

Working responsibly

Driving positive change

Working responsibly is central to our purpose and strategy. We are committed to doing business the right way, acting with integrity, and measuring and reporting transparently to drive meaningful change across the industry.

Our ESG strategy focuses on the issues most material to our business whilst considering the expectations of our stakeholders. It reflects our wider impacts beyond financial performance, considering the environment, our people and society, and strong/effective governance. Our ESG activity is focused

on doing business responsibly and, as the UK's largest automotive platform, helping to create a more accessible, equitable and sustainable future over the long term.

We track progress through our cultural KPIs (see page 19).

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



P28 The environment [Q](#)

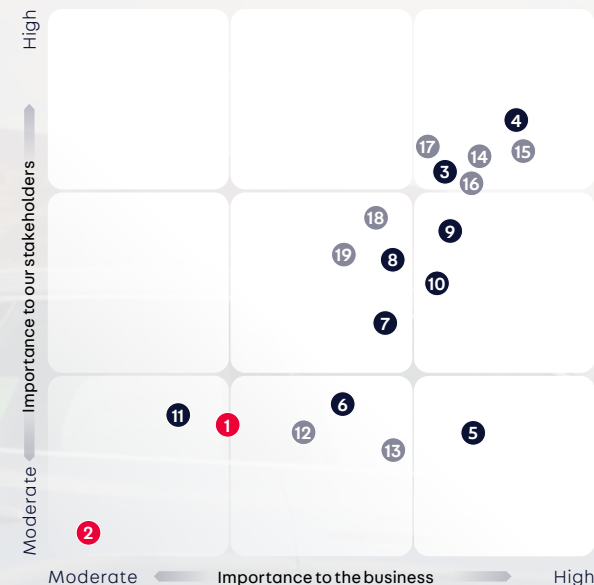
P35 Our people & communities [Q](#)

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Our materiality assessment

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. Our most recent materiality assessment was conducted in 2025, taking a financial materiality approach to our assessment.

ESG factors of material importance to our business were identified and assessed, 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 Autotrader.



OUR MATERIAL ESG ISSUES

THE ENVIRONMENT

- 1 Reducing our environmental impact
- 2 Biodiversity

OUR PEOPLE & COMMUNITIES

- 3 Customer satisfaction
- 4 Driving trust and transparency
- 5 Diversity and inclusion
- 6 Community impact
- 7 Human rights and labour practices in our supply chain
- 8 Investment in talent
- 9 Health, safety and wellbeing
- 10 Workplace culture and employee engagement
- 11 Government affairs and lobbying

OUR GOVERNANCE & COMPLIANCE

- 12 Artificial intelligence in the digital workplace
- 13 Artificial intelligence in products
- 14 Data privacy
- 15 Digital infrastructure and cyber security
- 16 Ethics, integrity and business conduct
- 17 Compliance with legislation, regulations and codes of practice
- 18 Corporate governance
- 19 Risk management

Want to know how we define each material issue? Head online: plc.autotrader.co.uk/esg

Working responsibly continued



The environment

OUR AMBITION

Minimise our environmental impact to protect our business from climate change.

FOCUS AREAS

- Measuring and reducing our GHG emissions, aiming to be net zero by 2040.
- Using our capabilities and voice to influence industry and Government in the transition towards a low-carbon economy.
- Supporting consumers to make more environmentally friendly vehicle choices.

SUPPORTING THE UN SDGs MOST RELEVANT TO OUR STRATEGY



657

tonnes carbon removals purchased this year

451

organisations trained in Carbon Literacy

CLIMATE TRANSITION PLAN
Our Climate Transition Plan sets out our strategic ambition and action we are taking to transition to a low carbon economy.



plc.autotrader.co.uk/esg/the-environment



Our people & communities

OUR AMBITION

Be a responsible employer and maintain a strong, purpose-led culture.

FOCUS AREAS

- Being an inclusive workplace that builds diverse and inclusive teams.
- Supporting employee health and wellbeing and cultivating an engaged, skilled and rewarded workforce.
- Partnering with charities, community groups and industry bodies to support the communities where we work and live and empowering our employees to support causes they care about.

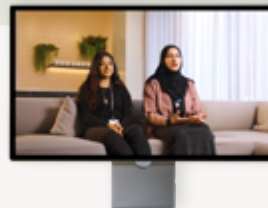
SUPPORTING THE UN SDGs MOST RELEVANT TO OUR STRATEGY



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

Digital inclusion

Partnering with the Good Things Foundation and Greater Manchester Combined Authority to tackle digital exclusion



PROMOTING DIVERSITY IN THE WORKPLACE
We continue to build a diverse and inclusive culture at every level of the Company, with particular focus on leadership.

plc.autotrader.co.uk/esg/our-people-communities/diversity-inclusion



Our governance & compliance

OUR AMBITION

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

FOCUS AREAS

- 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.
- Strengthen cyber security and manage AI risks by protecting our data and systems.

SUPPORTING THE UN SDGs MOST RELEVANT TO OUR STRATEGY



Establishing our Responsible Change Forum
to drive progress of our key initiatives and embed ESG across the business

97%

of supplier invoices paid within agreed terms

ESG POLICIES AND REPORTS
Our ESG policies and reports which form part of our commitment to being a responsible and transparent business can be found on our investor website.



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

Working responsibly continued

Governance of our ESG strategy

Governance is a key component of our ESG strategy. Our Corporate Responsibility Committee (a formal Committee of the Board) oversees the Group's corporate responsibility agenda and ESG governance. This year, we established a new executive forum, the Responsible Change Forum.

NEW RESPONSIBLE CHANGE FORUM

The Responsible Change Forum brings together senior stakeholders from across Autotrader to shape and oversee our ESG strategy and initiatives. It aligns priorities, drives progress and helps embed ESG considerations across the business.

Reporting to the Corporate Responsibility Committee, the Forum monitors performance against KPIs and commitments, supports constructive challenge and ensures clear accountability for delivery. This strengthens governance and helps the Board satisfy its oversight responsibilities.

Meeting quarterly, the Forum has currently identified two key priorities alongside its broader role across ESG. These priorities are: helping consumers make more sustainable vehicle choices, and tackling digital inclusion.

The Forum will review external reporting requirements and emerging regulations, and monitor delivery against our KPIs and commitments.



The Responsible Change Forum ensures our ESG strategy is focused, measurable and aligned to what matters most – driving meaningful progress in areas like environment and digital inclusion while maintaining strong governance and accountability.

Nathan Coe
Chief Executive Officer



Corporate Responsibility Committee

Providing oversight, scrutiny and challenge on matters relating to the Group's ESG strategy.

Responsible Change Forum

FORUM REPRESENTATIVES

CEO and CFO

Senior Leadership members

FORUM OBJECTIVES

To agree and deliver on what we commit to delivering and how and when we achieve this.

Oversee initiatives across Autotrader

Monitor and discuss progress against KPIs and commitments

Engage with external reporting and rating agency scores

Ensure clear ownership and accountability for delivery

EMPOWERING COMMUNITIES

[P72 Report of the Corporate Responsibility Committee](#)

Working responsibly continued

Driving forward our priority initiatives

The Forum will focus on two priority areas central to our ESG strategy: the environment and digital inclusion.

Helping consumers make more sustainable vehicle choices

The UK aims to achieve net zero greenhouse gas emissions by 2050. 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 a responsible business, Autotrader is committed to reaching net zero in its operations by 2040. We also focus our efforts on supporting the automotive industry and informing public policy, and helping consumers through platform and information improvements.

KEY AREAS OF FOCUS:

- How we influence the transition to electric vehicles – informing public policy and regulation by sharing our data and insights with Government.
- Empowering consumers to make more sustainable vehicle choices by developing our platforms to provide transparent information on fuel efficiency, emissions and alternative energy options.
- Progress against our net zero targets – this includes monitoring our carbon emissions and actions that we can take to reduce these. In addition, reviewing our strategy for purchasing carbon removal credits.

72

electric vehicle brands in the UK
(up from c.45 in 2019)

Source: Autotrader Road to 2030, Feb 2026.

SCAN TO READ THE LATEST
EDITION OF THE ROAD TO 2030



Our commitment to digital inclusion

Digital inclusion remains a major challenge. Digital inclusion is being able to access the internet and engage online – safely and confidently – when you need and want to. With opportunities and services increasingly online, digital inclusion is a basic need. As a minimum, this requires a device, connectivity, digital skills, and support when needed. As a tech company, Autotrader is committed to tackling digital inclusion and we have therefore partnered with Good Things Foundation and Greater Manchester Combined Authority ('GMCA') to tackle digital exclusion across Greater Manchester. Through the partnership we will contribute commercial insight and help explore sustainable, long-term approaches to improving affordable digital access.

KEY AREAS OF FOCUS:

- How we can support the development of essential digital skills, providing education and training so people can use digital tools confidently and safely.
- How we can support access to necessary equipment, such as computers and smartphones, that enable individuals and communities to connect and engage in the digital world.
- Ensuring our platform and resources are accessible, so everyone, regardless of background or ability, can participate in our increasingly digital society.

21m

adults can't complete the essential digital tasks for work

Source: Good Things Foundation Digital Nation Report 2025.

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The environment

We take a practical approach to managing climate risks – reducing emissions where we have direct control, keeping pace with evolving regulation and using our capabilities and voice to support our industries. We published our Climate Transition Plan last year, available on our corporate website:

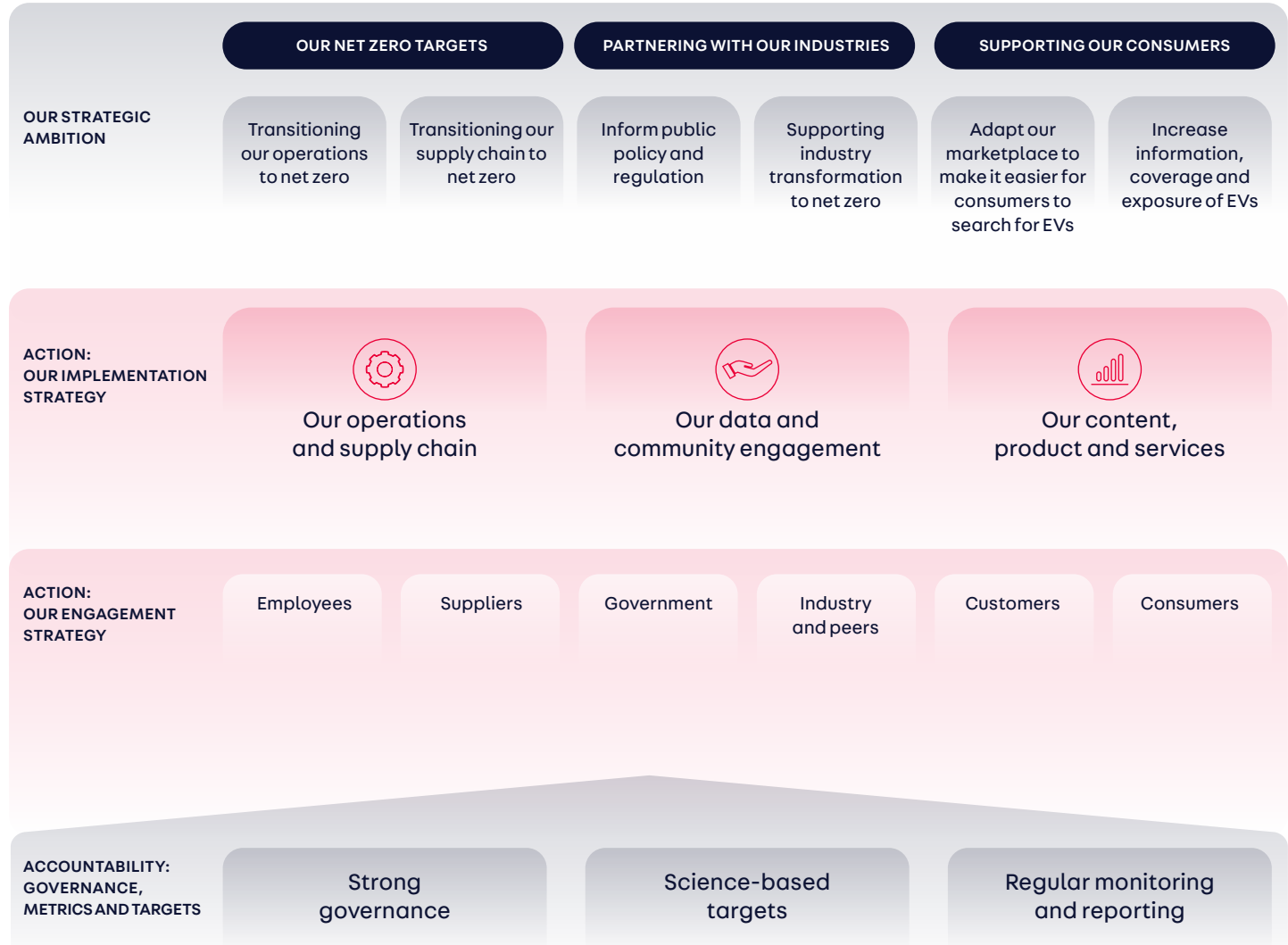
plc.autotrader.co.uk

The UK aims to achieve net zero greenhouse gas emissions by 2050. Autotrader is committed to reaching net zero in its operations by 2040. Although our carbon footprint is relatively small, we focus our efforts on supporting the automotive industry and informing public policy, and helping consumers through platform and information improvements.

SCAN TO READ OUR FULL CLIMATE TRANSITION PLAN



Our Climate Transition Plan at a glance



Working responsibly continued

Progress in 2026

Our strategic ambition is focused on three key areas:

Supporting the industry and Government with the transition to electric vehicles

Over the past year, the Government has made several significant announcements relating to the electric vehicle ('EV') transition, including: changes to the Zero Emission Vehicle ('ZEV') mandate; the introduction of Electric Car Grants for new vehicles priced under £37,000; plans for a pay per mile EV tax from 2028; and a national advertising campaign to promote EV adoption. While well intentioned, these announcements have been met with mixed reactions, with some stakeholders highlighting inconsistencies in timing and messaging.

Throughout the year, we supported the Government by sharing our data and insights on the state of the EV transition. To promote more equitable adoption, we published our second No Driver Left Behind report, focusing on how EV uptake varies significantly by income, reinforcing the need for a more accessible transition. We also continued to publish our Road to 2030 report, which remains a leading source of EV market analysis. Engagement with Government departments has increased, extending the reach and impact of our insights, and we now regularly contribute to All Party Parliamentary Groups and Transport Committee discussions. We also supported the national EV advertising campaign by advising on audience targeting using our data.

Addressing misinformation about EVs remained a priority. Campaigns such as Electric cars: The Facts continued to provide clear, up to date information on EV pricing, safety and environmental credentials. The campaign was developed in partnership with the SMMT and ChargeUK, was endorsed by the Department for Transport, and is now supported by a growing number of sector businesses.

We further expanded our content and communications to support retailers navigating the EV transition, regularly sharing data and insights through webinars, masterclasses and our EV Insight Hub. To support industry partners on their sustainability journeys, we continued our partnership with the Carbon Literacy Trust, funding the Automotive and Digital & Technology Carbon Literacy Sector Toolkits. In the automotive sector, 371 organisations have now completed training, with over 8,000 professionals accredited as carbon literate (2025: 5,000). In the first year of the Digital & Technology toolkit, more than 200 individuals across 80 organisations achieved accreditation. Accredited organisations receive materials to deliver their own one day Carbon Literacy training. We also continued to recognise industry partners for their sustainability leadership through our annual Retailer and Driver Choice Awards.

Supporting our consumers

We continued to help consumers make more environmentally friendly choices and navigate the electric transition. This included ongoing buying guides, explainers and EV hub content, alongside EV-focused editorial and YouTube reviews. Our EV giveaway continued to drive engagement, reaching 17+ million entries since launch, and we maintained promotion of 'The Facts' myth-busting content across channels to raise awareness of key EV information.

Building on insights from our No Driver Left Behind: Women and the journey to electric report, we increased engagement with consumer lifestyle media to encourage more relevant EV coverage and awareness among women, securing repeated coverage across key titles.

Visibility of EVs improved on the marketplace with the launch of the new AI-powered search filters allowing buyers to find what they want more easily. We launched 'Green Ratings' on our new car reviews, to strengthen accountability for car brands on climate impacts, whilst empowering consumers to make more environmentally friendly vehicle choices. The ratings draw on brand and model data alongside manufacturer information and supported by data from World Benchmarking Alliance's Climate and Energy Benchmark.

SCAN TO READ OUR NO DRIVER LEFT BEHIND REPORT



Our operations

The fit out of our new office space was delivered with sustainability at the forefront. Working closely with Oktra (a certified B Corp specialising in designing eco-friendly, energy-efficient offices with sustainable materials) our aim was to embed responsible design principles throughout the project.

This included re-use of existing materials where possible, careful selection of sustainable finishes, and design decisions aimed at improving energy efficiency, employee wellbeing and long-term environmental performance.

Working responsibly continued

CLIMATE-RELATED FINANCIAL DISCLOSURES

The Group has prepared the following disclosures in line with the 2021 updates to the TCFD Final Report and Annex, including supplementary guidance for all sectors. At the time of publication, and in accordance with the FCA's Listing Rule 9.8.6R(8), the Group has made climate-related financial disclosures consistent with the TCFD recommendations. We continue to develop our net zero strategy and to assess climate-related risks and opportunities and their potential financial impact.

Our climate-related financial disclosures also comply with the Companies Act 2006, as amended by the Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022. 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.

TCFD recommended disclosure	Group progress
Governance 1. Describe the Board's oversight of climate-related risks and opportunities. 2. Describe management's role in assessing and managing climate-related risks and opportunities.	<p>Climate governance is integrated into our existing processes, with accountability embedded across the business. The Corporate Responsibility Committee holds the Executive Directors to account for climate-related risks and opportunities and their impacts on the business and the wider environment. The Responsible Change Forum meets quarterly to manage these day to day and track progress against climate goals and targets.</p>
Risk management 3. Describe the organisation's processes for identifying and assessing climate-related risks. 4. Describe the organisation's processes for managing climate-related risks. 5. Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	<p>The Board is collectively responsible for determining the nature and extent of the principal risks that may impact the business. We have a well-established risk management framework with three lines of defence: our ALT and oversight functions, our Committees and our independent assurance. Our risk management framework, including our processes for identifying, assessing and managing risk, is described on pages 43 to 44, and the Group risk register includes climate change as a principal risk. Climate-related risks are reviewed at least twice a year through our overall risk review process, overseen by the Risk Forum. We consider a range of risks and opportunities, including physical and transition factors, and aim to capture opportunities from the shift to electric vehicles while mitigating risks.</p> <p>Our risk management approach supports ongoing identification and assessment of climate-related risks. We maintain an environment/climate risk register, reviewed regularly by the risk owner, their delegates and our risk management team. Each climate-related risk has an owner, with controls and mitigating actions recorded.</p> <p>Autotrader plays an important role in the UK automotive ecosystem, and climate change is driving unprecedented industry change. This is largely driven by the transition from internal combustion engine ('ICE') vehicles to Zero Emission Vehicles ('ZEVs'), which could significantly reshape automotive retail. We support this transition by providing content to help consumers 'demystify' EVs, lobbying Government to incentivise uptake and sharing our data and insights to inform EV policy.</p> <p>Climate change also presents risks to our business and supply chain, including through regulatory change. It is therefore essential that our risk management process considers climate change so we can understand its impacts on our business and the automotive industry.</p>
Strategy 6. Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term. 7. Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning. 8. Describe the resilience of the organisation's strategy, taking into consideration different climate scenarios.	<p>Our environmental strategy focuses on the following areas: (i) Autotrader's net zero commitments; (ii) supporting the automotive industry and informing public policy and regulation; and (iii) supporting our consumers. We have undertaken climate scenario analysis and refined our assessment of the risks and opportunities posed by climate change and how they might impact our business, including consideration of the resilience of our business strategy. See pages 31 to 32 for more information.</p> <p>We have identified key climate-related risks and opportunities that could significantly impact our operations and strategy over the short (1-5 years), medium (5-10 years), and long term (10+ years). A summary of these risks is provided in the table on page 32.</p>
Metrics and targets 9. Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process. 10. Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas ('GHG') emissions and the related risks. 11. Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	<p>The most relevant metrics, on which we report annually, are our GHG emissions and carbon intensity ratios, which provide a clear view of the Group's footprint. See page 33 for our 2026 footprint. We submitted our annual CDP questionnaire and received a B rating for the 2025 reporting cycle. Scores range from A (best) to D-. Our current score indicates we understand climate impacts and are taking coordinated action.</p> <p>To help us accurately assess and develop strategies to reach our net zero target, the reporting of our GHG emissions includes a full inventory of Scope 3. We are committed to the Science Based Targets initiative and our near-term (2030) and long-term (2040) targets have both been validated by the SBTi. We are committed to:</p> <ul style="list-style-type: none"> (i) Reduce absolute Scope 1 and 2 GHG emissions 50% by FY2030/31 from a FY2022/23 base year; (ii) Reduce absolute Scope 3 GHG emissions 46.2% over the same timeframe; and (iii) Reduce absolute Scope 1, 2 and 3 GHG emissions 90% by FY2040/41 from a FY2022/23 base year. <p>Our GHG emissions have been audited by a third party, SE Advisory Services, providing assurance over our emissions reporting.</p> <p>We also monitor other metrics to assess our progress against our environmental priorities. These are set out on page 34.</p>

Working responsibly continued

ASSESSING CLIMATE-RELATED RISKS AND OPPORTUNITIES

To protect our business from climate change, we are integrating climate resilience into our strategy by identifying related risks and opportunities. As an online marketplace with a low carbon footprint, our model is sustainable, but the automotive sector faces increasing pressure to reduce environmental impacts from both consumers and government. Our climate risk assessment considers both physical and transition risks, including policy changes and emerging technologies.

We use TCFD-recommended climate scenarios to evaluate potential impacts on costs and revenues over the short, medium and long term, aligning risk management with our business strategy. 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. Analysis suggests no immediate material financial threat, and our strategic plans position us to address climate risks and benefit from opportunities. While regulatory and stakeholder expectations may accelerate, we remain prepared to adapt quickly and monitor evolving legislation and consumer preferences.

We will regularly review and adjust our analysis scenarios and timeframes as necessary. Key risk management recommendations from our climate change scenario analysis include:

- **Policy/Regulation:** Increased regulation is expected to pose the greatest financial risk to Autotrader over time. To mitigate this, we must reduce exposure and adapt our marketplace to evolving car buyer preferences, while ensuring ongoing compliance with relevant regulations.
- **Market:** The Government's net zero goals have led to a ban on new petrol and diesel vehicles by 2035, accelerating consumer adoption of electric cars. Autotrader can address this market risk by enhancing our appeal as the top destination for electric vehicle buyers.

CLIMATE SCENARIOS:

Hot house world (>2°C)	Orderly transition (1.5°C)
<ul style="list-style-type: none"> • Assumes business as usual, some climate policies are implemented but efforts are insufficient to halt significant global warming • Continuation of current projection of carbon emissions with little or no abatement or mitigation 	<ul style="list-style-type: none"> • Assumes climate policies and legislation are introduced early to limit climate change and become gradually more stringent • Both physical and transition risks are relatively subdued

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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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 Autotrader'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 Autotrader.

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 EVs and their components, impacting supply of the vehicles into the UK and available stock on Autotrader's platform.

Geo-political instability: Political unrest, trade tensions, tariffs and sanctions could 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 Autotrader'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.

Working responsibly continued

Climate-related scenario analysis

Mitigation/response		Financial impact			Inherent likelihood
		Minor	Moderate	Major	
		Short term 0-5 years	Medium term 5-10 years	Long term 10+ years	
PHYSICAL RISK – Increased frequency/severity of extreme weather and climate-related natural disasters					
Our technology infrastructure is cloud-based and supported by disaster recovery and business continuity plans, including tools to help employees in emergencies. COVID-19 showed we can complete sales without physical showrooms, and digital retailing will help retailers compete online.	>2°C	●	●	●	Low
	1.5°C	●	●	●	
Significant cost increases would be required to materially affect the business. We continually review the cost base so we can manage increases and protect profit margins.	>2°C	●	●	●	Medium
	1.5°C	●	●	●	
TRANSITION RISK – Increased regulation relating to climate change					
We monitor policies affecting our core business to identify emerging risks, opportunities, and financial impacts. In parallel, we are evolving our EV offering and marketplace information to meet shifting buyer preferences. The Responsible Change Forum drives our environmental strategy, overseen by the Corporate Responsibility Committee. We report in line with the TCFD recommendations and report progress towards our net zero ambitions against our science-based targets.	>2°C	●	●	●	High
	1.5°C	●	●	●	
TRANSITION RISK – Regulation discouraging the use of internal combustion engine ('ICE') vehicles and demand for sustainable products and services					
We will keep adapting our marketplace to meet changing buyer preferences. Used car prices should continue to reflect supply and demand, potentially improving affordability if demand softens.	>2°C	●	●	●	High
	1.5°C	●	●	●	
TRANSITION RISK – Increased reputational risk associated with the automotive industry and misrepresenting environmental claims					
We are targeting net zero by 2040, reducing our operational footprint while supporting broader industry progress. We set clear reduction targets, report progress, and collaborate with customers, suppliers, and policymakers.	>2°C	●	●	●	High
	1.5°C	●	●	●	
TRANSITION RISK & OPPORTUNITY – Changing consumer preferences					
There is risk and opportunity associated with consumers' preferences for certain vehicle types. Likely the risk and opportunity would be taken together, and supply/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	●	●	●	Low
	1.5°C	●	●	●	
TRANSITION RISK – Achieving resource efficiency through cutting our carbon footprint and improving energy efficiency					
This creates opportunity as costs associated with energy use are reduced and increased costs associated with carbon taxation are avoided. We continue to identify and implement reduction initiatives to reduce our absolute usage.	>2°C	●	●	●	Medium
	1.5°C	●	●	●	

Working responsibly continued

Targets and metrics

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.

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. We calculate relevant Scope 3 emissions by using activity data where possible (rather than spend data). Data quality will improve as our measurement matures.

INDEPENDENT VERIFICATION OF OUR GHG EMISSIONS

SE Advisory Services has independently assessed and verified Autotrader's GHG emissions following verification standard ISO 14064-3:2019. Based on the data and information provided by Autotrader and the processes and procedures followed, nothing has come to their 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 CO₂ emissions¹

	2026		2025	
	UK	Global	UK	Global
Scope 1	179	179	116	116
Scope 2 (location based)	510	510	204	204
Total (Scopes 1 and 2)	689	689	320	320
KwH ('000s)	3,092	3,092	1,277	1,277
Purchased goods and services		25,096		19,457
Capital goods		11,531		1,375
Fuel and energy-related activities		218		91
Upstream transportation and distribution		-		-
Waste generated in operations		95		100
Business travel		555		933
Employee commuting (inc. working from home)		683		725
Upstream leased assets		-		-
Use of sold products		104,923		69,950
End of life treatment of sold products		267		172
Investments		67		45
Scope 3 (total)		143,435		92,848
Total (Scopes 1, 2 and 3)		144,124		93,168
Group revenue		£624.3m		£601.1m
Tonnes of CO ₂ equivalent per FTE ²		115.9		73.5
Tonnes of CO ₂ equivalent per £million turnover		230.9		155.0
Scope 2 (market based)		0.2		0.1
% renewable		99%		99%
Autotrader total emissions		19,434		9,903
Autorama total emissions		124,690		83,265

1. Scopes 1, 2 & 3 are reported in tonnes of CO₂ equivalent.

2. Based on average number of employees in the Group throughout the year 2026: 1,244 (2025: 1,267).

Working responsibly continued

OUR EMISSIONS

A core part of our environmental strategy is reducing emissions from our operations and facilities. Scope 1 and Scope 2 are relatively low, but have increased this year due to our larger new office and more electric company mileage from salary sacrifice vehicles.

Our Scope 3 emissions have increased this year owing to two primary factors: the initial costs of our new office; and the practice of purchasing vehicles within our Leasing business. Vehicle purchases is the primary source of our carbon emissions and this activity will continue in the near future, leading to higher carbon emissions.

Other key metrics

SUPPORTING THE AUTOMOTIVE AND TECHNOLOGY INDUSTRIES

Number of EVs advertised on Autotrader

34,153

average as at March 2026 (2025: 33,603)

Share of EVs advertised on Autotrader

7.8%

during FY26 (FY25: 5.6%)

Number of EVs delivered by Autorama

1,514

during FY26 (FY25: 950)

Number of videos produced covering EVs

45

during FY26 (FY25: 41)

SUPPORTING CONSUMERS

Number of EV advert views on Autotrader

189 million

during FY26 (FY25: 150 million)

Share of EV advert views on Autotrader

6.5%

during FY26 (FY25: 5.0%)

Targets and metrics

OUR OPERATIONS

We have established near-term (2030) and long-term (2040) emissions reduction targets in line with the SBTi Net Zero Standard.

SCOPE 1 & 2 REDUCTION TARGET (TONNES OF CO₂)

Near-term target

50%
reduction

Long-term target

90%
reduction

SCOPE 3 REDUCTION TARGET (TONNES OF CO₂)

Near-term target

46.2%
reduction

Long-term target

90%
reduction

Metric	Scope	Implemented or planned activities	Timeline
Switch 100% of our fleet vehicles (Autotrader and Autorama) to be EV or low emission	SCOPE 1	<ul style="list-style-type: none"> 2 remaining vehicles, both of which are fully electric or hybrid. 	✓ IMPLEMENTED
Energy: reduce overall electricity/gas usage by 50% (against a 2023 baseline) and procure 100% renewable energy for our remaining needs	SCOPE 1 & 2	All of our offices are on renewable energy tariffs.	✓ IMPLEMENTED
		In all our offices, lighting has been upgraded to LED light bulbs and sensors installed so that lighting is activated by movement.	✓ IMPLEMENTED
		We have reduced the carbon lifecycle of our employee focused technology.	✓ IMPLEMENTED
Migrating our data centres to the cloud and review of data retention policies	SCOPE 2	We have reduced our office space in London and Hemel Hempstead. During the year we relocated our Manchester head office to state-of-the-art facilities in the heart of Manchester's tech community. Sustainability was a core design principle and the building is expected to achieve BREEAM Excellent status, as well as a NABERS 5-star rating and an EPC A rating.	✓ IMPLEMENTED
		<ul style="list-style-type: none"> 100% of our data centres have been migrated to cloud providers. 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. 	✓ IMPLEMENTED
Gathering supplier data and engaging suppliers	SCOPE 3.1	<ul style="list-style-type: none"> We have introduced a supplier engagement strategy to gather ESG and performance data. Ethical procurement questionnaires now cover c.75% of supplier spend. We have expanded sustainability discussions with the suppliers driving our highest emissions to understand their maturity, including whether they monitor and report emissions and which scopes they cover. 	✓ IMPLEMENTED
		<ul style="list-style-type: none"> Develop guidance for supplier selection criteria specifically relating to climate, including sharing knowledge and learnings with suppliers that are seeking to improve their environmental maturity. 	📅 PLANNED
Business travel	SCOPE 3.6	<ul style="list-style-type: none"> We have updated our travel policy and booking system to promote lower-carbon business travel choices. Salary sacrifice scheme introduced for employees to lease an EV or low emission hybrid vehicle in a tax efficient way. 	✓ IMPLEMENTED
Purchased vehicles	SCOPE 3.1, 3.10 & 3.11	<ul style="list-style-type: none"> Develop a clear plan for managing the volume of vehicles taken on balance sheet through Autorama. 	🔄 IN PROGRESS

Working responsibly continued



Our people & communities

We're proud of the diverse, dedicated and talented people behind our success.

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.

INVESTING IN AND SUPPORTING OUR TALENT

We are committed to personal development and career progression – whether mastering current roles, gaining professional qualifications or preparing for the next role. Our emphasis on growth has led to strong retention rates – attrition remains low at 16% (2025: 10%).

Our Learning Academy offers courses and programmes that support inclusion, personal growth and high performance, complemented by coaching available to everyone. We promote mentoring and sponsor professional qualifications to foster continuous growth. Mandatory training ensures compliance with legislative and regulatory standards.

Year	2026	2025
Hours of mandatory training	1,756	2,328
Hours of non-mandatory training	33,528	28,291
Annual cost of training ¹	£568k	£476k
Average cost per employee ²	£456	£376
Employees studying for professional qualification	13	16
Employees on an apprenticeship/early careers ³	53	66

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 1,244 (2025: 1,267).
3. As at 31 March – this excludes individuals who completed their programme during the reporting period.

DEVELOPING OUR LEADERS

Leadership and people management are critical to sustainable growth and an inclusive, high-performing culture. This year we invested in leaders with tools, resources and skills to grow individuals and teams, collaborate, live our values and deliver results for Autotrader and our customers.

Our core programme, Leader as Coach, is a three-day course for managers, focused on psychological safety and trust, listening, coaching for high performance and abundant thinking.

Our inclusive leadership programme builds role-model behaviours so teams feel valued, respected, supported and inspired.

We continue to strengthen our internal coaching capability, with a well-established group of accredited in-house coaches and a strong

pipeline progressing towards accreditation, helping people grow and thrive by embedding development into everyday work.

EARLY CAREERS

Our Early Careers team develops future talent for critical business roles through our Early Careers Academy, supporting onboarding, skills and wellbeing. In 2026, we welcomed 38 apprentices, and graduates, with 15 apprentices completing Level 3–5 qualifications.

This year we launched our first T Level placements, offering eight roles to students from Manchester and Oldham colleges, all of whom completed the programme. To further strengthen this pathway, we also expanded our Level 4 Software Engineering Apprenticeship, with several T Level students progressing into the September 2026 cohort.

Inclusive Culture Development Programme

Autotrader'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 AUTOTRADER – A CULTURE OF INCLUSION

As part of Autotrader's 'Great Start', all new starters attend this workshop. In one day, colleagues build a shared understanding of diversity and inclusion, meet our Employee Networks, and explore bias and how to challenge non-inclusive behaviour.

INCLUSIVE RECRUITMENT

Everyone involved in hiring completes a full-day inclusive recruitment workshop, covering bias, best practice, our scoring frameworks, and stronger shortlisting and interview skills.

INCLUSIVE PEOPLE MANAGEMENT

This year we relaunched our Inclusive People Management module to help managers get the best from every team member. Using real scenarios, it supports safe, practical conversations about inclusion and signposts the support available across Autotrader.

DIVERSE TALENT ACCELERATOR PROGRAMME ('DTA')

DTA accelerates high-potential talent to build a pipeline of diverse future leaders, combining experiential and group learning with coaching and sponsorship.

We encourage colleagues from groups under-represented in senior leadership – including people of colour, women, LGBT+, disabled and neurodiverse colleagues, and those from lower socio-economic backgrounds – to apply.

THE BLACK EXPERIENCE

Co-designed with an external inclusion consultant and Autotrader's Black colleagues, these workshops build awareness of the challenges Black employees can face in and out of work and highlight practical behaviours managers can use to strengthen Black inclusion.

NEURODIVERSITY AND MENTAL HEALTH MANAGER AWARENESS

Alongside Mental Health Awareness training, we refreshed our Neurodiversity and Mental Health Manager Awareness module to equip people managers to have confident, meaningful conversations and signpost the right support across the business.

Working responsibly continued

DIVERSITY AND INCLUSION

At Autotrader, building a diverse and inclusive community isn't just something we talk about, it's something we actively work towards every day. We value a diverse and inclusive workforce, which enhances our culture and business by attracting and developing talent. Our diversity and inclusion vision is: "To nurture our inclusive culture and enrich our community with diverse individuals, who collaborate effectively, perform at their best, and contribute to the success of our organisation, benefiting our industries and wider communities". 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 build a diverse and inclusive culture at every level of the Company, with particular focus on leadership. During the year, we enhanced our Inclusive Culture Development Programme to further support these goals.

Employment of disabled persons

We remain committed to supporting disabled and neurodiverse employees and those who become disabled during their employment with us. We focus on individualised support, enabling all colleagues to achieve their 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. This year, we introduced

our Inclusion Passport, a personalised document capturing health conditions, disabilities, neurodiversity, and related workplace adjustments to ensure clarity and continuity. Autotrader continues to be recognised as a Leader of the Disability Confident Scheme, reflecting our ongoing commitment to inclusivity. We work directly with employees to address health needs and implement reasonable adjustments that meet individual requirements. 18.6% (2025: 13.3%) of our employees have disclosed a disability or neurodiverse condition.

We have been recognised as one of the Top 75 employers in the Social Mobility Employer Index by The Social Mobility Foundation for the fifth consecutive year, ranking 21st in the index.

GENDER AND ETHNICITY PAY GAP

We published our Gender and Ethnicity Pay Gap Report 2025 (snapshot date: 5 April 2025). Ahead of expected mandatory Ethnicity and Disability reporting, we continue to report our Disability Pay Gap voluntarily.

We've made progress in our priority areas. At Autotrader Limited, the gender pay gap reduced (mean 9.6% to 8.4%; median 14.9% to 13.2%). Women's representation is at 42.9%. The median ethnicity pay gap reduced from 19.8% to 16.9% and the mean from 18.0% to 17.0%, with diverse hires exceeding 34%.

This reflects more inclusive hiring and a stronger employer brand, including our Career Stories campaign. We've also analysed the hiring funnel to remove barriers and support hiring teams with tools and training to reduce bias.

We remain focused on improving diversity at all levels, particularly in senior roles. The full report is available on our corporate website.

SCAN TO READ OUR
LATEST PAY GAP REPORT

**Driving diversity and inclusion through our employee-driven networks**

A core part of our diversity and inclusion strategy is centred around our employee-driven networks. Everyone at Autotrader is encouraged to join one of these networks. The networks and their leaders are a core part of our culture and employee experience, 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 two senior leadership sponsors to help drive change and champion network initiatives.

To read more about our networks, go online:

plc.autotrader.co.uk/esg/our-people-communities/diversity-inclusion/



Working responsibly continued

**ELEVATING THE COLLEAGUE EXPERIENCE**

Culture is as tangible and important to our performance as our strategy, competitive position, product and technology. During the year, we completed the move to our new campus at Circle Square in Manchester. While only a short distance from our previous site, the new campus represents a meaningful step forward, providing a modern working environment, enhanced collaboration space, improved facilities for customers and community engagement, upgraded technology and stronger environmental credentials.

Our commitment to a high-performance culture is underpinned by transparent, multi-channel communication. We actively listen to colleagues throughout their career journey, from onboarding questionnaires through to exit interviews, enabling us to capture honest and timely feedback at every stage.

From a culture and morale perspective, it has been a challenging year for our people. Factors included organisational restructuring during the period, the recent decline in our share price and negative retailer sentiment in response to the scaling of Deal Builder, and a tighter approach to working in the office, which together contributed to a period of uncertainty for colleagues.

In our most recent annual confidential survey 72% of colleagues agreed or strongly agreed with the statement "I am proud to work for Autotrader" (2025: 91%). Whilst this is lower than in previous years, other people measures, such as recruitment, absence and talent retention, have not been impacted.

Engagement with our colleagues has remained a priority. To translate colleague feedback into tangible action, we launched Community Conversations – structured forums designed to develop collaborative solutions aligned to our key focus areas. The Remuneration Committee Chair held dedicated remuneration sessions with a wider colleague group, and Non-Executive Directors attended Community days and the annual all-employee conference. Strategic alignment is further reinforced through the Board Engagement Guild, an important conduit between colleagues and the Board. The Guild met three times during the year, enabling direct dialogue on topics including organisational change, workplace environment and executive remuneration.

CONNECTED AND COLLABORATIVE WORKING

Maintaining alignment with our purpose and strategy, and ensuring each team understands how their work contributes to our growth ambitions, is central to our ongoing success. We remain committed to Connected Working, our hybrid model that balances flexibility with collaboration. Our office space is designed to enhance connectivity and support effective collaboration across teams.

Senior leaders continue to be visible and accessible, supporting open and transparent communication. Our all-employee conferences provide updates on business strategy, while regular ALTV sessions enable leaders to share progress and celebrate achievements. We leverage communication tools, including Slack, to facilitate seamless collaboration across the business, regardless of working location.

Alongside this, we host regular and purposeful social events that bring colleagues together and reinforce our culture. From executive-led



International Women's Day panel discussions to wider cultural celebrations, these events build meaningful connection, strengthen relationships and foster a sense of belonging that underpins our collaborative culture.

PAY AND BENEFITS PACKAGE

Our reward structure is designed to attract, retain and motivate our colleagues, supporting delivery of our business strategy. We offer a comprehensive pay and benefits package, including employee pension contributions up to 7%, private medical cover, income protection, life assurance, retirement benefit and enhanced family/dependant leave provisions.

Share ownership remains central to our culture. All colleagues are eligible to participate in the One Autotrader Share Award ('OATSA'), which provides shares with a value equivalent to 10% of salary over three years. In addition, annual participation in our SAYE schemes remains strong, with 36% of colleagues actively contributing to one of the live schemes.

WELLBEING AND SAFETY OF OUR EMPLOYEES

We promote employee health and wellbeing through healthcare benefits, mental health support and leadership training, with access to Mental Health First Aiders and the Employee Assistance Programme.

Our 'Respect at Work' Policy sets clear expectations and zero tolerance for bullying, discrimination and harassment. Regular training is provided on sexual harassment and colleagues are supported in understanding their rights under the Equality Act 2010.

We support financial wellbeing through access to mortgage advice, will-writing services, travel loans and salary finance. Health and safety remains a priority, with appropriate policies and insurance in place. Two RIDDOR reports were submitted during the year, and DSE assessments continue to be completed in line with requirements.

Working responsibly continued

GENDER AND ETHNICITY DIVERSITY

We are dedicated to fostering a diverse candidate pool and ensuring that fair representation is maintained in senior roles through refined talent management and succession planning. Our ongoing commitment is to increase ethnically diverse representation at leadership levels. As with our approach to gender diversity, we are focused on recruitment processes, most of which relate to lower-level roles, and on developing and promoting a broad and diverse group of individuals throughout the organisation.

The Parker Review has extended its scope to senior management, calling on the FTSE 350 to set percentage targets for ethnic minority executives in senior management roles by December 2027. In response, we have set a target for 10% of senior management positions (ALT and ALT-1) to be occupied by individuals from ethnically diverse backgrounds by March 2027.

At a Board level, as at 31 March 2026, the Board comprises an equal split of four men and four women (March 2025: six women and three men), exceeding both the FTSE Women Leaders Review recommendations and the FCA Listing Rules requirements, which set a target of 40% women's representation. In addition, a woman is appointed as the Senior Independent Director, meeting the targets outlined in the Listing Rules at LR 9.8.6 (9) (a). The Board also includes two members from ethnically diverse backgrounds, aligning with the recommendation set by the Parker Review.

	As at 31 March 2026										As at 31 March 2025							
	Board			Executive management ALT ²		ALT direct reports		Total Company		Board			Executive management ALT ²		ALT direct reports		Total Company	
	Number	%	Number of senior positions ¹	Number	%	Number	%	Number	%	Number	%	Number of senior positions ¹	Number	%	Number	%	Number	%
Men	4	50%	3	10	59%	45	56%	698	56%	3	33%	3	11	61%	50	56%	721	56%
Women	4	50%	1	7	41%	36	44%	533	43%	6	67%	1	7	39%	40	44%	562	44%
Non binary/ other	-	-	-	-	-	-	-	8	1%	-	-	-	-	-	-	-	7	-
Total	8	100%	4	17	100%	81	100%	1,239	100%	9	100%	4	18	100%	90	100%	1,290	100%

	As at 31 March 2026										As at 31 March 2025							
	Board			Executive management ALT ²		ALT direct reports		Total Company		Board			Executive management ALT ²		ALT direct reports		Total Company	
	Number	%	Number of senior positions ¹	Number	%	Number	%	Number	%	Number	%	Number of senior positions ¹	Number	%	Number	%	Number	%
White British or other White	6	75%	3	16	94%	69	85%	937	75%	7	78%	3	17	94%	73	81%	948	74%
Mixed ethnic groups	-	-	-	-	-	-	-	36	3%	-	-	-	-	-	1	1%	36	3%
Asian /Asian British	2	25%	1	1	6%	7	9%	132	11%	2	22%	1	1	6%	7	8%	144	11%
Black/African /Caribbean /Black British	-	-	-	-	-	1	1%	54	4%	-	-	-	-	-	2	2%	50	4%
Other	-	-	-	-	-	-	-	20	2%	-	-	-	-	-	-	-	16	1%
Not disclosed	-	-	-	-	-	4	5%	60	5%	-	-	-	-	-	7	8%	96	7%
Total	8	100%	4	17	100%	81	100%	1,239	100%	9	100%	4	18	100%	90	100%	1,290	100%

1. Senior positions defined as CEO, CFO, SID and Chair of the Board (and included the COO in 2025).

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

Representation at senior levels

The percentage of women on our Autotrader Leadership Team (ALT):

41%

(2025: 39%)

The percentage of ethnically diverse people on our ALT:

6%

(2025: 6%)

The percentage of women leaders within the Group:

44%

(2025: 44%)

The percentage of ethnically diverse leaders:

9%

(2025: 9%)

Working responsibly continued

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

Our people are committed to making a difference and having a meaningful impact on the communities we operate in.

Our Make a Difference 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. We support various initiatives in both the automotive and technology industries.

We are proud members of the Automotive 30% Club, an organisation dedicated to the recruitment, retention and development of female talent in the automotive industry. Our CEO, Nathan Coe, serves as a patron of the club. We continue to collaborate closely with the Automotive 30% Club and the Consent Collective to drive forward the 'Great Events for All' initiative, which educates the automotive sector about sexual harassment and consent, ensuring that industry events are safe, respectful and inclusive spaces for all. Our podcast series, 'Women in the Driving Seat', continues to highlight both the challenges and achievements of women working within the automotive sector. At our annual Retailer Awards, we celebrate outstanding women in automotive retail through our Woman of the Year Award which recognises inspiring, high-performing women in operational management roles across the industry.

Additionally, we partner with BEN to support mental and physical health throughout the automotive sector, and work with Speed of Sight, providing driving experiences and track days for people who are blind or disabled, regardless of age or ability.



Championing local charities and communities

SUPPORTING LOCAL COMMUNITIES

Our Autotrader Community Funds provide financial support to local community groups and charities in our office locations of Manchester, London, Hemel Hempstead and across the UK.

Through our Autotrader sponsorships, we back fundraising efforts by employees and customers, and offer funding for sports kit and equipment sponsorship for our employees and their families.

PAYROLL GIVING

Employees can donate through payroll giving – 17% do so – which is further supported by Autotrader's match funding of up to £5 monthly per participant.

VOLUNTEERING

All colleagues can take up to two days per year to volunteer in the community. This year, 513 volunteer days were taken, giving colleagues the opportunity to make a difference in their local communities.

513

volunteering days taken

Over the past year, Autotrader hosted a range of meetups in our event space, bringing together Manchester's data, design, delivery and tech communities. Through recurring events and sponsorship with groups such as PyData, Her+ Data, Natter UX and the Manchester Java Community, we continue to support community engagement and knowledge sharing.

Educational Outreach

This year, we delivered Educational Outreach through our partnerships with DigitalHER and DigitalFutures. We supported the third MentorHER cohort for women early in their tech careers, ran more Curiosity Camps and Schools Safaris and launched two new events. Highlights included Ada Lovelace Day (85 young women joining our Women in Software Engineering (WISE) network) and Future Innovators Day, a digital inclusion hackathon for T Level, A Level and BTEC students. We also hosted a Black History Month School Safari with 45 students, led by our Ethnicity Network.

We continue to support the Careers & Enterprise Company through the Enterprise Advisor programme, partnering with two Manchester schools to shape their careers strategies and connect them to outreach opportunities. Additionally, we supported the Greater Manchester Combined Authority's MBacc initiative and promoted technical education pathways.

As active members of the GM Cornerstone Employer Group, we participated in numerous new initiatives, including the Raspberry Pi Foundation Applied Computing Certification, modern work experience through EqualEx and the introduction of virtual work experience.

Our Early Careers team and volunteers delivered 10 "This Girl Is Me" sessions in Manchester and Oldham, supporting the Automotive 30% Club to inspire more young women into automotive and technology careers.

Digital inclusion

This year, we have strengthened our commitment to tackling digital exclusion through a new partnership with the national charity, Good Things Foundation and Greater Manchester Combined Authority ('GMCA'). The partnership builds on the commitment made by Greater Manchester Mayor to address digital exclusion across the region, reflecting a shared ambition to translate policy into practical, long-term action.

Our funding has enabled the launch of a six-month Greater Manchester initiative focused on addressing data poverty through research and strategic planning, rather than direct delivery. Supported by academic input from the University of Liverpool, the project will combine desk research, stakeholder and community engagement, and a series of workshops to better understand the scale and drivers of data poverty. Outputs will include a co-produced five-year roadmap to help shape future policy, coordination and investment, strengthening Greater Manchester's leadership on digital inclusion and generating insights with relevance across the UK.

This year, we continued our partnership with Forever Manchester to provide the Autotrader Digital Inclusion Fund, supporting local charities to deliver technical workshops and programmes. These efforts are designed to upskill members of the local community and help bridge the digital divide.

To further combat digital exclusion, we partner with local charities to repurpose laptops and devices. This sustainable approach ensures our old technology is put to good use, helping individuals and communities overcome digital poverty and promoting greater digital inclusion.

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