

Working responsibly continued



Our governance & compliance

Uphold the values of good corporate governance and risk management, underpinned by robust and effective policies.

OVERVIEW

We are dedicated to conducting business ethically. Strong governance forms the foundation of each of our ESG pillars, ensuring responsible decision-making, effective risk management, and a culture of integrity among our people in everything we do. We embed high standards across our business through a comprehensive compliance framework, which encompasses robust policies, procedures, guidance, and training. As an online marketplace, the security of our cyber infrastructure and the protection of data are central to sustaining customer trust, particularly as we transition further into digital retailing. Our systems are continuously updated to reflect our changing business priorities. In 2026, we achieved full compliance with the UK Corporate Governance Code 2024. Further information on our Board governance structure can be found in the Governance section from page 53.

CYBER SECURITY

Trust is fundamental to our business. We therefore place strong emphasis on protecting our services against cybercrime and fraud. The cyber threat landscape continues to evolve, and as AI models become more sophisticated, there is an increasing risk that they may be exploited by bad actors. A material cyber breach could result in reputational damage, financial loss or regulatory sanctions. The risk of a cyber attack is considered in our viability scenarios (see page 52).

While cybersecurity risks cannot be fully eliminated, we mitigate their likelihood and impact through a comprehensive security programme overseen by our Chief Technology Officer. Guided by the NIST Cybersecurity Framework ('CSF'), we set clear maturity targets and use a security-by-design approach to product development.

Our 'defence in depth' strategy incorporates multi-factor authentication, least-privilege access controls, and continuous application testing across our corporate systems and the Autotrader platform. To ensure accountability, risks are monitored year-round by the Executive team and Risk Forum, with formal updates provided to the Board at least annually.

We validate our resilience through regular internal audits and annual red team testing to ensure our defences remain robust against evolving threats.

Policies and procedures

We have robust measures to detect and respond to cyber threats, including:

- A comprehensive Cyber Security Programme defining scope and roles for leadership, forums and employees.
- Awareness initiatives to educate staff on risks.
- Key policies covering acceptable use, asset management, access control, bring your own device, document sharing, generative AI, information security, key management, network security, passwords, incident management, server security, development lifecycle and vulnerability management.
- A dedicated security operations team monitoring and managing incidents in line with our cyber security incident management procedures.
- Advanced data protection across systems to counter ransomware.
- Multi-factor authentication protects all employee accounts.
- Regular incident simulations, business continuity testing, vulnerability assessments, and penetration tests (application, platform, infrastructure, red team).
- Security is prioritised in every aspect of our applications to ensure a trusted platform for customers and consumers.

PROTECTING OUR CUSTOMER AND CONSUMER DATA

At Autotrader, data compliance and protection are central to our operations. We strictly follow the Data Protection Act 2018 and UK GDPR, with policies in place for secure and responsible handling of personal data. This year, we have also updated our internal processes to reflect the changes introduced under the Data Use and Access Act 2025, ensuring our approach to data handling and governance remains aligned with the evolving regulatory framework. As a data controller for customer and employee data, and a data processor for customer data in some scenarios, we ensure transparent use governed by privacy notices across all platforms.

Dedicated teams oversee data privacy, breach prevention, reporting, compliance and subject rights. Adherence to regulations is monitored through our assurance framework, with consumer enquiries managed via a dedicated mailbox.

The Data Protection team regularly meets with each Data Owner to support them in managing their responsibilities, maintaining oversight of their data assets, and ensuring ongoing compliance with data protection and security requirements. In addition, a quarterly Compliance Steering Group reviews emerging risks and provides coordinated governance across the business. Our processes include Data Protection Impact Assessments ('DPIAs'), maintaining Records of Processing Activity ('ROPAs'), bi-annual audits, regular privacy notice updates, and procedures for Subject Access Requests ('SARs') and erasure requests. Consent is obtained for collecting personal data and marketing contact, and third-party providers are vetted for security of personal information. 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.

Working responsibly continued

Maintaining a trusted and transparent marketplace underpinned by robust policies and compliance

Autotrader 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.

Customers

Retailer feedback

We actively gather retailer feedback to enhance our products and services, supporting market-leading solutions for our retailer partners. Customer advisory groups have been launched to provide direct input into the product development roadmap.

Retailer 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 weekly retailer feedback gathered by the Partnerships community to assess sentiment and respond promptly to market issues.

Consumers

Consumer research

We operate a dedicated user research capability within Product & Technology to inform product development and improve customer experience through data-led insight.

Test-and-learn cycle

Throughout the product development cycle, we adopt a test-and-learn approach, using surveys, user interviews, diary studies, usability testing and eye-tracking. This is complemented by A/B testing, ensuring continual learning and iteration.

Consumer reviews

We maintain strong feedback scores across Trustpilot, iOS App Store and Android Play Store. Regular consumer pulse surveys track brand health and consumer sentiment towards Autotrader.

Our marketplace

TAG VERIFICATION

VSTAG FORUM

CONSUMER DUTY

FCA COMPLIANCE

GDPR



Working responsibly continued

FCA COMPLIANCE

Autotrader Limited, the main trading subsidiary of the Group, is authorised by the FCA to conduct consumer credit and insurance intermediary activities, mainly facilitating finance and insurance introductions for third parties. It uses Blue Owl Limited's technology (trading as 'AutoConvert') to enhance digital retail journeys, with Blue Owl acting as an Appointed Representative for consumer credit. Autotrader Leasing Limited (trading as 'Vanarama') is FCA-approved for brokering leases and continues to develop consumer journeys starting on Autotrader.co.uk and ending with Autotrader Leasing.

We have experienced Governance, Risk, and Compliance teams, robust governance frameworks, and comprehensive policies, training and monitoring to ensure FCA compliance – including financial promotions, product changes, complaints and vulnerable customer support. Our Customer Charter commits to delivering positive outcomes. Our compliance monitoring supports Consumer Duty requirements amid regulatory changes in motor finance. We apply the FCA's Senior Managers & Certification Regime at both Autotrader Limited and Autotrader Leasing Limited, with the relevant ALT and Board members assessed as Fit and Proper.

BUSINESS ETHICS AND COMPLIANCE

We operate to high standards of trust and integrity, underpinned by our governance framework, values, policies and training. The Group has a clear top-level commitment to preventing bribery, corruption and financial crime, with all employees, contractors and Board members required to complete annual ethics and compliance training.

Our values guide ethical decision-making and we work only with partners who share these principles. We continuously review and strengthen our policies, procedures, and controls. For example, over the last year we have benchmarked our arrangements against new laws & regulations such as the Digital Markets, Consumers, and Competition Act, the Online

Safety Act, the Economic Crime and Corporate Transparency Act and Provision 29. We are also reviewing our governance arrangements to capture emerging risks and opportunities surrounding AI, and have refreshed our complaints management process which aims to use customer and consumer feedback to inform future product development and process improvements. We publish information about our supplier payment practices and performance. On average, Autotrader takes 35 days (2025: 36 days) to pay our supplier invoices, with 97% (2025: 98%) paid within agreed terms during the reporting period.

GRIEVANCE REPORTING OR ESCALATION PROCEDURES

We strive to provide a welcoming workplace where everyone can perform well and is treated fairly. We encourage open dialogue and mutual respect, and do not tolerate discrimination or harassment. Staff are free to report concerns and access support through our escalation procedures, with both informal and formal options outlined in our grievance policy.

MODERN SLAVERY

Autotrader 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. We are an accredited Living Wage Employer and 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. Our Modern Slavery Act statements



can be found here https://plc.autotrader.co.uk/media/m0pl2qce/_modern-slavery-act-updated-1912.pdf. During 2026, no incidents of modern slavery or human rights abuse were identified or reported in our business or supply chain.

WHISTLEBLOWING

We actively cultivate a transparent and open culture, and our whistleblowing policy encourages employees to raise any concerns about illegal or improper behaviour without fear of victimisation, discrimination or disadvantage. 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 for employees, customers and suppliers. Reports are directed to the Audit Committee Chair and the Company Secretary or via an independent hotline. No whistleblowing reports have been received in the year.

TAX TRANSPARENCY

Autotrader maintains responsible tax practices through strong controls, clear processes and effective governance overseen by the Audit Committee. Our tax policy is reviewed annually

to ensure compliance and accuracy in filings. In 2026, our total tax contribution was £233.5m (2025: £230.2m), with £107.9m borne by the Group and £125.6m collected. We recognise tax supports public services and infrastructure, and we pay the correct taxes promptly as required by law. For full details, see our tax strategy at https://plc.autotrader.co.uk/media/vl4fcqqu/at_grouptaxpolicy2026.pdf.

FURTHER INFORMATION

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

plc.autotrader.co.uk/esg/policies-reports

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

plc.autotrader.co.uk/privacy-notice

plc.autotrader.co.uk/privacy-cookies