



Auto Trader Group plc Statement on Modern Slavery Act

 **AutoTrader**

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Introduction

The UK Modern Slavery Act requires large commercial organisations operating in the UK to publish a slavery and human trafficking statement. This statement is made on behalf of Auto Trader Group plc and Auto Trader Limited in accordance with Section 54(1) of the Modern Slavery Act 2015 in relation to the financial year ended 31 March 2019.

Our business

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

Auto Trader Group plc is the group holding company, with subsidiary undertakings in the UK and Ireland. Auto Trader listed on the London Stock Exchange in March 2015 and is a member of the FTSE100 Index.

We have approximately 800 employees and annual revenues of approximately £350m, all generated from customers in the UK and Ireland.

We have three main revenue streams:

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

We also operate a similar business in Ireland through our website carzone.ie.

Modern slavery is a crime and a violation of fundamental human rights



Our policy on slavery and human trafficking

Modern slavery is a crime and a violation of fundamental human rights.

It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We recognise the importance of the Modern Slavery Act in combating the human rights abuses comprised in modern slavery.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships; and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from our contractors, suppliers and other business partners.

Our supply chains

Due to the nature of our business we assess that there is a low risk of Modern Slavery in our business and supply chains.

We engage with suppliers who provide the following services:

- **Direct costs of sale:** freelance photography, external image services, domain name and email services, an outsourced call centre and direct costs for various online products and services;
- **Technology costs:** information technology infrastructure, hardware providers, software suppliers, public cloud services; outsourced data centre services and data feeds;
- **Marketing costs:** online, print and television media and advertising services, marketing and PR consultancy services and market research;
- **People costs:** recruitment and talent search services, training and development costs, staff travel, accommodation and entertainment; and
- **Overheads:** accountants, audit and legal advisers, banking services, payment service providers, credit checks and collection costs, building maintenance, office equipment, stationery supplies, cleaning and catering services.

We are undertaking the following steps to combat slavery and human trafficking:

Risk assessment and management

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

Due Diligence Processes

- Our zero-tolerance approach to modern slavery is communicated to key suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- Suppliers deemed high risk will be required to respond to a standard due diligence questionnaire that incorporates questions on modern slavery and their associated policies and procedures. All suppliers are made aware of our zero tolerance of modern slavery and have been asked to confirm their compliance with the Modern Slavery Act 2015.
- As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Training for staff

- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
- All staff have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in such way that the opportunity and incidence of modern slavery is prevented.
- Employees are required to complete compliance training as part of their induction training and on an annual basis covering a range of compliance matters, including their obligation under the Modern Slavery Act
- Through our whistleblowing service, staff are encouraged to report any suspected activity that might lead to a breach of our policy in any parts of our business or supply chains of any supplier at the earliest possible stage.

Measuring effectiveness

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

- **Employee training**

- We've introduced training for all Auto Trader employees to raise awareness about Modern Slavery. We will monitor the completion of this training annually.

- **Contracts**

- We've introduced due diligence questionnaires for higher risk suppliers and we will monitor the effectiveness of this.

- **Reports**

- We monitor reports of concerns raised re modern slavery; this includes any concerns raised via our Whistleblowing framework.

- To date we have received no reports.

Future activity

- Provide additional training for employees involved in engaging suppliers to improve knowledge and awareness around due diligence.
- Raise awareness of modern slavery with our employees, including projects and initiatives to improve awareness and knowledge.
- Take steps to develop information and communications about our policies and procedures.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Groups slavery and human trafficking statement for the financial year ending 31 March 2019.

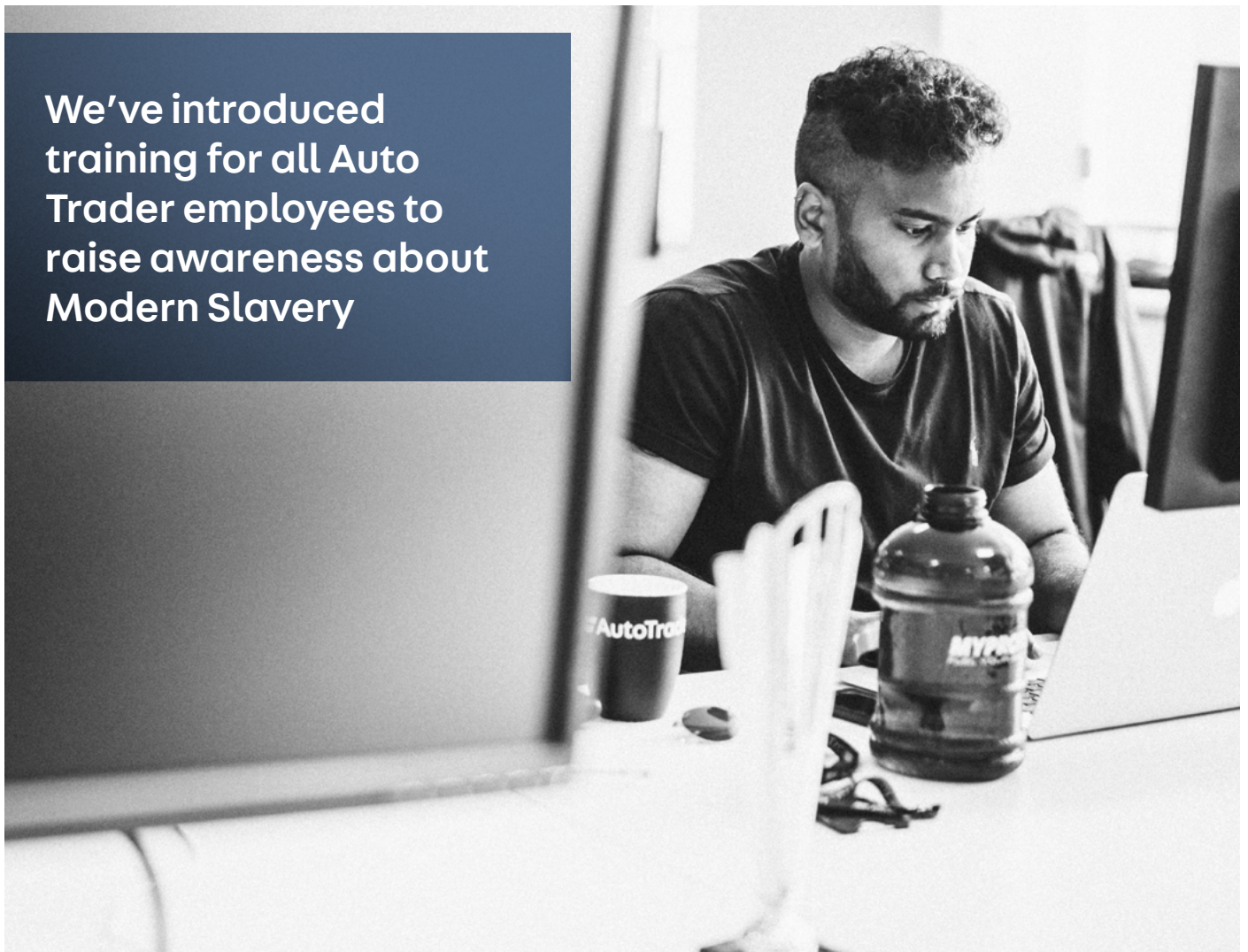
Approved by the Board on 19 September 2019 and signed on its behalf by Nathan Coe.

Director

Auto Trader Group PLC

Auto Trader Limited

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