Autotrader Group Plc

Statement on Modern Slavery Act

Autotrader

Updated: 22/09/2026

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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 2026 and sets out the steps taken by Autotrader Group plc and subsidiary undertakings (together 'the Group' or 'Autotrader') to the extent that they are in scope of the Act (Autotrader Ltd and Autotrader Leasing 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 modern slavery and human rights

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.

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

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 act.

Responsibility

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.

The Company uses advanced data science, artificial intelligence and scalable technology to improve how vehicles are bought and sold, while building stronger partnerships with our customers and the wider automotive ecosystem. Autotrader's platform leverages significant amounts of proprietary data and machine learning models to power pricing, demand forecasting and personalised consumer experiences. These capabilities enable retailers and manufacturers to make better decisions, improve performance and respond to real-time market dynamics. Autotrader is increasingly digitising the car buying journey, from search and discovery through to financing and purchase, enabling more of the buying journey to take place online. Alongside this, we are using our data and influence to support the transition to electric vehicles. This is all underpinned by a values-led culture that empowers our people to develop and perform, enabling continuous innovation across our platform and products.

Our direct operations focus on digital marketplace services, software solutions, and transactional tools connecting buyers, dealers, and manufacturers. Our direct operations are wholly located in the UK.

Our downstream value chain includes retailers, manufacturers and private sellers. We also have partnerships with finance and insurance providers/brokers. Our downstream value chain is predominantly located in the UK, with limited exposure to high risk geographies.

Group structure

Autotrader Group plc is the Group holding Company, with subsidiary undertakings all located in the UK. Our business is operated primarily through three trading subsidiary undertakings in the UK, as detailed in the **Annual Report and Accounts**.

The Group also has a 49% holding in a joint venture in the UK that operates a digital business-to-business (B2B) trade auction platform.

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 over the long term.

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.

Governance is a key component 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 approach to modern slavery and its Modern Slavery policies. The Executive Directors are responsible for reviewing our approach to modern slavery and the implementation of modern slavery policies and for responding to violations, should they occur. They delegate these duties to our Director of Governance through the risk and compliance, procurement, recruitment and people teams on a day-to-day basis.

We have also established our Responsible Change Forum, which brings together senior stakeholders from across Autotrader to shape and oversee our ESG strategy and initiatives, including the Group's Modern Slavery policies and approach. It aligns priorities, drives progress and helps embed ESG considerations across the business.

To ensure our modern slavery response remains proactive and effective, operational performance is monitored quarterly by our Director of Governance, with any high-risk flags or whistleblowing reports escalated immediately. Evaluation of our modern slavery strategy and due diligence outcomes is formally conducted annually at Board level, where executive directors and non-executive directors review progress, approve the statutory statement, and allocate resources to emerging risk areas.

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 continue to evolve our culture, with a clear focus on accelerating performance and supporting an environment where everyone feels empowered to be themselves, challenge boundaries and go further, faster – together.

Within Autotrader, we employ approximately 1,200+ employees based in the UK. We recognise that migrant and contract workers across industries are disproportionately at risk of modern slavery and human trafficking. To directly mitigate this operational risk within our business, we maintain a responsible, transparent employment model.

Our UK workforce is employed on open-ended contracts providing guaranteed working hours, stable income, and full access to statutory rights, holiday pay, and health benefits, whether full-time or part-time, and permanent or interim. We strictly avoid the use of zero-hours or casual contracts for core operations. Where contingent, temporary, or specialist contractor roles are required, we engage exclusively with reputable UK recruitment agencies who align with our Supplier Code of Conduct and anti-slavery principles.

We are an equal opportunities employer committed to fair and equal treatment across all recruitment and employment matters. We have an in-house recruitment team who directly carry out the majority of our recruitment. In specific circumstances, e.g. specialist technical roles, executive recruitment, an external agency may be engaged.

We recruit strictly in accordance with our internal policies and core values, maintaining robust processes to eliminate bias and mitigate risk across both internal and external recruitment. To protect candidate rights and mitigate human rights risks, all recruits are verified for the right to work in the UK prior to their start date. Furthermore, we commit to the Employer Pays Principle in our recruitment practices, absorbing all recruitment costs and expenses so that no applicant ever pays to secure employment with Autotrader.

In our direct operations, all workers are based in the UK. Our employee base is made up of c.80% office based staff and c.20% remote-based employees, all in the UK. Our offices provide a modern working environment, increased space for collaboration, catering facilities, enhanced technology and strong environmental credentials. To support our remote-based 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.

In our direct operations 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 safeguard our employees through a framework of policies and statements including Modern Slavery, Gender, Ethnicity & Disability 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 eligible 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. The main products and services that we source from our suppliers include:

- Office Building and Relocation Services - managed primarily via our preferred contractor as part of Autotrader's move to a new headquarters in January 2026

- Facilities - services delivered to our Manchester office including, cleaning, catering and security
- Professional Services - typically marketing, advertising (digital and traditional media), audit, legal services, often completed within the supplier's own offices
- Technology - a combination of digital services, software and hardware, sourced via large professional resellers, data sets which complement Autotrader's extensive vehicle and market knowledge
- Vehicle Retailers - the supply of passenger and commercial vehicles either directly from a UK based Manufacturer or a Vehicle retailer
- People costs - recruitment and talent search services, training and development costs, staff travel, accommodation, and entertainment
- Direct costs of sale - domain name and email services and direct costs for various online products and services

Of these, we believe the following type of suppliers represent our most salient modern slavery risks:

- Catering, cleaning, security and office refurbishment works, which require the direct provision of labour
- Venues and regular use hotels, where the hire of casual labour could occur
- Manufactured goods, such as IT equipment, furniture, and vehicles purchased and re-sold via our Autotrader Leasing business, where modern slavery could occur in the manufacturing process or the supply of raw materials and component parts

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

91% of our total annual spend is through 111 tier 1 suppliers, who we spend £100,000 or more with each. The geographic location of these active tier 1 suppliers is:

Country / Location	Number of suppliers
United Kingdom	98
Ireland	6
USA	6
Netherlands	1

We have identified 34 UK based suppliers we believe could have a heightened risk of modern slavery by analysing our supply chain, mapping the geolocation, contractual status, the industry/commodity type, and level of spend. We assess mitigations, such as published statements, reports, measures the supplier has in place and any contractual clauses, SLA/KPIs are in place.

We have improved our knowledge of our supply chain by now also identifying the ultimate owners and where they are head-quartered as part of our assessment: 19 of these are owned or operated by UK based businesses, 9 of these businesses are owned by or head-quartered in Europe, 7 in the USA and 1 in Israel. We continue to review and monitor these companies and any new companies we feel are a higher risk, as well as continuing to map the extent of our operations and supply chain.

Our downstream value chain

Our downstream value chain includes retailers, manufacturers and private sellers. We also have partnerships with finance and insurance providers/brokers. Our downstream value chain is predominantly located in the UK, with limited exposure to high-risk geographies. The Group also has a 49% holding in a joint venture that operates a digital business-to-business (B2B) trade auction platform.

While the formal reporting boundary under Section 54 of the Modern Slavery Act 2015 focuses primarily on an organisation's direct operations and upstream supply chain, Autotrader recognises that operating a digital marketplace gives us a wider responsibility to consider modern slavery risks across our broader downstream ecosystem. As a platform connecting automotive retailers, private sellers, and car buyers, we are committed to maintaining a safe and responsible trading environment. To manage downstream risks, we enforce identity verification procedures across all retailer customers - including non-contract accounts - prior to platform access. Our customer terms and conditions require compliance with all relevant legal and regulatory obligations, and we maintain an active risk watch-list process; any substantiated allegations or evidence of modern slavery involvement can result in the immediate termination of our business relationship. Furthermore, our employee training incorporates awareness of modern slavery risks, and we extend access to our independent whistleblowing reporting lines to both suppliers and commercial customers to ensure concerns can be raised securely and investigated.

Steps we take 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 may 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

Procurement processes

- 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**.

- As part of the supplier onboarding process, the **Autotrader Supplier Code of Conduct** is shared with suppliers and they are required to confirm that they have read and accept the terms of the Code. Our Supplier Code of Conduct outlines our expectations of all suppliers including (but not limited to) complying with the Modern Slavery Act 2015 and supporting the protection of human rights and provision of a healthy and safe work environment.

- In the event of a breach of modern slavery law, the supplier must outline the process they have followed, to include; where the breach was found, the steps the supplier has taken to end, mitigate ongoing risks and provide an appropriate remedy process to the victims. The supplier also commits to provide an appropriate grievance mechanism(s), either its own, a third party or shared, available to all workers in its operations and its supply chain to raise human rights related concerns (including labour conditions) without retaliation.

Training for staff

We have targeted internal training that focuses on training staff on our policy, how to spot indicators of modern slavery and establishing clear pathways to escalate concerns:

- 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 2026, 99% of employees have completed training to improve their knowledge and awareness of modern slavery.

- All members of our central 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 our Whistleblowing Policy; this training ensures employees understand how to identify, report, and escalate concerns regarding unethical, illegal, or improper conduct within the business; 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

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.

Our whistleblowing service also enables 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**.

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.

KPI	Quantity
No. of incidents and investigations	Nil
Tier one suppliers identified and assessed	34
High risk suppliers	7
% of employees who have completed the modern slavery compliance training	99%

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

Remediation processes

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

FY26 Aims	Progress
Continue to raise awareness for employees involved in engaging suppliers or conducting contract negotiations.	All members of the central 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 99% of all employees.
Develop a scorecard to monitor performance against key indicators.	Embedded the Dun & Bradstreet's Risk Analyst solution to identify and monitor risk, as well as providing an adverse media scanning service, which can help identify modern slavery violations when they are reported in the press. This has enhanced our supplier due diligence and insight. Developed a KPI scorecard and relevant KPIs have been included in this report. These are monitored by the relevant leadership team.
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 updated our supplier code of conduct and third party risk management policy. We published a revised supplier code of conduct that documents a grievance mechanism for suppliers and employees of suppliers to report modern slavery or human rights violations to the appropriate authorities and inform Autotrader. We have added our statement to the Government Modern Slavery statement registry.

Future activity

We will continue to carry out activities in relation to training, supplier due diligence and raising awareness across the business. We are also upgrading our supplier tools and processes so it's easier to track vendor risks and collect the required background checks.

We plan to do a full assessment of our downstream activities to further understand risks in this area.

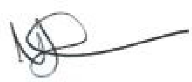
We will continue to investigate and implement new tools and solutions which may help with pro-active identification of modern slavery incidents and streamline our monitoring and compliance data capturing through Artificial Intelligence and more automated solutions. Any new tool, including one using Artificial Intelligence, will support rather than replace risk-based judgement, supplier engagement and human review.

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

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 2026.

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

Approved by the Board on [17 September 2026] and signed on its behalf by Nathan Coe- Chief Executive Officer on [17 September 2026].



Nathan Coe

Autotrader Group plc and subsidiary companies (Autotrader Limited and Autotrader Leasing Limited)