the automotive industry as a whole.

Our risk management process approach allows for the continual identification and assessment of climate related risks. We maintain an environment/climate risk register which is reviewed regularly by the risk register owner, their delegates and our risk management team. Each climate related risk is assigned an owner and controls and/or mitigating actions are recorded against each risk.

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**ASSESSING CLIMATE RELATED RISKS AND OPPORTUNITIES**

In order to protect our business from the challenges of climate change, we must build climate resilience into our business strategy by identifying climate related risks and opportunities.

As an online marketplace, we have a relatively small carbon footprint and our business model is sustainable in a low carbon environment. However, the automotive industry is intrinsically linked with climate change and there is pressure from consumers and Government for the industry to reduce its impact on the environment. The nature of the risks and opportunities that we face depends not just on the physical aspects of climate change, but also on transition risks.

These are driven by the trajectory of our customers and consumers in responding to climate change and the regulations applied to the market we operate in.

Our climate related assessment of the risks and opportunities posed by climate change and how they might impact our business has provided a firm foundation on which to build our environmental strategy and resilience. We considered the transitional and physical climate risks and opportunities presented by rising temperatures, climate related policy and emerging technologies. We agreed the methodology for assessing and quantifying financial impacts.

To ensure we understand the potential impact of plausible future states, in accordance with the TCFD recommendations, we have used climate scenarios to explore how potential climate risks and opportunities could evolve and impact our business over the short, medium and long term. In each case, the likely impact on costs or revenues was reviewed. We have assessed how the risks can be better managed, reduced or mitigated in line with the Group's risk management framework and business strategy. The risks identified during our analysis are more likely to present themselves in the medium or long term.

Having assessed and modelled the risks, we believe that there is no immediate material financial risk or threat to our business model. The results of our scenario analysis showed that based on our strategic plans and capabilities, we remain well positioned to mitigate the risks and seize the opportunities related to climate change. Even though there is uncertainty around the time horizon over which climate risks will materialise, stakeholder expectations and regulatory attention could develop at pace, impacting the rate at which the business may need to cut carbon emissions. We recognise that we will need to keep abreast of future climate change legislation as well as consumer preferences and retailers' ability to adapt. However, we have a strong track record of quickly evolving.

**KEY TRANSITION RISKS:**

**Regulatory changes:** Emissions regulations and Government policies favouring EV adoption may impact manufacturers' production strategies which will impact supply and therefore stock available to list on Auto Trader's platform.

**Supply chain disruptions:** Dependency on complex global supply chains exposes the industry to risks related to geo-political tensions, natural disasters, pandemics, tariffs and risks delaying new cars entering the UK, which can impact supply for retailers and therefore impact Auto Trader.

**Consumer preferences:** Changes in consumer preferences towards sustainable transportation options and shared mobility services could impact the desire to own a car outright, challenging the number of new and used car transactions made each year.

**KEY PHYSICAL RISKS:**

**Extreme weather and climate related natural disasters:** Extreme weather could impact our cloud providers which could impact platform performance. We could also see customers' ability to open their showrooms impacted, which risks their ability to sell vehicles.

**Resource scarcity:** Shortages of critical materials like rare earth metals and lithium could disrupt production of electric vehicles and their components, impacting supply of the vehicles into the UK and available stock on Auto Trader's platform.

**Geo-political instability:** Political unrest, trade tensions, tariffs and sanctions can disrupt international supply chains and increase production costs for automotive manufacturers, which risks the amount of vehicles they'll choose to sell in the UK and therefore impacts Auto Trader's new car stock offering.

Navigating these risks will require adaptation, innovation and strategic planning as well as robust risk management strategies and contingency planning.



CLIMATE SCENARIOS:		
Hot house world (>2°C)	Orderly transition (1.5°C)	
<ul style="list-style-type: none"> <li>Assumes business as usual, some climate policies are implemented but efforts are insufficient to halt significant global warming</li> <li>Continuation of current projection of carbon emissions with little or no abatement or mitigation</li> </ul>	<ul style="list-style-type: none"> <li>Assumes climate policies and legislation are introduced early to limit climate change and become gradually more stringent</li> <li>Both physical and transition risks are relatively subdued</li> </ul>	
IMPACT TIME HORIZONS, ALIGNED TO OUR BUSINESS PLANNING CYCLE:		
Short term 0-5 years	Medium term 5-10 years	Long term 10 years +

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# Climate related scenario analysis

Impact	Mitigation/response		Financial impact			Inherent likelihood
			Short term 0-5 years	Medium term 5-10 years	Long term 10+ years	
● Minor ● Moderate ● Major						
<b>PHYSICAL RISK – Increased frequency/severity of extreme weather and climate related natural disasters</b>						
<ul style="list-style-type: none"> <li>Offices closed</li> <li>Cloud infrastructure providers</li> <li>Customers cannot open their showrooms</li> </ul>	All technology infrastructure is cloud based. Disaster recovery/business continuity planning in place, including tools and guidance to support our people in emergency situations. COVID-19 proved the sales process can be completed without physical showrooms, plus development of digital retailing will enable all retailers to compete on our digital marketplace.	>2°C	●	●	●	Low
		1.5°C	●	●	●	
<ul style="list-style-type: none"> <li>Weather has the potential to disrupt the supply chain and limit vehicles entering the UK car parc</li> </ul>	We have experienced the impact of disrupted supply chains as a result of recent external catastrophic and geo-political events. These significant supply side challenges have constrained new and used car transactions for much of the past four years. However, our business has remained healthy as market dynamics have adjusted and OEMs and retailers learnt to adapt their business models. We would anticipate weather related disruption to be more intermittent and comparatively less severe than the disruption caused by recent events.	>2°C	●	●	●	Low
		1.5°C	●	●	●	
<ul style="list-style-type: none"> <li>Costs – increased operational costs such as heating/aircon, insurance, cloud costs</li> </ul>	In order to have a significant impact on our business, costs would need to increase significantly. We are continually reviewing our cost base such that any increases can be managed.	>2°C	●	●	●	Medium
		1.5°C	●	●	●	
<b>TRANSITION RISK – Increased regulation relating to climate change</b>						
<ul style="list-style-type: none"> <li>Existing UK regulation banning the sale of new internal combustion engine ('ICE') vehicles from 2035, with the industry already working towards this milestone</li> </ul>	We already closely monitor the implementation of policies related to our core business. We will continue to monitor policies with a view to identifying potential risks and opportunities and related financial impacts. We are already evolving our product offering and provision of information to support the effectiveness of EVs on our marketplace and will continue to meet changing preferences of car buyers.	>2°C	●	●	●	High
		1.5°C	●	●	●	
<ul style="list-style-type: none"> <li>Increased regulatory scrutiny and introduction of new legislation could result in increased reputational risk but also increased compliance costs. Failure to deliver against our environmental commitments would undermine our reputation as a responsible business and may result in loss of revenue, legal exposure or regulatory sanctions</li> </ul>	We have formed a Corporate Responsibility Committee to oversee our environmental strategy and commitments. We will report in line with the TCFD recommendations and report progress towards our net zero ambitions against our science based targets.	>2°C	●	●	●	Low
		1.5°C	●	●	●	

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Impact	Mitigation/response		Financial impact			Inherent likelihood
			Short term 0-5 years	Medium term 5-10 years	Long term 10+ years	
<b>TRANSITION RISK – Regulation discouraging the use of internal combustion engine ('ICE') vehicles</b>						
<ul style="list-style-type: none"> <li>Cost of ownership increases, making ICE vehicles less appealing</li> <li>Consumers stop buying petrol or diesel vehicles, demand switches over to electric</li> <li>If EVs remain expensive some consumers could be priced out of the market presenting a risk to demand</li> </ul>	We will continue with our strategy to adapt our marketplace to meet changing preferences of all car buyers. It is likely that used car prices will continue to move in line with supply and demand dynamics such that lower demand will make vehicles more affordable.	>2°C	Minor	Moderate	Major	Low/Medium
		1.5°C	Minor	Minor	Minor	
<b>TRANSITION RISK – Demand for sustainable products and services</b>						
<ul style="list-style-type: none"> <li>Consumers' preferences shift away from ICE vehicles; steep decline in purchase of petrol or diesel vehicles in favour of EVs</li> <li>Potential opportunity: Support our audience to find the sustainable options they are seeking</li> </ul>	We will continue with our strategy to adapt our marketplace to meet changing preferences of all car buyers and continue to be the largest marketplace for EVs.	>2°C	Minor	Minor	Minor	Low/Medium
		1.5°C	Minor	Minor	Minor	
<b>TRANSITION RISK – Increased reputational risk associated with the automotive industry and misrepresenting environmental claims</b>						
<ul style="list-style-type: none"> <li>As consumer consciousness around climate change rises, there is increased scrutiny on our industry's role on the environment</li> <li>Failure to appropriately demonstrate that as a business we are committed and moving towards net zero carbon emissions could negatively impact our brand and also impact our ability to operate and/or remain relevant to our customers and consumers</li> </ul>	As part of our goal to be net zero by 2040 we will focus on our own operational footprint and also on how we can positively support our industry. We have set clear reduction targets for our own operations and report progress to stakeholders. We work with customers, suppliers and the industry on education and policy.	>2°C	Minor	Minor	Major	Low
		1.5°C	Minor	Minor	Minor	
<b>TRANSITION RISK – Achieving resource efficiency through cutting our carbon footprint and improving energy efficiency</b>						
<ul style="list-style-type: none"> <li>Reduced costs associated with energy use and avoid increased costs associated with carbon taxation</li> </ul>	Reduction initiatives to reduce our absolute usage, including successfully moving our technology infrastructure to the cloud.	>2°C	Minor	Minor	Minor	Medium
		1.5°C	Minor	Minor	Minor	
<b>TRANSITION RISK – Increased reputational risk associated with the automotive industry and misrepresenting environmental claims</b>						
<ul style="list-style-type: none"> <li>Consumers may stop buying vehicles if they no longer require one</li> <li>Potential opportunity: Consumers' desire/need to switch to EV</li> </ul>	Likely the risk and opportunity would be taken together, and stock/demand would be maintained as the desire for personal transportation/vehicle ownership remains strong. We will continue with our strategy to adapt our marketplace to meet changing preferences for all car buyers and continue to be the largest marketplace for EVs.	>2°C	Minor	Minor	Minor	Low/Medium
		1.5°C	Minor	Minor	Minor	

**OUR FUTURE FOCUS**

We intend to periodically review the scenarios and timeframes we choose to apply in our analysis and refine them as needed. The risk management recommendations arising from our climate change scenario analysis were:

- Policy/regulation: It is likely that increased policy and regulation will have the most significant financial impact on Auto Trader over the longer term. The most significant action we can take is to reduce our exposure to this risk and continue with our strategy to adapt our marketplace to meet the changing preferences of all car buyers. We also need to make sure we continue to remain abreast of regulatory requirements to ensure we are compliant with all relevant reporting obligations.

- Market: Driven by its net zero ambitions, the Government announced the ban on the sale of new petrol and diesel vehicles by 2035, and this is already changing the make up of the car parc as consumers begin to buy electric vehicles as an alternative.

Auto Trader can mitigate this risk by continuing to develop its strategy to be the destination of choice for consumers searching for a more environmentally friendly vehicle.

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## Action: Our implementation strategy

We are taking action in our business operations, portfolio of services and policies to achieve our strategic ambition. Our aim is to embed a culture of sustainability across the business.



### SUSTAINABILITY NETWORK AND DIGITAL SUSTAINABILITY WORKING GROUP

Our Sustainability Network comprises passionate individuals from across the business who are focused on making life at Auto Trader more sustainable through increased employee awareness and driving impactful changes for our business.

More recently, our Digital Sustainability working group ('DSWG') has been formed. The aim of the DSWG is to focus on raising internal awareness of digital sustainability and provide reliable resources for employees to learn more about digital sustainability. This will encourage and enable employees to identify how we can adopt a more digitally sustainable approach to our products. A key aim for the DSWG is to embed sustainability across the various technology disciplines within Auto Trader such as design, marketing and development, with the goal of understanding what each team creates, the tools and processes they use, and identify opportunities to embed and advocate for sustainable solutions in these areas.

### MORE SUSTAINABLE DATA MANAGEMENT PRACTICES

In 2024 we finalised the migration of our data centres to the cloud which should result in less energy consumed to store our data compared to physical data centres. However, this move to the cloud also needs to be complemented with how much data we are storing. We are implementing specific initiatives across our business that focus on storage and data retention. This includes understanding how much storage we use across all of our tools and reviewing our data retention policies. Evaluating how we manage, store and dispose of data will contribute towards minimising our environmental impact. We are implementing and automating data retention policies to minimise storage capacity and we are also raising employee awareness of how digital waste contributes to our environmental impact.

### PRODUCTS AND SERVICES

Although our direct impact on global GHG emissions is low, through our reach we are in a unique position to make a positive difference to our customers and users of our marketplace.

The market for electric vehicles ('EVs') continues to grow; supply and demand for electric cars has grown materially over the last 12 months and it's important that our experiences evolve to meet this growing need. One step we have taken towards making electric cars easier to find on Auto Trader is to elevate the filters specific to EVs; where previously they were only shown if 'fuel type: electric' was selected, they are now shown by default. This makes it easier to find an EV with a suitable range. Alongside this change, we have introduced explainer copy within the EV filters, acknowledging that a number of buyers will be transitioning from traditional petrol/diesel vehicles to EV and will need more context and confidence to make the right decision for them.

As the market for EVs continues to grow, in order to meet the changing preferences of car buyers we must continue to evolve our product offering and provision of information to support the effectiveness of EVs on our marketplace and meet the needs of car buyers.

Dark Mode for our Auto Trader app was successfully rolled out in August 2024. This feature, now used by nearly half of our app users (either through system defaults or manual selection) consumes less energy and has received positive user feedback. As part of our design system evolution, we are implementing a comprehensive tokenisation of the Auto Trader colour palette, including Dark Mode colours.

Auto Trader is proud to be certified under the IAB Gold Standard. This shows our commitment to promoting sustainability by reducing carbon emissions from ad loads on our pages.

We strictly adhere to a creative acceptance policy for all media advertisers to ensure ad loads are kept to a minimum across all platforms and this is constantly reviewed. Furthermore, we have ceased carrying programmatic advertising from third parties to ensure that page loads remain minimal and on-site user experience is positive.

We are exploring ways to measure the carbon footprint of our on-site media advertising and are actively engaged in discussions with the IAB and ISBA to determine how best to achieve this.

See 'Our engagement strategy' section for more details on how we have evolved our content to support the transition to EVs (page 45).

The market for electric cars continues to grow with 50% more EVs advertised than this time last year and our experience needs to evolve to reflect this.



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**SCOPE 1 AND SCOPE 2 EMISSIONS**

A key part of our environmental strategy has always been to reduce the emissions directly generated from our operations and facilities.

Over recent years we have been decreasing our Scope 1 and Scope 2 emissions through various actions as set out in the table opposite and we continue with targeted action to further reduce our direct emissions.

**OUR POLICIES**

Our policies provide a framework to guide employees, suppliers and other stakeholders in improving our environmental performance and reaching our climate ambitions:

- Environmental Policy – Reflects our commitment to protect the environment and support the low-carbon transition.
- Ethical Procurement Policy – We want to engage suppliers that share our values to build a stronger and more responsible supply chain.
- Supplier Code of Conduct – Sets out our expectations of all our suppliers.
- Travel Policy – Sets out requirements for our employees to travel more sustainably.

Metric	Scope	Implemented or planned activities	Timeline
Switch 100% of our fleet vehicles (Auto Trader and Autorama) to be EV or low emission	SCOPE 1	<ul style="list-style-type: none"> <li>• 12 remaining vehicles, all of which are fully electric or hybrid.</li> <li>• We have a salary sacrifice scheme for employees available to those who need to drive as part of their role, providing EVs as a sustainability benefit.</li> </ul>	 IMPLEMENTED
Energy: reduce overall electricity/gas usage by 50% (against a 2023 baseline) and procure 100% renewable energy for our remaining needs	SCOPE 1	<ul style="list-style-type: none"> <li>• All of our offices are on renewable energy tariffs.</li> </ul>	 IMPLEMENTED
	SCOPE 2	<ul style="list-style-type: none"> <li>• In all our offices, lighting has been upgraded to LED light bulbs and sensors installed so that lighting is activated by movement.</li> </ul>	 IMPLEMENTED
		<ul style="list-style-type: none"> <li>• We have started to roll out standardising to new Apple products, which has allowed us to take a more holistic approach to reducing the carbon lifecycle of our employee focused technology. The products themselves have a substantially lower lifetime carbon footprint and are also much more efficient from a power usage perspective which means less charging. We are also able to reduce the amount of underlying tech infrastructure which is required when having both PCs and Apple products.</li> </ul>	 IN PROGRESS
		<ul style="list-style-type: none"> <li>• Hemel Hempstead office – This year we completed a large solar panel installation in September, replacing a smaller number of older panels. Rather than disposing of these, they were donated to a charity via our installer (Solarsense), and we made a further donation towards the recycling and reinstallation at Draycott Memorial Hall.</li> </ul>	 IMPLEMENTED
		<ul style="list-style-type: none"> <li>• Further enhancements to the Hemel Hempstead office have been identified as part of our ESOS Phase 3 action plan:                             <ul style="list-style-type: none"> <li>- install pipe and valve insulation.</li> <li>- lighting upgrade.</li> </ul> </li> </ul>	 PLANNED
		<ul style="list-style-type: none"> <li>• London office – we reduced floorspace at our London office.</li> </ul>	 IMPLEMENTED
		<ul style="list-style-type: none"> <li>• In 2026 we will be relocating our head office to state-of-the-art facilities in the heart of Manchester's tech community. Auto Trader is passionate about being a responsible technology business. The move to No.3 Circle Square will help Auto Trader in meeting our net zero goals as sustainability is one of the core principles in its design. The building will be net zero embodied carbon in both its construction and shared spaces, and is expected to achieve BREEAM Excellent status, as well as a NABERS 5-star rating and an EPC A rating.</li> <li>• As part of the move to our new office, we will plan to re-use existing furniture where possible as opposed to buying new and will work with existing partners to donate or recycle items we will not take with us.</li> </ul>	 IN PROGRESS
Migrating our data centres to the cloud	SCOPE 2	<ul style="list-style-type: none"> <li>• 100% of our data centres have been migrated to cloud providers.</li> </ul>	 IMPLEMENTED
Review of our data retention policies	SCOPE 2	<ul style="list-style-type: none"> <li>• We have been reviewing how we store data in each of our productivity suite solutions (including Office 365, Slack) and implementing changes which will help us save on storage, energy and productivity.</li> </ul>	 IN PROGRESS

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**SCOPE 3 EMISSIONS**

One of our strategic objectives is to transition our value chain to net zero emissions, bringing suppliers on the journey and embedding sustainability within our procurement processes. We calculate all relevant Scope 3 emissions, including those relating to suppliers. We are improving our data quality, using activity data where possible (as opposed to spend data), and will continue to get enhanced data as we continue to measure our emissions.

We are taking action to address our Scope 3 emissions. With the majority of our total greenhouse gas emissions attributed to spend within our supply chain in our baseline year, engagement with our value chain is crucial to achieving our carbon reduction goals.

The key actions that we are taking, or plan to take, within our value chain to achieve our Scope 3 targets are outlined opposite:

Metric	Scope	Implemented or planned activities	Timeline
Gathering supplier data and adapting procurement processes	SCOPE 3.1	<ul style="list-style-type: none"> <li>We have implemented a new supplier engagement strategy to collate information from suppliers which provides greater insight into aspects of their performance, including ESG practices. Ethical procurement questionnaires covering c.75% of our supplier spend have been completed.</li> <li>We will develop a clear plan for enhancing supply chain emissions data further to improve our Scope 3 emissions calculations relating to purchased goods and services.</li> <li>Develop guidance for supplier selection criteria specifically relating to climate.</li> </ul>	<b>IMPLEMENTED</b> <b>IN PROGRESS</b> <b>PLANNED</b>
Engaging suppliers	SCOPE 3.1	<ul style="list-style-type: none"> <li>We have expanded our discussions on sustainability with the suppliers who account for our highest carbon emissions, to understand where our suppliers are on their own sustainability journeys, recording if they are monitoring and reporting emissions and what scopes are included in a supplier's own reporting.</li> <li>Develop a plan for sharing knowledge and learnings with suppliers that are seeking to improve their environmental maturity.</li> </ul>	<b>IMPLEMENTED</b> <b>PLANNED</b>
Sustainable capex	SCOPE 3.2	<ul style="list-style-type: none"> <li>Refurbishment of our offices - where possible, we recycle furniture and/or donate unwanted furniture to local communities/organisations. This same policy will apply when we relocate to our new offices.</li> <li>Standardising to new Apple products including specifically the Mac Air range has allowed us to take a more holistic approach to reducing the carbon lifecycle of our employee focused PCs we have purchased in the past and are also much more efficient from a power usage perspective which means less charging.</li> </ul>	<b>IMPLEMENTED</b> <b>IN PROGRESS</b>
Business travel	SCOPE 3.6	<ul style="list-style-type: none"> <li>Our Travel Policy has been updated to make flights as a mode of travel by exception.</li> <li>Employees with a company car allowance are required to have an EV/low emission (75g/km or less for a hybrid) vehicle.</li> <li>Salary sacrifice scheme introduced for employees to lease an EV or low emission hybrid vehicle in a tax efficient way.</li> <li>Our travel booking system has been updated to display carbon emissions associated with bookings to make employees more aware of the impact their journeys are having.</li> <li>We have invested in video conferencing equipment in our offices to facilitate enhanced virtual meetings and collaborative online working.</li> </ul>	<b>IMPLEMENTED</b>
Purchased vehicles	SCOPE 3.1, SCOPE 3.10, SCOPE 3.11	<ul style="list-style-type: none"> <li>Develop a clear plan for reducing the volume of vehicles taken on balance sheet through Autorama.</li> </ul>	<b>IN PROGRESS</b>

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**PURCHASED VEHICLES – LEASING**

A significant part of the Group's Scope 3 emissions relate to the purchased vehicles that temporarily pass through Autorama's balance sheet. This significantly impacts our emissions from purchased goods and services and use of sold goods as we account for purchase of the vehicles as well as the lifetime emissions and end of life emissions of the vehicles. As the supply of new vehicles improves, we expect to become less reliant on vehicles where we are required to take them on balance sheet.

**PURCHASED GOODS AND SERVICES**

We want our supply chain to align with Auto Trader's own net zero goals, and are embedding this in our sourcing, supply chain management and reporting processes. We engage our suppliers to understand their own intentions, approaches, targets and actions with a view to measure, monitor and offer support and potentially future assistance to our key suppliers.

To complement our actions across our business operations, we have set a target of reducing our absolute Scope 3 GHG emissions by 46.2% before 2030 (from a 2023 base year), a key part of which will mean addressing our supply chain emissions to ensure that our purchased goods and services are aligned to the low carbon economy transition.

We set out a clear stance on the importance of appropriate environmental action with our highest emitting suppliers. All our suppliers' emissions are tracked as part of our own calculations, and we monitor this year-on-year. We also assess our top spend and highest emitting suppliers to see what they include and how they calculate their emissions, if they

have set any targets (SBTi or other), whether they submit a report to CDP (if so, how have they scored year-on-year) and finally, what are they sharing publicly, targets, initiatives, actions and do they feel appropriate for their business type, size and industry. This information forms part of an internal rating system which indicates where a supplier is on their journey to become a more sustainable business and aids internal business decisions about the relationships we have.

**FINANCIAL PLANNING**

We know our transition plan requires adequate financing to succeed. While we haven't quantified its impact on our financial position yet, we expect it to involve minimal investment and in some instances will yield cost savings. For example, reusing furniture from offices which would otherwise go to waste will save costs. The purchase of carbon removals will play a role in our ability to reach net zero and therefore developing a carbon credit purchasing strategy is required for us to meet our targets.

Our Revolving Credit Facility arrangements are linked to performance against our ESG targets, including our climate targets, ensuring that there is a direct positive financial reward for staying on track with our GHG emissions reductions through reduced rates. Investors consider ESG factors in their decisions, and our strong performance on various indices reflects our progress in ESG strategy.

**CARBON REMOVALS**

The purchase of carbon removals plays a role in our ability to reach net zero. We are developing a carbon credit purchasing strategy to align our purchase of carbon removals with our targets to meet net zero. In the meantime, we have started to build a modest portfolio of carbon removals.

Provider	Category	Tonnes CO <sub>2</sub> e
Ruumi Project	Sustainable Land Management	39
Highland Carbon's Loch Ness Project	Reforestation	324
The Carbon Removers / Carbon Capture Scotland	Carbon Capture and Utilisation	156
Undo	Enhanced Rock Weathering	615
The Carbon Removers / Carbon Capture Scotland	Carbon Capture and Utilisation	300

One organisation we have purchased removals from is UNDO, a project based in Scotland that uses enhanced rock weathering ('ERW') to capture and lock away CO<sub>2</sub> permanently from the atmosphere.

The project uses the ICROA-endorsed Puro Standard methodology to quantify high-quality, high-durability CO<sub>2</sub> Removal Certificates (CORCs). ICROA is the voluntary carbon market's provider of best practice guidelines.

ERW is a scalable technology with significant co-benefits to soil health and crop yields. It accelerates the natural geological process of weathering, whereby the CO<sub>2</sub> in rainwater interacts with silicate rocks such as basalt, forming bicarbonate ions which are transported to the ocean where it is stable over geological time. As this mineral-rich volcanic rock breaks down, it releases magnesium, calcium, potassium, phosphorus and other nutrients, increasing crop yield, raising and stabilising soil pH and ultimately reducing the need for fertilisers.

UNDO is currently establishing a range of operational partnerships that will enable the spreading of millions of tonnes of basalt each year. Its immediate aim is to spread enough rock by 2025 to remove one million tonnes of CO<sub>2</sub>, a first step towards billion-tonne scale operations.



# 46.2%

target reduction in our absolute Scope 3 GHG emissions

➤ ENGAGEMENT STRATEGY P45

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## Action: Our engagement strategy

An effective engagement strategy is essential to achieving the strategic objectives of our transition plan. We aim to influence industry change and support the net zero transition across all stakeholders we interact with.



### CARBON LITERACY

We embarked on our Carbon Literacy training for all our employees in 2019, working with the Carbon Literacy Trust with the aim of increasing the carbon literacy of all our employees, providing learners with an awareness of the carbon dioxide costs and impacts of everyday activities and the ability and motivation to reduce emissions, on an individual, community and organisational basis. Over 70% of our workforce trained and we are a platinum Carbon Literate Organisation – the first FTSE 100 company to achieve this accreditation. The training has been key in engaging our employees and raising awareness of climate change across the business, contributing to better decision-making around commuting, business travel, consumption of energy, and more broadly into operational decisions such as supply chain considerations and development of our products and services.

### EXTENDING CARBON LITERACY

- **Automotive Toolkit** – In 2022, we funded and launched the new Automotive Carbon Literacy Toolkit, developed in partnership with the Carbon Literacy Trust. The Toolkit contains pre-accredited training materials for organisations and staff working in the automotive sector, and has been specifically designed to engage the workforce through providing information directly related to the industry, and encouraging staff to reduce emissions within their role.
- **Digital & Tech Toolkit** – In 2025, we collaborated with the Carbon Literacy Trust and Manchester Digital to create a Carbon Literacy Toolkit for the Digital & Tech industry. The Toolkit was carefully designed to address the unique environmental challenges facing the technology industry, which in 2022 alone accounted for 62 billion kg of e-waste globally.

### ENGAGEMENT WITH OUR SUPPLY CHAIN

Working with our GHG emissions calculation partner, we have a granular level view of our highest emitting suppliers. We have engaged a combination of our highest emitting and highest spend suppliers, equating to c.75% of our financial year spend. We have three main approaches to supplier engagement:

**Code of Conduct (Supplier)** – Our published policy outlines Auto Trader’s approach and position on environmental, governance, ethical practices and social responsibility, setting out our expectations relating to sustainability and what we encourage all of our suppliers to consider. This is shared with our existing supply chain and all new suppliers we onboard.

**Know Your Supplier** – Auto Trader’s ethical procurement questionnaire helps us establish alignment to Auto Trader’s values, targets and actions. We gather information through a combination of discussion, questionnaire completion and self-service from publicly disclosed information, covering a variety of themes including community support, diversity and inclusion, governance, modern slavery and environmental action.

**Supplier Sustainability Ratings** – Working with our GHG emissions calculation partner, we are able to identify signals that a supplier is taking appropriate environmental action and assess whether they are leaders in sustainability action or only just starting their journeys. These are important indicators which complement the emissions we calculate and allow our decision-makers within the business to see what percentage of our overall emissions an individual supplier equates to, and assess if the supplier is taking appropriate actions to reduce their (and our) emissions over time. Ownership of GHG emissions at a relationship manager level is an important objective for Auto Trader to engage the business and drive emissions reduction at all levels within the business.

### FUTURE PLANS

As we move towards 2030, we intend to develop and improve our measurement and monitoring by taking the following actions:

- Engage with suppliers in a more managed way via a technology partner, potentially our GHG emissions calculation partner (Watershed) to gather more appropriate and contextual information from different types of businesses at different points in their environmental action journeys.
- Enhance the information gathering process by working with a market-leading due diligence partner which will automate and improve the quality of information we gather, so that we can focus our resource on proactive engagement and discussions with our suppliers.
- Develop and evolve our internal policies, processes and tools to adapt to our growing requirements to work with sustainable suppliers, whilst also refreshing and improving our external approach and documentation to ensure the importance to Auto Trader of appropriate environmental action is made clear to existing and new suppliers.



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**ENGAGEMENT WITH THE AUTOMOTIVE INDUSTRY****Supporting the industry in the electric transition**

The Zero Emission Vehicle mandate came into force in 2024, causing significant levels of change in the automotive industry for manufacturers and retailers as the mandate began to dictate the portion of electric vehicles ('EVs') that brands need to sell each year or risk paying fines. A lot needs to happen in the coming years to ensure the successful mass adoption of electric vehicles. Our wealth of data and insight gives us a unique view of consumer car buying intentions, and particularly consumer EV buying intentions.

We disseminate this data through various channels, including webinars, Electric Retailing Masterclasses, and the Retailer EV Insight Hub. Our strategy segments industry partners for a tailored experience depending on confidence, exposure and appetite for change. We support independent retailers, who have no one to provide additional training on these new products, through unique events offering data, insights, expert advice, as well as test drive opportunities.

Before switching to EVs, consumers need accurate information. However, myths and misinformation have influenced their views.

To counter this, we, along with the Society of Motor Manufacturers and Traders and Charge UK, have launched an initiative endorsed by the Department for Transport. 'The Facts' provide accurate data on the price, running costs, eco-credentials, fire risks, and charging of EVs, aiming to build consumer confidence.

Our goal is to ensure a fair and equitable transition to EVs. To aid this, we researched the EV gender gap and created the report 'No Driver Left Behind: Women and the journey to electric'. This has been well-received and featured on national TV, radio and online media and has been shared throughout the industry. Multiple Government departments and manufacturers have requested sessions on this topic.

**Sustainability**

The automotive industry is under enormous pressure to reduce its carbon emissions and whilst many of our industry partners have clear and bold plans to reduce emissions, many are still very early on in their sustainability journeys and require support to help them develop a carbon reduction plan. Through our partnership with the Carbon Literacy Trust, we have created and funded the Automotive Carbon Literacy Toolkit which has gone from strength to strength. We have now also launched a Digital & Tech Toolkit with a new set of sector partners.

In the automotive space, 311 organisations have now completed the training, which our customers view as an important step in their sustainability journey, as well as a key employee engagement initiative. Once an individual in a business has been accredited as 'carbon literate', the business is then provided with training content and trainer manuals that enable them to run their own one-day Carbon Literacy training. Over 5,000 automotive professionals have now achieved carbon literacy through the toolkit to help sustainability efforts (2024: over 1,000).

In addition to the training, we continue our Building a Sustainable Automotive Industry event series which aims to inspire action and motivate businesses to be more sustainable by gathering industry partners and sustainability experts together. This includes an online knowledge hub and LinkedIn community where industry peers can share questions, challenges and successes. We also award sustainability categories at our Retailer and Manufacturer Awards to encourage and champion those working on sustainability in their businesses.

**ENGAGEMENT WITH GOVERNMENT**

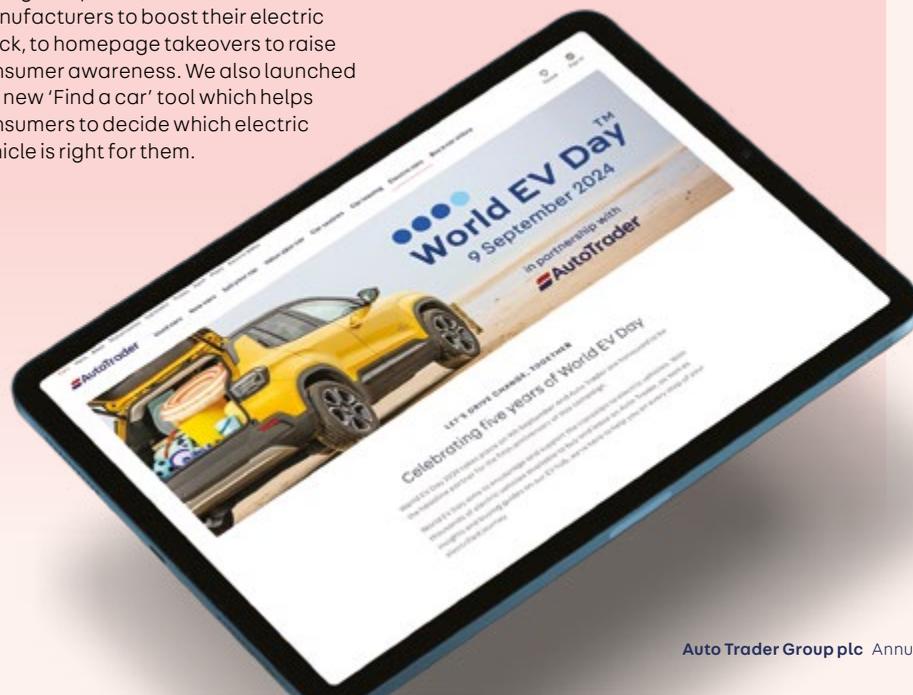
We have been regularly engaging with various Government departments to share our data and insights to help guide policy for several years. The number of Government departments receiving these insights has expanded, showing the value and impact of our work. Additionally, we have been invited to present oral and written evidence at the House of Lords Environment and Climate Change Committee Electric Vehicles inquiry, with our research playing a key part in the summary document of the inquiry.

We are members of the Society of Motor Manufacturers and Traders ('SMMT'), British Vehicle Remarking and Leasing Association ('BVRLA') and partner with ChargeUK, all industry bodies representing different aspects of the automotive sector. These memberships are valuable as they provide additional routes to influence key stakeholders and share our data and insight.

We also host and sponsor Parliamentary events including roundtables and receptions with Ministers, sharing key insights and data tracking the electric transition to inform their policy making. This is a key component of our public affairs work as well as individual meetings with Ministers and Department officials.

This data also forms the basis of our award winning 'Road to 2030' Reports, which are extremely valuable to not only the Government, but also to media and the industries involved in the electric transition.

We are headline sponsors of World EV Day and to mark the occasion this year we ran a number of workstreams, from gifting free products to retailers and manufacturers to boost their electric stock, to homepage takeovers to raise consumer awareness. We also launched our new 'Find a car' tool which helps consumers to decide which electric vehicle is right for them.



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**ENGAGEMENT WITH COMMUNITIES AND SOCIETY**

We aim to be a guiding hand through the EV transition and to help consumers understand how they can make more environmentally friendly choices. Through our consumer EV hub, we provide buying guides, informative content and explainers for those curious about electric cars. The consumer marketing team is focused on increasing traffic to this hub through various paid marketing activities. Our electric car review content from both the editorial and YouTube teams also plays a vital role in educating and engaging drivers about EVs. Our EV monthly giveaway has been running for three years now, garnering over 15 million entries since the beginning of the campaign. The EV giveaway is an incredibly successful campaign which increases awareness of electric vehicles. The Facts myth busting material will also be promoted across all channels to raise awareness of the key information consumers need.

A significant development in our mission to support environmentally-friendly choices was the launch of new electric bikes on our platform. The electric bike community welcomed this as a sign of market maturity, excited by Auto Trader's influence. On-site interest in e-bikes has surged, with successful Black Friday promotions and editorial content. We have also run multiple campaigns with influencers to grow the reach and engagement of electric bikes on Auto Trader; these partnerships allow us to reach younger and more diverse audiences due to the hand-picked nature of the influencers we work with.

Our No Driver Left Behind report uncovered that women were keen to learn more about electric vehicles in the content they already consume and so we have targeted the lifestyle media – educating them about the need for electric vehicle content and engaging them with the new technology in a way that will resonate with their readers. Following multiple relationship building activities, we are seeing strong results with repeated coverage in key lifestyle titles.

We have partnered with Community Computers, who work to address digital exclusion in Greater Manchester, to donate used devices to their service users. By repurposing salvageable technology instead of selling it back to suppliers, these devices can have a second life and help the digitally excluded, aligning with our community values and net zero strategy.

The partnership also means that technical waste is not going to landfills.

We have also partnered with the Manchester Green Spaces Fund to join regional efforts of nature recovery projects driven by local people right across Greater Manchester. We've given £96,000 to the Green Spaces Fund (FY24) to expand an ongoing partnership with the Greater Manchester Environmental Fund. These projects include a community garden, a pond on a community allotment, native tree and hedge planting and a new wildlife corridor.

**£96,000**

donated to the Green Spaces Fund



In 2023 we joined The Castlefield Viaduct Club, supporting the National Trust renovation work of the previously unused railway track, which is just a short walk from our Manchester campus. The aim is for the viaduct to become a 'garden in the sky' and a freely accessible green space. Through funding provided by the National Trust's relationship with Auto Trader, the garden was expanded to include a pond, planters for trees, a mural and more growing space.

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## Accountability

Governance, metrics and targets: enabling delivery through robust governance and reporting.

### OUR ROADMAP TO NET ZERO

Net zero refers to the balance between the amount of greenhouse gas produced and the amount removed from the atmosphere. We have established near-term (2030) and long-term (2040) emissions reduction targets in line with the SBTi Net Zero Standard.

Our greenhouse gas emissions and carbon intensity ratios are disclosed on page 49 and these form part of our key metrics.

We have committed to reach net zero greenhouse gas emissions across our value chain by 2040, committing to:

- Reduce absolute Scope 1 and 2 GHG emissions by 50% before 2030 from a 2023 base year.
- Reduce absolute Scope 3 GHG emissions by 46.2% over the same timeframe.
- Reduce absolute Scope 1, 2 and 3 GHG emissions by 90% by 2040 from a 2023 base year.

Our Net Zero roadmap visualises our emissions reduction from our 2023 base year until 2040. This roadmap does not yet account for business growth or incorporate the impact of actions and initiatives that we will use to achieve our target. Although we have started to quantify these, further work is required to fully model these into our roadmap. We intend to overlay these into our roadmap in the future, to further embed them into our business and financial planning, and to issue an updated roadmap in the next iteration of our transition plan.

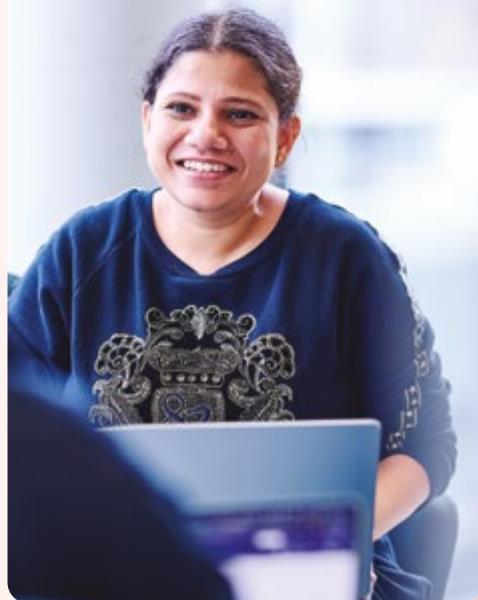
To meet the SBTi's definition of net zero, we need to reduce our emissions by at least 90%. It is therefore essential that we fully understand the source of our emissions and undertake targeted actions. Our SBTi approved targets have been updated to include the impacts of acquiring the Autorama business in 2022.

The make-up of our carbon emissions is heavily weighted towards Scope 3, and within that purchased vehicles, use of sold goods and other purchased goods and services are the biggest contributors.

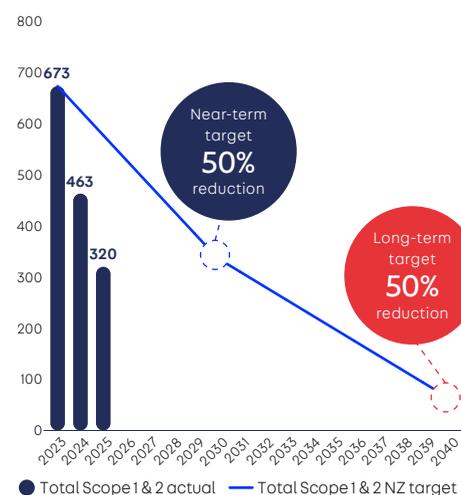
To monitor progress against our environmental strategy, we have key metrics and targets. We also disclose our Scope 1, 2 and 3 GHG emissions.

The Group is required to report its energy use and measure and report its direct and indirect greenhouse gas ('GHG') emissions by the Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018. The GHG reporting period is aligned to the financial reporting year.

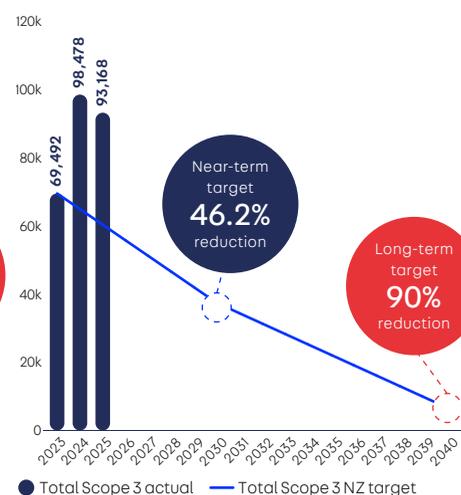
Reported energy and GHG emissions data is compliant with SECR requirements and has been calculated in accordance with the GHG Protocol and SECR guidelines.



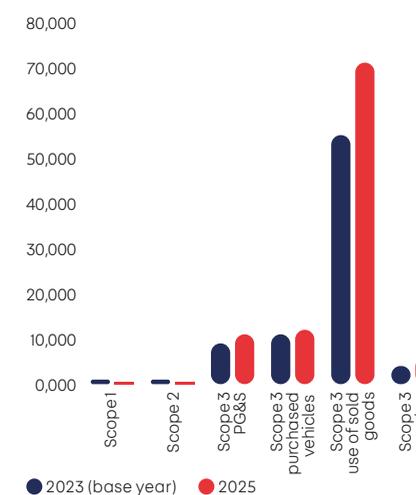
#### Scope 1 & 2 reduction target (tonnes of CO<sub>2</sub>)



#### Scope 3 reduction target (tonnes of CO<sub>2</sub>)



#### Our emissions (tonnes of CO<sub>2</sub>)



## Working responsibly continued

AMBITION

ACTION

ACCOUNTABILITY

**METHODOLOGY**

The methodology used to calculate emissions is based on the financial control consolidation approach, as defined in the Greenhouse Gas Protocol, A Corporate Accounting and Reporting Standard (Revised Edition).

Emission factors used are from the UK Government's GHG Conversion Factors for Company Reporting, and selected other emissions factor datasets as applicable, for the year reported. For Scope 3 Category 1, an Environmentally Extended Input Output database methodology was used to calculate the GHG footprint across total spend in the year.

**INDEPENDENT VERIFICATION OF OUR GHG EMISSIONS**

EcoAct has independently assessed and verified Auto Trader's GHG emissions following verification standard ISO 14064-3:2019. Based on the data and information provided by Auto Trader and the processes and procedures followed, nothing has come to EcoAct's attention to indicate that the GHG emissions totals for all years reported are not fairly stated and free from material error.

**ENERGY AND EMISSIONS REPORTING**
**Our total CO<sub>2</sub> emissions<sup>1</sup>**

	2025		2024	
	UK	Global	UK	Global
Scope 1	116	116	258	258
Scope 2 (location based)	204	204	205	205
<b>Total (Scopes 1 and 2)</b>	<b>320</b>	<b>320</b>	<b>463</b>	<b>463</b>
KwH ('000s)	1,277	1,277	1,448	1,448
Purchased goods and services		19,457		22,949
Capital goods		1,375		2,262
Fuel and energy-related activities		91		74
Upstream transportation and distribution		-		-
Waste generated in operations		100		107
Business travel		933		1,041
Employee commuting (inc. working from home)		725		982
Upstream leased assets		-		-
Use of sold products		69,950		70,643
End of life treatment of sold products		172		383
Investments		45		37
<b>Scope 3 (total)</b>		<b>92,848</b>		<b>98,478</b>
<b>Total (Scopes 1, 2 and 3)</b>		<b>93,168</b>		<b>98,941</b>
Group revenue		£601.1m		£570.9m
Tonnes of CO <sub>2</sub> equivalent per FTE <sup>2</sup>		73.5		80.2
Tonnes of CO <sub>2</sub> equivalent per £million turnover		155.0		173.3
Scope 2 (market based)		0.1		10
% renewable		99%		95%
Auto Trader total emissions		9,903		14,169
Autorama total emissions		83,265		84,772

1. Scopes 1, 2 & 3 are reported in tonnes of CO<sub>2</sub> equivalent.

2. Based on average number of employees in the Group throughout the year 2025: 1,267 (2024: 1,233).

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## Our approach to climate governance

We have integrated climate governance into our existing governance processes and sought to embed responsibility for the risks associated with climate change throughout our business, adopting a climate change focused mindset. There is a clear commitment from the Board to deliver on our environmental commitments and ensure relevant accountability across the business. Our environmental strategy was initiated to ensure a joined up approach across the business considering the risks and opportunities climate issues pose and how we are responding to them.

We submitted our annual CDP questionnaire and received a B rating in December 2023; we are awaiting our 2024 score. The rating is on a scale from A (best possible score) to D-. Our current rating indicates that Auto Trader has knowledge of impacts on, and of, climate issues and that we are taking coordinated action on climate issues.

### TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES ('TCFD') COMPLIANCE STATEMENT

The Group has prepared its TCFD disclosures in line with guidance from the 2021 updates to the TCFD Final Report and Annex, including the supplementary guidance for all sectors. At the time of publication, in accordance with the UK's Financial Conduct Authority ('FCA') Listing Rule 9.8.6R(8), the Group has made climate related financial disclosures consistent with the TCFD recommendations and recommended disclosures set out on page 94. The table included in the Corporate Responsibility Committee report (page 92) summarises where the relevant disclosures are addressed. We continue to develop our net zero strategy and to identify the risks and opportunities to our business as a result of climate change and the potential financial impact. The climate related financial disclosures made by the Group comply with the requirements of the Companies Act 2006 as amended by the Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022.

## HOW WE GOVERN THIS AREA



### 1. BOARD RESPONSIBILITY

The Corporate Responsibility Committee is responsible for holding the Executive Directors to account with respect to climate risks and opportunities and their impacts on both the business and the wider environment. Our environmental strategy is a standing agenda item for all Committee meetings.

### 2. EXECUTIVE RESPONSIBILITY

The responsibility for assessing and managing climate related risks and opportunities sits at both Executive and Board level. Executive responsibility for our impact on climate change is held by all our Executive Directors, who have responsibility for overseeing our environmental strategy. Responsibility for the consideration of climate related risks and opportunities on the financial performance of the Group and compliance with environmental reporting sits with our CFO, Jamie Warner.

### 3. RISK FORUM

Our Risk Forum undertakes a review of climate related risks with our Auto Trader Leadership Team ('ALT').

Environmental risks are also reviewed at least twice a year as part of the overall risk review process.

### 4. REMUNERATION COMMITTEE

The Committee introduced ESG-related targets into the Performance Share Plan ('PSP') for the first time in 2021. The PSP includes a specific performance target linked to a reduction in our GHG emissions.

### 5. THIRD-PARTY ASSURANCE

Our GHG emissions have been independently assured by EcoAct using ISO 14064-3 for all scopes of our carbon footprint.

### 6. ENVIRONMENTAL WORKING GROUPS

Our environmental strategy not only focuses on our own environmental impact, but also aims to support our customers, consumers and the industries in which we operate and, as a result, various parts of the business play a part in delivering our ambitions. Different parts of the business are brought together through our Environmental Strategy working group, which is sponsored by members of our ALT. Key activities and milestones are set for each financial year and these are shared with the Corporate Responsibility Committee. The Environmental Strategy working group is responsible for our commitment to net zero, which is in line with our SBTi targets. This group also identifies ways in which we can support the tech and automotive industries, alongside helping consumers make more environmentally friendly vehicle choices.

### 7. EMPLOYEE GUILDS & NETWORKS

Our employees play a fundamental role in the success of our environmental strategy. Our Sustainability Network comprises passionate individuals from across the business who are focused on making life at Auto Trader more sustainable. They do this through increasing employee awareness and driving impactful changes for both individuals and our business, supporting our overall goal of reducing our carbon emissions.

## TARGETS AND METRICS

### Our operations

SBTi approved near and long-term targets (see page 34).

### Supporting the automotive and technology industries

Number of EVs advertised on Auto Trader  
**33,603**  
average as at March 2025 (2024: 22,536)

Share of EVs advertised on Auto Trader  
**5.6%**  
during FY25 (FY24: 4.5%)

Number of EVs delivered by Autorama  
**950**  
during FY25 (FY24: 876)

Number of videos produced covering EVs  
**41**  
during FY25 (FY24: 56)

### Supporting consumers

Number of EV advert views on Auto Trader  
**150 million**  
during FY25 (FY24: 105 million)

Share of EV advert views on Auto Trader  
**5.0%**  
during FY25 (FY24: 3.7%)

Number of EV giveaway entries  
**15.5 million**  
since campaign started (FY24: 10.8 million)

Number of video views covering EVs  
**6.5 million**  
during FY25 (FY24: 7.9 million)

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Working responsibly continued



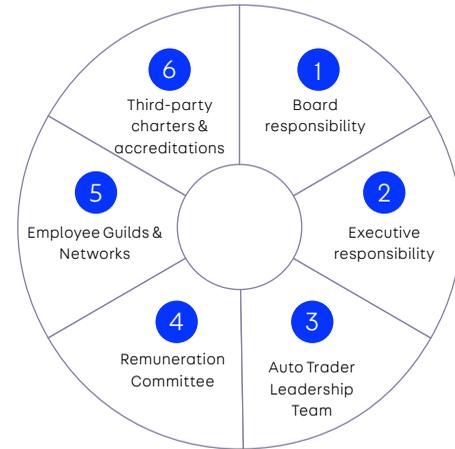
## Our people & communities

Our values underpin everything we do.

### SUPPORTING THE UN SDGS MOST RELEVANT TO OUR STRATEGY



### HOW WE GOVERN THIS AREA



#### 1. BOARD RESPONSIBILITY

Material ESG topics discussed by the Board include diversity and inclusion, employee engagement and talent development. The Corporate Responsibility Committee is responsible for holding the Executive Directors to account and on a quarterly basis our people scorecard is reviewed and progress against our cultural KPIs is monitored. The Board plays an important role in ensuring our culture is aligned with our long-term strategy.

#### 2. EXECUTIVE RESPONSIBILITY

The responsibility for assessing and managing our people and culture sits at both Executive and Board level. Our Executive Directors have responsibility for oversight of our diversity and inclusion agenda and are responsible for ensuring that our values are embedded into all parts of our business.

#### 3. AUTO TRADER LEADERSHIP TEAM

Our Auto Trader Leadership Team ('ALT') is responsible for driving our culture that is values-led, customer-centric and data driven, underpinned by a diverse and inclusive team. Having a progressive culture and environment ensures the attraction, development and retention of a talented, engaged and diverse workforce.

#### 4. REMUNERATION COMMITTEE

The Committee introduced diversity-related metrics into the Performance Share Plan ('PSP') targets for the 2021 PSP award. From 2022 onwards, PSP award performance will be measured against our diversity ambitions as part of an underpin rather than as a standalone target. The Committee also has remit over material changes to package and benefits and approved the all-employee share scheme.

#### 5. EMPLOYEE GUILDS & NETWORKS

Our employees play a fundamental role in the success of our ESG strategy. Through our thriving networks and guilds, our ESG priorities and ambitions are championed and driven forward by our employees. See page 54 for more information about our networks.

Our Board Engagement Guild is the primary mechanism for our Board to engage with our employees and meetings are not attended by the Executive Directors. Employees are able to share their experiences and views, as well as providing the opportunity for them to ask questions directly of Non-Executive Directors. The Board Engagement Guild has representatives from across different parts of the business and canvasses views and opinions from their colleagues to share with the Board.

#### 6. THIRD-PARTY CHARTERS & ACCREDITATIONS

We have signed up to various third-party charters and have received a number of accreditations, most notably:

- Race at Work Charter
- Change the Race Ratio
- Disability Confident
- Social Mobility Top 75
- Inclusive Companies
- Living Wage Employer

### OVERVIEW

Being a responsible employer and maintaining a strong, purpose-led culture is key to our ongoing success. Our values underpin everything we do, reflecting our culture and commitment to making a positive impact.

### ENGAGING OUR EMPLOYEES

We value effective communication and engagement with our employees, continually reviewing and improving based on feedback. We conduct regular surveys, including an anonymous one twice a year, to assess engagement and job satisfaction. In our latest engagement survey, 91% (2024: 97%) of employees agreed or strongly agreed with the statement "I am proud to work for Auto Trader", a measure which we view as a proxy for engagement. We enhance these surveys with pulse and post-event surveys as needed.

Our Board Engagement Guild allows direct engagement between our Board and employees, facilitating questions and sharing employee experiences and views. This year, the Guild met three times, discussing topics such as what employees find great about working for Auto Trader and what they would like to see done differently; Directors' remuneration; employee engagement and trust; and sentiment around organisational changes. A key part of engaging our employees is to ensure senior leaders are visible throughout the business and accessible to staff delivering our business objectives. We aim to ensure our employees are regularly kept up to date with the key aspects of our business strategy and priorities, and understand their role in achieving them, which is important to maintaining our purpose-led culture across the business. As a result, we provide various internal communication channels including regular 'ALT' sessions led by our CEO and leadership team, as well as our bi-annual all-employee conferences.

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## Working responsibly continued

We have continued to embrace Connected Working, our hybrid working model which offers greater flexibility in where and how our employees work. Central to this approach is the importance we place on staying connected, while maintaining collaboration within teams and the wider Auto Trader community. In early 2026, we'll be relocating our head office to Bruntwood SciTech's Circle Square – right in the heart of Manchester's tech community. Once the fit out is completed, the purpose-built environment with state-of-the-art workspaces will not only support our employees staying connected, but it will also bring us even closer to our customers and industry peers, providing a collaborative space to share insights, data, and experiences.

### PAY AND BENEFITS PACKAGE

We offer a comprehensive pay and benefits package, including employee pension contributions up to 7%, private medical cover, income protection, life assurance and enhanced family/dependant leave provisions. In FY25 we introduced our retirement benefit to support those employees ready to transition to retirement.

Share ownership is fundamental to who we are as a business and is a great way to reward our staff, which is critical for the long-term sustainable success of our business. FY25 saw the second award of our One Auto Trader Share Award ('OATSA') scheme, an all-employee share award scheme that rewards employees with an additional 10% of their salary in shares, vesting over a three-year period. In addition, we provide an annual SAYE scheme, with 53% of our employees actively contributing to one of the current schemes.

### WELLBEING AND SAFETY OF OUR EMPLOYEES

We are committed to supporting our employees in all aspects of their health and wellbeing. We provide a comprehensive range of healthcare benefits as well as access to tools and education, mental health support and

supportive pathways to empower our employees to have more good days. During the year, people leaders have the opportunity to attend a refresher course in mental health awareness to assist them in identifying and supporting issues that relate to people's mental health and learn practical skills that can be used every day to help support team members. Access to mental health support and services is made available to all employees via trained Mental Health First Aiders and the Employee Assistance Programme.

We have a comprehensive 'Respect at Work' Policy, which emphasises the importance of maintaining a safe and respectful environment. The policy details cultural expectations and employee rights regarding bullying, discrimination and harassment, including sexual harassment, and explains our zero tolerance stance. It also outlines the reporting process and sets standards for upholding these principles outside of the workplace and during the course of employment. We provide employees with sexual harassment training and awareness sessions, including specific training on how to identify and report harassment by third parties. The training ensures that all employees understand their rights under the Equality Act 2010 and the Company's expectations regarding inappropriate behaviour.

We provide access to tools and resources to support employees with their financial wellbeing, including access to mortgage advisors and will writing services, season ticket travel loans and salary finance.

We are committed to creating a safe office environment and to achieving high standards of health and safety and to protecting our staff and others affected by our operations. Our principal objective is to prevent or minimise accidents, injury and ill health to staff, contractors and others who work at or visit our premises. We have a fully compliant Health and Safety Policy and appropriate insurance for all employees. We can report that we have had no fatalities or serious

injuries during the year, and there was no impact to our operations due to work-related incidents or work-related occupational disease. We have had no accidents reportable to RIDDOR this past financial year.

Within our Connected Working approach, we remain committed to our people's health and wellbeing. To support our employees, we make sure that their workstations are safe by completing DSE risk assessments of both office and home-based workstations and environments. These assessments ensure compliance with health and safety regulations and help to identify and minimise risks while working from home or the office.

### INVESTING IN AND SUPPORTING OUR TALENT

The quality of our people and the development of a robust and diverse talent pipeline for the future are essential to delivering our long-term growth strategy. Our objective is to attract and retain talent across the organisation, providing them with opportunities for personal growth that will help us to achieve our goals while enabling them to fulfil their potential.

We are committed to ensuring that our employees have the time and opportunity to pursue their development. To support this, we are focusing on developing our People Managers and our People team, enabling personal development plans, a coaching approach across learning, and structured programmes with self-learning. We pride ourselves on having a community focused on development where everyone can be successful. We still retain a strong level of retention and employee engagement and our attrition rate remains low at 10% (2024: 11%) when compared to industry and national averages.

We recognise that People Managers are one of our most important partners in development. As a central objective of our People team, we are investing in the development of our People Managers. Through conversations with them,



we have designed our expectations of management at Auto Trader. Our focus now is to create stronger boundaries through our policies for People Managers and a development framework to support their abilities.

Our Learning Academy is central to our community-focused development approach. We offer accessible courses for everyone across the business (including part-time and contractors). Coaching and mentoring are primary approaches for us in learning, including the training of 50 employees to be qualified coaches. Training our People Managers to be coaches is also a focus for our manager development. We offer sponsorship for professional qualifications and help our people maintain continuous professional development.

Our mandatory training covers our compliance needs, ensuring we meet legislative and regulatory requirements. We also have 'always on' sessions that support our ways of working with role-specific technical skills and soft skills. These are available for all employees and accessible through the Learning Academy system.

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## Working responsibly continued

### EARLY CAREERS

We have a dedicated Early Careers team which plays a vital role in nurturing the future success of Auto Trader. We take immense pride in our exceptional pipeline of talented individuals who are carefully developed to assume key roles across various departments in the business. Our team is committed to identifying opportunities, crafting innovative programmes and delivering comprehensive support to facilitate the growth and success of early careers, retraining and professional development for employees at Auto Trader.

In FY25 we welcomed 38 apprentices and graduates to the Early Careers Academy (including internal career changes). Our apprentices enjoyed great success this year and we celebrated seven apprentices completing their level 3, 4 and 6 apprenticeships.

### LEADERSHIP DEVELOPMENT

During the year we expanded our leadership team to form the Auto Trader Leadership Team ('ALT'). The ALT takes responsibility for the overall stewardship, culture and performance of Auto Trader, including our strategy and priorities and how we work together. In line with the

changes, the ALT have all taken part in an onboarding programme aiming to introduce them to their new roles.

We have continued with our Diverse Talent Accelerator programme designed to support the progression of mid-career employees.

Year	2025	2024
Hours of mandatory training	2,328	1,113
Hours of non-mandatory training	28,291	27,363
Annual cost of training <sup>1</sup>	£476k	£633k
Average cost per employee <sup>2</sup>	£376	£513
Employees studying for professional qualification	16	8
Employees on an apprenticeship/early careers <sup>3</sup>	66	71

1. This includes external trainer and platform costs, but excludes the employment costs of our in-house Learning & Development team.
2. Based on average number of employees in the Group throughout the year 1,267 (2024: 1,233).
3. As at 31 March - this excludes individuals who completed their programme during the reporting period.

### DIVERSITY AND INCLUSION

At Auto Trader, we value a diverse and inclusive workforce, which enhances our culture and business by attracting and developing talent. Diversity and inclusion unlock the full potential of our people and, consequently, our business. A mix of ideas and perspectives is essential for innovation and creating the best experience for our customers and consumers.

Diversity includes gender, sex, age, sexual orientation, disability, neurodiversity, race, ethnicity, religion, faith, marital status, social background, educational background, and way of thinking. Inclusion means being valued, respected and supported for who you are.

We aim to achieve this authentically and systematically, reflected in our metrics over time. We're committed to long-term change in the technology and automotive industries, focusing on developing diverse leaders and representative workforces. We continue to strive for diverse representation at every level of the Company, with a particular focus on leadership. Our representation of women at a total company level remained consistent at 44% (2024: 44%).

This year, the percentage of women on our Auto Trader Leadership Team ('ALT') is 38% (2024: 50%). We increased the percentage of women in leadership roles to 43% as at 31 March 2025 (March 2024: 42%), as defined by the FTSE Women Leaders Review.

We aim to build a diverse candidate pool for internal development and succession planning by identifying diverse talent for senior roles, ensuring equitable representation. In FY25, we refined our Inclusive Culture Development Programme, designed to support us in achieving our aims. This programme focuses on enhancing our talent management, succession planning and leadership development initiatives.

We remain committed to supporting disabled and neurodiverse employees and those who become disabled during their employment with us. Recognising that everyone is unique, we provide the right support to ensure they continue to realise their full potential and develop their careers with us. Selection for employment, promotion, training and development (as well as other benefits and awards) is made based on merit, aptitude and ability and the Group does not tolerate discrimination in any form, including in relation to disabled candidates.

We are very proud that Auto Trader has continued to be recognised as a Leader of the Disability Confident Scheme and one of the Top 75 (ranking 29th) employers in the Social Mobility Employer Index by The Social Mobility Foundation, signifying our commitment to inclusivity and supporting individuals with disabilities.

### EARLY CAREERS ACADEMY

Our Early Careers Academy is designed to support the onboarding, knowledge, skills, behaviours, wellbeing and continuous development of everybody on one of our Early Careers programmes, which include graduate programmes, apprenticeships and internships.



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**INCLUSIVE CULTURE DEVELOPMENT PROGRAMME**

Auto Trader's Inclusive Culture Development Programme is a series of learning and development programmes driven throughout the business, with diversity and inclusion at their core.

**ONE AUTO TRADER – A CULTURE OF INCLUSION**

As part of Auto Trader's 'Great Start', all new starters must attend this workshop.

In one day, colleagues gain a common understanding of diversity and inclusion at Auto Trader, meet representatives from our Employee Networks and explore different biases and how to call out behaviour that goes against inclusion.

**INCLUSIVE RECRUITMENT**

When it comes to recruitment and selection, all those that are part of the hiring process take part in a full day workshop around inclusive recruitment. These sessions raise awareness of bias, share best practice, introduce our scoring frameworks and allow assessors to develop their shortlisting and interview skills.

**INCLUSIVE LEADERSHIP**

This is aimed at equipping leaders with the 'know how', skills and insights required to lead diverse teams in an inclusive way. Leaders are educated on the benefits of leading inclusively and are equipped with the tools to enhance their leadership style which will inspire them to re-evaluate how they lead others and create an inclusive culture across Auto Trader.

**DIVERSE TALENT ACCELERATOR PROGRAMME ('DTA')**

The aim of DTA is to accelerate the progression of high potential talent in order to create a pipeline of diverse future leaders.



The programme offers a range of experiential and group learning, coaching and sponsorship.

We encourage undiscovered talent to apply, particularly colleagues from groups that are under-represented in our senior leadership teams including those that are people of colour, women, LGBT+, disabled and neurodiverse, and from a lower socio-economic background.

**THE BLACK EXPERIENCE**

The workshops were designed and are being delivered by the People team in collaboration with our black employees and aim to increase awareness and appreciation of the challenges black employees face in and out of the workplace. Through the workshops we also aim to highlight the behaviours that people leaders can utilise in order to enhance black inclusion.

**NEURODIVERSITY AND MENTAL HEALTH MANAGER AWARENESS**

On top of the general Mental Health Awareness training, we have recently launched Neurodiversity and Mental Health Manager Awareness training, which is specially designed to empower People Managers with the knowledge and confidence to engage in meaningful conversations about neurodiversity and mental health in the workplace.

**DRIVING DIVERSITY AND INCLUSION THROUGH OUR EMPLOYEE-DRIVEN NETWORKS**

A core part of our people and culture strategy is centred around our employee-driven networks. Everyone at Auto Trader is encouraged to join one of these networks. The networks and their leaders are a core part of our culture, helping to welcome employees when they join our organisation, empowering team members to thrive and spearheading outreach programmes that support our local communities. We ensure each network has a senior leadership sponsor to help drive change and champion network initiatives.



The Career Kickstart Network brings together employees in their early careers from across the business to learn and grow together through shared experiences, resources and discussion.



Our Disability & Neurodiversity Network continues to create a more accessible and inclusive environment for our employees. 13.3% (2024: 13.5%) of our employees have disclosed a disability or neurodiverse condition. The network partners with various charities including Research Institute for Disabled Consumers, Speed of Sight and the Business Disability Forum to educate employees and raise awareness.



The Ethnicity Network brings together employees from across the business to raise awareness and drive positive change for our employees, customers and communities who are currently under represented ethnically. With an aim to create an even more inclusive workplace where everyone feels valued, respected and empowered to contribute to their fullest potential.



Our LGBT+ Network representation is currently 10.8% (2024: 10.0%) and the network has continued to support our employees and connect with local LGBT+ charities, including The Proud Trust and the George House Trust.



Through building an internal community within the business, the Parents' Network helps create an environment for employees to support each other in navigating the challenges of being working parents.



Our Social Mobility Network is focused on understanding how socio-economic background can influence individuals in the workplace and working to remove barriers and open opportunities. Auto Trader has signed the Social Mobility Pledge, committing to putting social mobility at the heart of what we do, with 74% of our people sharing social mobility data.



Our Women's Network is focused on improving and evolving representation of women at all levels in Auto Trader, the automotive industry and the digital communities within which we operate, by recruiting, retaining and developing female talent.

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## Working responsibly continued

### GENDER AND ETHNICITY DIVERSITY

As at 31 March 2025, Board membership is comprised of six women and three men, exceeding the FTSE Women Leaders Review recommendations and FCA Listing Rules requirements, which have a target of 40% women's representation. A woman is appointed as Senior Independent Director, meeting the targets set out in the Listing Rules at LR 9.8.6 (9)(a). Two Board members are from an ethnically diverse background, meeting the recommendation of the Parker Review.

The percentage of the total company who are from an ethnically diverse background has increased from 17% to 19% during the year, with the percentage of those from an ethnically diverse background in leadership increasing from 6% to 10%, although changes to our Auto Trader Leadership Team ('ALT') have contributed to the increase. We remain committed to increasing ethnically diverse representation in leadership. As was the case with women, we are focused on our recruitment processes, the majority of which are in lower level roles, and how we develop and promote a diverse group of individuals through the organisation.

Last year, the Parker Review extended its scope to senior management, asking the FTSE 350 to set a percentage target for senior management positions that will be occupied by ethnic minority executives in December 2027. We have set a target of 10% for ethnically diverse senior management (ALT and ALT-1) to be achieved by March 2027 in line with the Parker Review.

	As at 31 March 2025										As at 31 March 2024							
	Board			Executive management ALT <sup>2</sup>		ALT direct reports <sup>3</sup>		Total Company		Board			Executive management OLT <sup>2</sup>		OLT direct reports		Total Company	
	Number	%	Number of senior positions <sup>1</sup>	Number	%	Number	%	Number	%	Number	%	Number of senior positions <sup>1</sup>	OLT <sup>2</sup>	%	Number	%	Number	%
Men	3	33%	3	11	61%	50	56%	721	56%	4	44%	4	4	44%	41	59%	701	57%
Women	6	67%	1	7	39%	40	44%	562	44%	5	56%	-	5	56%	28	41%	548	43%
Non binary/other	-	-	-	-	-	-	-	7	-	-	-	-	-	-	-	-	6	-

	As at 31 March 2025										As at 31 March 2024							
	Board			Executive management ALT <sup>2</sup>		ALT direct reports		Total Company		Board			Executive management OLT <sup>2</sup>		OLT direct reports		Total Company	
	Number	%	Number of senior positions <sup>1</sup>	Number	%	Number	%	Number	%	Number	%	Number of senior positions <sup>1</sup>	OLT <sup>2</sup>	%	Number	%	Number	%
White British or other	7	78%	3	17	94%	73	81%	948	74%	8	89%	4	9	100%	59	86%	909	72%
Mixed ethnic groups	-	-	-	-	-	1	1%	36	3%	-	-	-	-	-	-	-	26	2%
Asian /Asian British	2	22%	1	1	6%	7	8%	144	11%	1	11%	-	-	-	4	6%	129	10%
Black/ African /Caribbean /Black British	-	-	-	-	-	2	2%	50	4%	-	-	-	-	-	1	1%	42	3%
Other	-	-	-	-	-	-	-	16	1%	-	-	-	-	-	-	-	19	2%
Not disclosed	-	-	-	-	-	7	8%	96	7%	-	-	-	-	-	5	7%	130	11%

1. Senior positions defined as CEO, CFO, SID and Chair of the Board.

2. Excludes CEO, COO and CFO who are included in the Board numbers.

3. In 2025 we extended our leadership team from 12 individuals (previously our Operational Leadership Team, 'OLT') to 21 individuals (now called our Auto Trader Leadership Team, 'ALT'). We define leaders as those who are on our ALT and its direct reports, excluding those with senior and principal job titles in Product & Tech.

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## Working responsibly continued

### GENDER AND ETHNICITY PAY GAP

We released our fifth combined Gender and Ethnicity Pay Gap Report 2024 (published in November 2024, reporting the pay gap as at 5 April 2024). We welcome the new Government's commitment to introducing disability pay gap reporting as a fundamental step for employers to gain a better understanding of its drivers and take steps to closing it over time. As we have done with our ethnicity pay gap, we are publishing our disability pay gap in advance of it becoming a mandatory requirement and have included a high-level analysis in this year's report. We will work with our peers across our industries and the Government to support the introduction of mandatory pay gap reporting for ethnicity and disability in the coming years. You can read our Gender and Ethnicity Pay Gap Report on our corporate website ([plc.autotrader.co.uk](http://plc.autotrader.co.uk)).

We are pleased to report that we continue to make progress in reducing our gender pay gaps. Our mean gender pay gap decreased by 0.2% (2023: 2.3% decrease), and our median pay gap decreased by 0.7% (2023: 3.3%). We continued to make good progress during the reporting period in retaining women in upper quartiles within our business, with only 15% of leavers coming from this group, compared to 53% for men.

Overall, we have increased our women hires, with 52% of all new starters being women within the last 12 months, a 6% increase year-on-year. We are pleased to have achieved our goal of reaching an equal gender split across our recruitment campaigns. This year, we have further strengthened our maternity and family leave policies to provide even greater support for women and families throughout their careers. We also introduced our Company funded Menopause Plan which provides personalised support for employees struggling to manage their symptoms. We believe these enhancements will further boost our retention of women in the future. We do however recognise that there is still work to do here, specifically maintaining that equal representation when hiring into senior roles.

When we take a closer look at our colleagues who have been in consecutive pay gap reports, we can see that the biggest movement for women was in the lower middle and upper middle quartiles. Both quartiles saw 22% of existing women move upwards year-on-year which points to an important element of our diversity strategy – growing our own pipeline of talent. Firstly, the movement from the lower to lower middle quartile highlights our continued commitment to develop our Early Careers talent, with this move into the lower middle quartile of ten coinciding with the step into Professional level roles. Secondly, we are pleased to see the continuation of that pipeline in the upper middle quartile, which saw an increase of 3.8% this year. Our promotions contributed to this increase, with 25% of women who were promoted between April 2023 and March 2024 moving up a quartile compared to 17% of men.

During the reporting period, we have seen both our median and mean ethnicity pay gaps increase with the median increasing by 4.1% and the mean by 2.3%. However, we have seen our overall representation of Ethnically Diverse employees increase by 3%, with all quartiles growing apart from the upper middle quartile.

When we analyse the data, the increase in our pay gaps is primarily driven by the positive steps we are taking to increase representation of Ethnically Diverse employees. Our biggest source of hiring is Early Careers, so as we increase the diversity at Early Career level, they join us at the lower quartile pay level, which negatively impacts our pay gap in the short term, particularly the median. Nevertheless, we are pleased to report that 43% of our Early Career intake during the reporting period were from Ethnically Diverse backgrounds and we will continue to focus on this important element of our strategy to grow our own diverse future leaders.



At Auto Trader, we believe that pay gap reporting is an important tool to aid transparency and create accountability in our equality, diversity and inclusivity journey. We have made the decision to report on our disability pay gap ahead of the anticipated policy change to make both ethnicity and disability pay gap reporting mandatory for all businesses with over 250 employees. We've opted to use the same binary methodology for our Disability Pay Gap report as we do for our Ethnicity Pay Gap report. This means that any employees who have not disclosed their data will be omitted from the analysis. We classify employees as having a disability if they have chosen to declare a long-term condition or disability in our people system. Our mean disability pay gap for the reporting period was 5.9% with the median disability pay gap being 1.9%.

As this is our first year of reporting, we currently lack comparable figures. Moving forward, as we gather more data, we are committed to implementing action plans aimed at reducing these gaps and enhancing equality in our workplace.

**43%**  
of our Early Career intake last year were from ethnically diverse backgrounds

**52%**  
of all new starters were women

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### MAKING A DIFFERENCE TO OUR COMMUNITIES AND THE INDUSTRIES WE OPERATE IN

Our Auto Trader community shapes our culture and we are committed to making a difference and having a positive impact on the communities we operate in.

This year we are celebrating 10 years of our Make a Difference Guild. The Guild is committed to empowering our employees to support national and local charities and communities, supporting the causes that are close to their hearts and delivering real and visible change to our communities.

Employees can take up to two days a year to volunteer in the community. This year 606 days were taken by our employees to volunteer in the community. Our Auto Trader Community Funds aim to deliver financial support to local community groups and charities in our office locations of Manchester, London, Hemel Hempstead and across the UK.

Through our AT Sponsorships we continue to support employees' and customers' fundraising efforts and we also provide funding for sports equipment and kit sponsorship for our employees and their families. Our employees can also support charities close to their hearts through payroll giving, with 20% of employees choosing to donate to charities using this method. Auto Trader supports this further through match funding up to £5 per month for every employee signed up to payroll giving and also by entering all employees who are signed up into a monthly prize draw with the chance to win a further £500 for the employee's chosen charity.

With Auto Trader operating in both the automotive and technology industries, we continue to partner with the charity BEN, making a significant contribution to the charity on behalf of our customers and partners. BEN is a key charity supporting the automotive industry with the aim to offer life-changing support which empowers people to take control of their mental and physical health. This year we have continued our partnership with Speed of Sight, a local charity that gives life-changing driving

experiences for the blind and disabled, running track events for people of all ages regardless of ability or disability.

To help tackle digital exclusion, we work with local charities to repurpose our laptops and devices. This allows us to repurpose our old tech efficiently and sustainably, while supporting communities and individuals to tackle digital poverty and promote digital inclusion.

We have continued our partnership with Forever Manchester who support us in running our well established Auto Trader Community Fund. The fund provides support for a wide range of community projects across Greater Manchester, delivering meaningful social impact to a wide range of grassroot community projects. This year we also worked with Forever Manchester to set up the Auto Trader Digital Inclusion Fund. Through the fund, we are thrilled to have supported four local charities in the Greater Manchester area. These charities will each be using the funds to run technical workshops and programmes in order to upskill members of the local community and reduce the digital divide.

We are proud to be a member of the Automotive 30% Club, a group focused on increasing the representation of women in the automotive industry, focusing on recruiting, retaining, and developing female talent within the industry. Catherine Faiers, COO at Auto Trader, is a patron of the Automotive 30% Club, and this year was named as the winner of the Automotive 30% Club IMI Inspiring Automotive Woman of the Year Award.

To further support the goals of the Automotive 30% Club, this year we launched a new award category, Auto Trader Woman of the Year, as part of our annual Auto Trader Retailer Awards, designed to recognise the exceptional women in automotive retail. The award will celebrate an inspiring woman working within an operational management role in a retail organisation who is delivering results and destined to be a future leader. We also collaborated with the Automotive 30% Club and the Consent Collective to spearhead a new initiative, 'Great Events for All', to educate

the automotive industry on sexual harassment and consent to ensure industry events are safe and inclusive. We have continued with our podcast series, 'Women in the driving seat', that explores the challenges and successes of women in the automotive industry.

This year, we collaborated with DigitalHER, DigitalFutures, and GM Enterprise Advisors to host Career Safari days at our Manchester office. Young people from Greater Manchester enjoyed career talks, activities, sponsorship, and workshops. We also launched Curiosity Camps with DigitalHER for women interested in tech careers. We've committed to supporting young women at the start of their tech careers through MentorHER and we also worked with Pursuing Individual Excellence, reaching students through networking events. We actively support the Manchester Baccalaureate and are a Cornerstone Employer in the GM network. Colleagues are encouraged to be STEM Ambassadors and volunteer as mentors with the Social Mobility Foundation.

Over the past year, Auto Trader has hosted a variety of meetups in our dedicated event space, bringing together data, design, delivery and tech community groups. This reflects our commitment to supporting community engagement and knowledge sharing within Manchester. We've built strong relationships with groups like PyData, Natter UX, and Manchester Java Community through recurring events and ongoing sponsorship, helping them thrive and continue enriching the local tech and design communities.

This year, we have hosted various events to highlight the importance of social mobility: we hosted an event encouraging more tech businesses to consider the importance of social mobility; and our Social Mobility Network ran a series of events in the run up to Social Mobility Awareness Day to lift the lid on class and address social mobility imbalance in the tech industry. The Tech Charter recently reported that only 9% of tech employees are from a lower working class background. This compares with 33% of employees at Auto Trader, but despite this,

we still have work to do to better represent the communities within our reach, with the national average sitting at 39%.

At Auto Trader, we are passionate about educational outreach and supporting students in our local communities. Throughout the year we hosted 30 students from Manchester schools and colleges for work experience. During National Careers Week and to celebrate International Women's Day, colleagues from Auto Trader went back to school to deliver talks and interactive sessions, reaching over 250 students. We've also given talks on apprenticeships at local colleges and hosted college students at our offices. We are a member of the Manchester Enterprise Advisor Group and are matched with two schools in Manchester to support with career strategy. We also offer a five day friends and family work experience.



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## Our governance & compliance

Uphold the values of good corporate governance and risk management and consider the needs of all our stakeholders in our strategic decision-making.

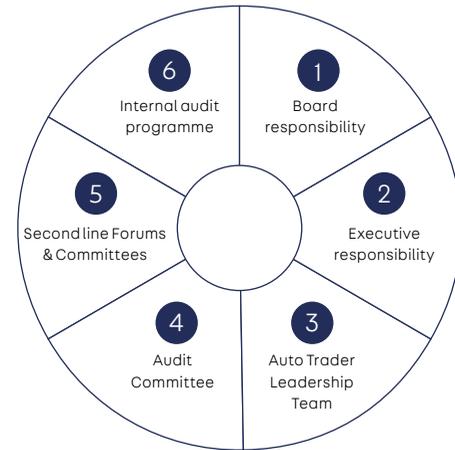
Comply with our legal and regulatory obligations and behave ethically and with integrity at all times.

Maintain a trusted marketplace for our customers and consumers to find, buy and sell vehicles.

SUPPORTING THE UN SDGS MOST RELEVANT TO OUR STRATEGY



### HOW WE GOVERN THIS AREA



#### 1. BOARD RESPONSIBILITY

Material ESG topics are discussed by the Board including cyber security and GDPR.

The Corporate Responsibility Committee assists the Board in fulfilling its oversight responsibilities in respect of governance and compliance, where topics have not been covered by the Board.

#### 2. EXECUTIVE RESPONSIBILITY

Responsibility for assessing and managing our governance and compliance sits at both Executive and Board level. Our Executive Directors have responsibility for ensuring we conduct ourselves with the highest standards of honesty and integrity.

#### 3. AUTO TRADER LEADERSHIP TEAM

The Group's Chief Technology Officer, Chris Kelly, is responsible for setting the Group technology strategy, including our cyber security programme.

The Group's Director of Governance, Claire Baty, is responsible for regulatory compliance, procurement, legal services and risk management. Her remit includes compliance with GDPR and FCA regulation.

#### 4. AUDIT COMMITTEE

Internal audit reports and assessments of the effectiveness of risk management and internal control frameworks are presented to the Audit Committee and monitored to ensure recommendations are actioned.

#### 5. SECOND LINE FORUMS & COMMITTEES

We operate the following regular second line forums and committees which report regularly to the Audit Committee:

- Risk Forum
- FCA Governance Committee
- GDPR Steering
- Cyber Security Forum
- Trust Forum
- Health & Safety Committee
- Disaster Recovery Steering

#### 6. INTERNAL AUDIT PROGRAMME

We operate a rolling internal audit programme which provides independent and objective assurance activities relating to the Group's governance, risk management and internal control processes. The programme includes regular reviews of cyber security, enterprise risk management, GDPR compliance and FCA compliance.



### OVERVIEW

We ensure high standards are embedded across the business through a compliance framework that includes policies, processes, guidance and training on core compliance topics.

As an online marketplace, a primary focus is on cyber security and data protection to maintain customer trust and support our shift to digital retailing. It is crucial that our cyber and data security infrastructure evolves with our business priorities. In 2025 we complied fully with the UK Corporate Governance Code 2018. Details of our Board governance framework and policies are available in the Governance section (from page 73).

### CYBER SECURITY

Trust is essential to our business. We prioritise the security of our services to protect our customers from cybercrime and fraud. As cyber attacks increase in volume and sophistication, they pose a significant and perpetual threat. A successful breach could harm our reputation with customers and regulators and be costly in terms of fraud losses, regulatory sanctions or remediation activity – one of our viability scenarios reflects the risk of a ransomware attack (see page 72).

Cyber security risks cannot be fully mitigated but by having an effective cyber security risk and governance framework we can reduce their impact. Our robust security programme covers both our corporate systems and the Auto Trader platform, under the supervision of our Chief Technology Officer. We employ a security by design process for products we develop and build for our customers and consumers with a defence in depth approach including multi-factor authentication for customers, least privilege access controls where required and appropriate and continuous testing of applications and products before, during and after deployment.

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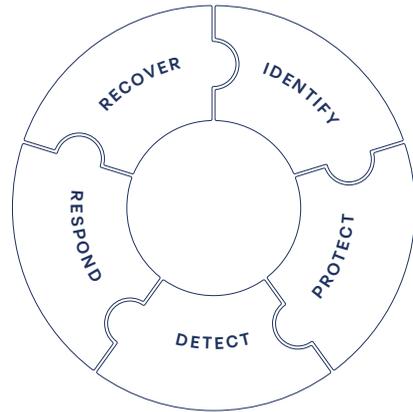
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## NIST CYBERSECURITY FRAMEWORK



## NIST Cyber Security Framework

We use the NIST Cyber Security Framework ('NIST CSF') to define, continuously improve, and effectively govern our cyber security operations. This helps us to identify areas for improvement and define target levels of maturity across the framework, complementing our existing business and cyber security operations. Our outsourced internal audit programme reviews cyber security regularly, and we also make use of annual 'red team' exercises to test the effectiveness of our defences. In FY25 we adopted the NIST version 2.0 and we increased headcount in this area.

## Policies and procedures

Our policies and procedures are designed to detect and respond to pre-emptive cyber attacks, risks and threats:

- An overarching Cyber Security Programme outlining the cyber security scope including the roles and responsibilities of the leadership team, cyber security forum and employees.
- A proactive awareness programme to educate all employees on cyber security risks.

- A suite of essential resources and policies designed to safeguard our organisation, our customers' and our employees' information and assets. These policies cover acceptable use, asset management, access control, bring your own device, document sharing, use of generative AI, the Information Security Programme, key management and cryptography, network security, passwords, security incident management, server security, software development lifecycle and vulnerability management.
- A dedicated security operations team to monitor, detect and respond to security incidents in line with our cyber security incident management procedures.
- Enhanced data protection solutions have been implemented across consumer facing and internal systems, to guard against the increasing threat of ransomware.
- All employee accounts are protected by multi-factor authentication ('MFA') regardless of device and location, providing enhanced authentication protection.
- Major incident response simulations and business continuity tests carried out periodically.
- System vulnerability and penetration testing carried out regularly by both external and internal resources, including: application vulnerability testing; penetration testing of our platform and infrastructure; and red team testing to ensure our processes for responding to a cyber incident are robust and fit for purpose.
- All aspects of our applications are designed and deployed with security in mind so that Auto Trader can deliver a secure and trusted platform for our customers.

## PROTECTING OUR CUSTOMER AND CONSUMER DATA

At Auto Trader, data is at the heart of everything we do and data compliance and protection are crucial. Our structured framework helps us meet compliance obligations, customer expectations and privacy rights, and mitigate the risk of a data breach. We fully adhere to the Data Protection Act 2018 and UK GDPR for data protection standards.

We have policies and guidelines complying with privacy legislation for collecting and storing personal data of our consumers, customers, and employees. As a data processor for our customers and a data controller for employees' personal data, we are committed to ensuring the personal information we collect is used appropriately, securely, responsibly and transparently according to our privacy notices which govern all our platforms and subsidiaries.

We have dedicated teams responsible for data privacy, breach prevention, reporting, policy compliance, record keeping and data subject rights. We monitor adherence to data privacy laws and address breaches promptly through our assurance framework. Consumer data protection enquiries are managed via a dedicated mailbox.

We hold quarterly GDPR Steering meetings with data owners from all business areas to coordinate communication and guide our ongoing data strategy, and compliance with security and privacy regulations.

All data owners are encouraged to complete Certified GDPR Foundation training to achieve the International Board for IT Governance qualification ('IBITGQ'). Currently, over 80% of data owners are certified. Auto Trader employees, including part-time, contractors and Board members, must complete annual data privacy and information security training. We have established processes for UK GDPR compliance, including Data Protection Impact Assessments ('DPIAs') for identifying and minimising data protection risks in new or changed products or services involving personal data. We maintain records of processing activity ('ROPAs') detailing lawful basis and data retention periods, with bi-annual audits to ensure they remain up to date and accurate. We maintain separate privacy notices for consumers, employees and retailers, which are reviewed and updated regularly. We have processes in place to handle Subject Access Requests ('SAR') and Erasure requests.

Where required, Auto Trader obtains consent to collect personal data to service consumer enquiries about products, services, or vehicles advertised on our marketplace. Separate, explicit consent is obtained to contact consumers for marketing purposes. Where we do pass on personal data, we carefully vet third-party service providers to ensure they are aware of their responsibilities, including the security of personal information, and use it only to fulfil the service they provide on our behalf.

In case of data loss incidents, we follow a rigorous management process, report notifiable breaches promptly to regulatory authorities, and take remedial action swiftly to ensure incidents are fully mitigated.

## FCA COMPLIANCE

Auto Trader Limited, the main trading subsidiary of the Group, is authorised by the FCA for consumer credit and insurance intermediary activities. Our activities primarily relate to providing finance and insurance introductions to consumers for third parties (retailers or commercial partners). We have introduced consumer journeys for some of our regulated activities as part of our digital retailing proposition using the technology of Blue Owl Limited (trading as 'AutoConvert'), a wholly owned subsidiary which is an Appointed Representative of Auto Trader Limited in respect of consumer credit activities.

Autorama UK Limited (trading as 'Vanarama') is authorised by the FCA for consumer credit activities relating to brokering leases to retail and trade customers. Autorama UK Ltd also maintains the required FCA permissions to support a managed exit from providing Guaranteed Asset Protection ('GAP') insurance in accordance with its previous distribution model. We have introduced, and continue to develop, consumer journeys where consumers start their journey on Auto Trader and complete an onward journey with Vanarama.

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We have specialist internal resource within our Governance, Risk and Compliance team across Auto Trader Limited and Autorama UK Limited with significant experience of working in FCA regulated businesses, and we have developed a detailed governance framework to ensure that we comply with the principles, rules and guidance applicable to our activities.

We have a comprehensive suite of policies, training and monitoring procedures to ensure awareness of and compliance with the requirements, including financial promotions, product change management, complaint handling and vulnerable customers. Our Customer Charter outlines our commitment to delivering good outcomes for consumers.

During the year, our compliance monitoring framework has supported us to continue to embed the requirements of the Consumer Duty, whilst also allowing us to keep pace with a period of change in the regulatory landscape that underpins motor finance.

We apply the FCA's Senior Managers & Certification Regime at Auto Trader Limited and Autorama UK Limited. The Auto Trader Leadership Team all take up roles of Senior Managers or Certified Functions at Auto Trader Limited. The Autorama UK Limited Board and other specific members of the Auto Trader Leadership Team make up the Autorama UK Limited Senior Managers population, with a number of non-Auto Trader Leadership Team members taking up roles as Certified Functions. All of these individuals have been assessed and certified as Fit and Proper. All employees are subject to the Conduct Rules and have received appropriate training and guidance.

### BUSINESS ETHICS AND COMPLIANCE

We are committed to operating in a responsible and compliant way. Our governance framework, values, internal policies, processes and controls, training programmes and performance review systems are designed to support a culture of high standards, trust and integrity.

We have zero tolerance for bribery, corruption and financial crime in our business and in dealings with our customers, suppliers and other third parties we engage with. All of our employees, including contractors and Board members, complete annual online training on information security, GDPR, anti-bribery and corruption, tax evasion, anti-money laundering, modern slavery and whistleblowing.

Our Company values put ethical standards at the heart of our day-to-day decision-making and actions. We take all reasonable steps to prevent unethical practices and risks to consumers. We do not work with any service provider, customer, or supplier that does not align with our values.

We have performed a Group-wide review of our counter-fraud and financial crime framework. This involved a refresh of our financial crime risk register and we considered various vectors for financial crimes, such as: where Auto Trader could be the victim of a financial crime; where Auto Trader's systems and platforms could be exploited by criminals to defraud other users of our site; and where employees and/or associated persons could commit financial crimes which might seemingly 'benefit' Auto Trader.

### GRIEVANCE REPORTING OR ESCALATION PROCEDURES

We aim to create a working environment in which all individuals enjoy coming to work, where they can perform at their best, and where they are free from discrimination or harassment.

We foster a culture of open and healthy conversations, mutual appreciation and respect. We do not tolerate any behaviour that undermines this aim. We are committed to a culture where staff can freely report any issue or concern, and access support via the escalation procedures we have in place. Our grievance policy sets out both informal and formal avenues for addressing concerns.

### MAINTAINING A TRUSTED MARKETPLACE

Auto Trader aims to offer a marketplace that is relevant, reliable and fair. We ensure that advertisements shown are accurate and genuine, which is important for both our consumers and customers. Our goal is to deliver a valuable service and an engaging user experience.

#### RETAILER FEEDBACK

We actively gather retailer and consumer feedback to improve our products and services, ensuring market-leading solutions and support to our retailer partners. We monitor consumer sentiment across various products and channels, reviewing thousands of feedback items weekly.

#### PRODUCT RESEARCH AND TESTING

When we bring a product to market, we undertake thorough discovery to ensure solutions meet the varied needs of our retailer partners and consumers. Retailers participate at all stages, including beta testing prior to scaling solutions.

#### SENTIMENT TRACKING

We survey retailers monthly to gather structured feedback on our partnership relationship, satisfaction, value for money, and brand sentiment.

#### VOICE OF THE CUSTOMER

We monitor feedback gathered by our Partnerships community from retailers during inbound and outbound calls each week. This helps us measure retailer sentiment and respond promptly to market challenges they might be facing.

#### CONSUMER SENTIMENT

We maintain very positive feedback scores on Trustpilot (4.7/5 from 99k reviews), iOS App Store (4.8/5 from 274.k reviews), and Android Play Store (4.8/5 from 97.8k reviews).

#### TAG VERIFICATION

We hold the Brand Safety Recognition seal from Trustworthy Accountability Group ('TAG'), the leading programme fighting criminal activity and protecting brand safety in digital advertising. This recognition confirms our compliance with global standards against fraud, malware, and threats to brand safety, acknowledging our efforts to enhance trust and transparency in the industry.

#### VSTAG FORUM

We lead the Vehicle Safe Trading Advisory Group ('VSTAG'), an industry forum we founded in 2006, that includes the UK's top online automotive advertisers and advisors, the Metropolitan Police, Get Safe Online and Action Fraud. Together, we aim to reduce online vehicle crime and protect buyers and sellers of used vehicles from fraud.

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### IMPLEMENTING CONSUMER DUTY

The FCA's Consumer Duty took effect on 31 July 2023, establishing higher standards of consumer protection within financial services. This Duty aligns well with our objectives of enhancing transparency in the car buying process, positioning us favourably to comply with the requirements.

Following the successful execution of our implementation plan, which included collaboration with our internal audit partners to conduct a readiness review in early 2023 and an effectiveness review in March 2024, compliance with the requirements of the Duty are now fully embedded in our policies and procedures.

We are confident in our ongoing compliance with the Duty and are well prepared to continue to meet its requirements and adapt as necessary as the FCA reviews the Duty rules during 2025.

### MODERN SLAVERY

We are committed to preventing slavery and human trafficking in our business and supply chains. We require the highest standards of honesty and integrity in all our business dealings and relationships. We will not tolerate the mistreatment of people in our employment and employed in our supply chain. 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 supply chain. Our Modern Slavery Act statements can be found here: [plc.autotrader.co.uk/media/atufuyrt/at\\_modernslaverypolicy\\_2024.pdf](https://plc.autotrader.co.uk/media/atufuyrt/at_modernslaverypolicy_2024.pdf). During 2025, no incidents of modern slavery or human rights abuse were identified or reported in our business or supply chain.

### HUMAN RIGHTS

Auto Trader is committed to supporting human rights and is opposed to all forms of discrimination in our business activities, relationships and supply chain. We have zero tolerance towards modern slavery, human trafficking, forced or compulsory labour and child labour. Through compliance with national laws and our internal policies, we are committed to supporting human rights and 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 equitable and fair treatment of all persons we come into contact with. All employees are paid above the Real Living Wage. We are an accredited Living Wage Employer. We safeguard our employees through a framework of policies and statements including Modern Slavery, Gender Pay, Flexible Working, Equal Opportunities and Inclusion Policies. All employees receive training to ensure they can identify the different types of modern slavery and the action they can take if they have any concerns.

### WHISTLEBLOWING

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. We actively cultivate a transparent and open culture, encouraging our employees to speak up whenever they have concerns, if they suspect anything inappropriate, or experience any serious malpractice or wrongdoing in our business. We believe this contributes to a fairer and more transparent marketplace where customers and consumers know that we can be trusted. We have an internal reporting facility for employees to discuss concerns and we also operate an anonymous and confidential whistleblowing helpline through an independent organisation. Reports are directed to the Audit Committee Chair and the Company Secretary or via an independent hotline.

### TAX TRANSPARENCY

Auto Trader is committed to being a responsible taxpayer. We ensure responsible tax management with a strong controls culture, governance, and well-defined processes and controls. The Audit Committee oversees our tax-related risks within the Group's governance framework, with our tax policy being reviewed and approved annually. Our processes and controls are designed to ensure accuracy in the Group's tax filings, minimising the potential for errors. We recognise the role that tax plays in supporting wider society, contributing to the funding of public services and infrastructure that benefit communities and the economy. We are committed to fulfilling our tax obligations responsibly and paying the appropriate amount of tax at the right time in accordance with relevant legislation. In 2025 our total tax contribution was £230.2m (2024: £213.9m). Taxes borne by the Group totalled £105.9m (2024: £100.9m), made up of corporation tax, employer's NICs and stamp duty. Taxes collected by the Group totalled £124.3m (2024: £113.0m), comprised of PAYE deductions, employees' NICs and net VAT collected. Our full tax strategy (approved by the Audit Committee on 5 February 2025) is available at: [plc.autotrader.co.uk/media/m4vdqotp/at\\_group taxpolicy2025.pdf](https://plc.autotrader.co.uk/media/m4vdqotp/at_group taxpolicy2025.pdf).

### PAYMENT PRACTICES REPORTING

We publish information about our supplier payment practices and performance. On average, Auto Trader takes 36 days (2024: 36 days) to pay our supplier invoices, with 98% (2024: 99%) paid within agreed terms during the reporting period.

### SUPPLIER ESG ENGAGEMENT

We hold ourselves and our suppliers to the highest standards of behaviour. We want to engage suppliers that share our values and collaborate with them to build a stronger, more responsible supply chain.

We have an established supplier engagement strategy and the information we collect through our supplier engagement/onboarding process, complemented with our Ethical Procurement Questionnaires, provides us with greater insight into numerous aspects of our suppliers' performance, including their ESG practices.

As part of our environmental strategy, we have expanded our discussions on sustainability with those suppliers who account for our highest carbon emissions to deep dive into understanding where our suppliers are on their own sustainability journey. Additionally, this year we have launched our own internal Supplier Sustainability Ratings, which use simple criteria to establish which of our suppliers are at the beginning of their sustainability journeys and which are advanced and a leader in terms of targets, actions, initiatives and reducing their own emissions. We have published a Supplier Code of Conduct which outlines Auto Trader's stance on important matters and our expectations of our suppliers.

#### FURTHER INFORMATION

To find out more about all of our governance & compliance policies, please go online:

[plc.autotrader.co.uk/esg/policies-reports](https://plc.autotrader.co.uk/esg/policies-reports)

To find out more about how we are protecting our customer and consumer data, please go online:

[autotrader.co.uk/privacy-notice](https://autotrader.co.uk/privacy-notice)

[plc.autotrader.co.uk/privacy-cookies](https://plc.autotrader.co.uk/privacy-cookies)

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