



Auto Trader Group PLC

Statement on Modern Slavery Act

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Introduction

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

This Modern Slavery statement has been prepared in accordance with Section 54(1) of the Modern Slavery Act 2015 (the Act) in relation to the financial year ended 31 March 2025 and sets out the steps taken by Auto Trader Group plc and subsidiary undertakings (together 'the Group' or 'Autotrader') to the extent that they are in scope of the Act (Auto Trader Ltd and Autorama UK Ltd) during financial year 1 April 2025 to 31 March 2026 to deal with modern slavery risks within our business and supply chains.

This is our tenth statement; previous statements can be seen [here](#).

Our policy on slavery and human trafficking

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

Autotrader has not found any instances of modern slavery violations within its business operations or supply chain within the last year. If a violation were to be found, we have an established process to investigate, remedy, mitigate, and take action.

We are committed to human and employees' rights and are supportive of the UK Government's objective of eradicating modern slavery and human trafficking.

Our business

Autotrader's purpose is to 'Drive Change Together. Responsibly'. Our actions and policies to deal with modern slavery risks are part of our wider procurement and corporate social responsibility goals which help us achieve this purpose. We aim to grow both our car buying and selling audiences, thereby strengthening our core advertising business. We will change how the UK shops for vehicles by providing the best online car buying experience and enabling all retailers to sell online. We aim to build stronger partnerships with our customers, use our voice and influence to drive more environmentally friendly vehicle choices, and create a diverse and inclusive culture.

Group structure

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

ESG statement

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

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

Our Corporate Responsibility Committee is responsible for providing oversight, scrutiny and challenge on matters relating to the Group's ESG strategy., which includes oversight of the Group's Modern Slavery policies. The Executive Directors are responsible for the implementation of Modern Slavery policies and for responding to violations, should they occur.

You can view further information [here](#).

Our people

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

Within Autotrader, we have approximately 1,300 employees based in the UK. Autotrader is an equal opportunities employer and committed to fair and equal treatment in recruitment and employment matters. We recruit in line with our policies and values and have processes in place to mitigate any risk for internal and external recruitment. All recruits are verified for the right to work in the UK. Documentation is obtained and reviewed prior to the employee starting with Autotrader to mitigate the risk of any human rights violations.

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

Employees

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

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

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

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

Our supply chains

Autotrader is a digital services provider, and we are confident that there is a low risk of modern slavery in our own business as well as in our supply chains.

Our operations are entirely based in the UK. We have identified the suppliers we believe could have a heightened risk of modern slavery, we analyse our supply chain mapping the geo location, contractual status, the industry/commodity type, and level of spend against mitigations, such as published statements, reports, measures the supplier has in place and any contractual clauses, SLA/KPIs are in place.

Through our supply chain analysis, we have identified twenty Tier 1 suppliers, those from whom Autotrader purchases directly, as presenting an elevated risk of modern slavery. Of these, sixteen are located in the UK, three in the USA, and one in Denmark.

We will review and monitor these companies, as well as continuing to map the extent of our operations and supply chain.

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

- Catering, cleaning, office refurbishment works, which require the direct provision of labour
- Venues and regular use hotels, where the hire of casual labour could occur
- IT equipment and furniture, where modern slavery could occur in the manufacturing process or the supply of raw materials and component parts.

Autotrader assesses all new suppliers who may represent a risk of modern slavery. We utilise structured questionnaires, monitor supplier relationships, and carry out periodic checks related to the level of risk. Further information on our assessment process is included below.

We engage with suppliers who provide the following services:

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

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

Risk assessment and management

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

Due diligence processes

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

Training for staff

- All staff have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in such a way that the opportunity and incidence of modern slavery is prevented.
- All employees are required to complete mandatory compliance training as part of their induction training and on an annual basis covering a range of compliance matters, including their obligations under the Modern Slavery Act. During the last financial year, ending March 2025 98% of employees have completed training to improve their knowledge and awareness of modern slavery.
- All members of our procurement team undertake additional ethics training via the Chartered Institute of Procurement and Supply which has more specific modern slavery principles relating to procurement and supply chain activities, this is undertaken once per annum.
- Employees are also trained on the use of our Whistleblowing Policy; employees are encouraged to report any suspected activity that might lead to a breach of our policy in any parts of our business or supply chains of any supplier at the earliest possible stage.

Measuring effectiveness

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

- governance and Due Diligence, including any cases identified;
- procurement and Supply Chain; and
- employee training and education.

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

Contracts

As part of our procurement process, we continue to monitor higher risk suppliers, via a combination of due diligence questionnaires, and market insight systems. Our Autotrader Supplier Code of Conduct is published externally and shared with existing and new suppliers.

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

Reporting Concerns

We monitor reports or concerns raised regarding modern slavery; this includes any concerns raised via our whistleblowing process. Our Whistleblowing policy is reviewed annually, and we provide employees with a clear process that allows them to raise concerns about business activities including slavery and human trafficking.

During the year we have expanded our whistleblowing service to enable anonymised reports to be made by third parties. There have been no such reports this year.

We offer various methods to raise concerns, including:

- emailing procurement@autotrader.co.uk; and
- reporting via our independent Whistleblowing service.

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

You can find further information regarding our commitments to working responsibly in our [Annual Report](#).

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

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

- investigation;
- escalation to senior stakeholders or appropriate authorities;
- remediation to any victims;
- plans to mitigate future harm;
taking immediate action including issuing notice to stop work, breach of contract or termination of contract, if we conclude that there has been a modern slavery incident;
and
ongoing monitoring and periodic review.

Industry collaboration

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

Progress

FY24/25 Aims	Progress
Continue to raise awareness for employees involved in engaging suppliers or	All members of the Procurement team annually complete an Ethics Test issued by their professional body (Chartered Institute of Procurement & Supply).
Maintaining our accreditation as a Living Wage employer	We have continued to achieve accreditation.
Raise awareness of modern slavery with our employees	Training completed by 98% of all employees.
Implement a scorecard to monitor performance against key indicators.	We have started this process, but this remains a work in progress and subject to development.
Take steps to develop information and communications about our policies and procedures, including adding our statements to the Government Modern Slavery statement registry.	We have added our statement to the Government Modern Slavery statement registry.

Additional activities

In addition to the above aims we have made additional progress this year, including:

- the implementation of a new market leading solution which helps identification and calculation of risks, as well as providing an adverse media scanning service, which can help identify modern slavery violations when they are reported in the press. This enhances our existing supplier due diligence and supply chain insight; and
- updated and published a new supplier code of conduct that includes a grievance mechanism for suppliers and employees of suppliers to report modern slavery or human rights violations to Autotrader or the appropriate authorities.

Future activity

Continue to improve our modern slavery CCLA assessment and reporting to provide better insights for any risk areas.

Adhering to procurement procedures when procuring goods or services from external suppliers.

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

- maintaining our accreditation as a Living Wage employer;
- raising awareness of modern slavery with our employees, including projects and initiatives to improve awareness and knowledge;
- developing a scorecard to monitor performance against agreed key indicators; and
- adding new statements to the Government Modern Slavery statement registry.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2025.

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

Approved by the Board on 18.09.2025 and signed on its behalf by

Nathan Coe

Chief Executive Officer.



Auto Trader Group PLC

Auto Trader Limited

Autorama UK Limited