

Modern Slavery Act 2015: Transparency Statement for the Autovista Group

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

We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery, forced and compulsory labour and human trafficking in our corporate activities. We constantly seek to improve our practices to combat slavery, forced and compulsory labour and human trafficking.

This statement sets out the steps we have taken to prevent slavery, forced and compulsory labour and human trafficking from occurring within our organisation and our supply chains.

Our Business

The Autovista Group (the "**Group**") is a leading provider of automotive pricing insights along the entire lifecycle of a vehicle. The Group provides pricing insights across more than 20 countries. Autovista, Eurotax, EV-Volumes, Glass's, Rødboka and Schwacke are our highly-respected, market-leading brands. The Group has more than 750 employees and operates across the UK, Europe and Australia as a fully flexible business, allowing our employees full flexibility to decide where and when they do their work.

This statement is made on behalf of the UK parent company of the Group, Autovista Bidco Limited, for itself and each member of the Group.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery and human trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships. The importance

of complying with applicable law, including the UK Modern Slavery Act 2015, is reflected in our Group values (see 'Our Values' below).

Our Group's Executive Management Team is united in, and central to furthering, our commitment to ensuring that high ethical standards are demonstrated and maintained at all times. Our Code of Ethics, which is a policy document applicable to all staff and any other individuals acting on our behalf, underpins our ethical trading position, which is a key strategic focus for the Group. This Code includes dedicated sections regarding anti-slavery and human trafficking as well as employment conditions.

We commit to adhering to the four UN Global Compact labour principles throughout our operations:

1. Freedom of association and the effective recognition of the right to collective bargaining.
2. Elimination of all forms of forced and compulsory labour.
3. Effective abolition of child labour.
4. Elimination of discrimination in respect of employment and occupation.

We ensure that all staff working for us are engaged in accordance with the law. We undertake right to work checks on all direct employees prior to them commencing their employment. This includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work.

In addition, all staff who have any concerns that modern slavery may be occurring in any part of our organisation or supply chains are required (through clear reporting lines) to notify senior management so that the issue can be escalated appropriately and addressed effectively. We have processes and policies in place to protect whistleblowers and their anonymity. These processes and policies are reviewed annually to check that they are still current and with a view to increasing their effectiveness. In 2022 we also launched a new anonymous whistleblowing application, which is a safe, secure, anonymous and confidential way in which staff can communicate misconduct, including in relation to modern slavery matters. The aim of this is to encourage transparency and reporting by making it simple to report and at the same time protecting the anonymity of whistleblowers. In accordance with the Group's Whistleblowing Policy, staff can also raise concerns with our People and Performance Team, our General Counsel or

our Chief Risk Officer in confidence to discuss any wrongdoing. We also host employee forums, which promote transparency and offer employees another route to raise any concerns they may have.

Our Supply Chains

Our supply chains include suppliers from a number of sectors, particularly the motor industry, IT software and hardware, and professional services. We also occasionally use agencies to supply agency staff.

We seek to ensure that those within our supply chains align with our ethics and values. As part of our risk assessment within our supply chains, we review commitments made by many of our suppliers against modern slavery (as detailed further below). Wherever possible, we seek to include appropriate provisions requiring compliance with applicable laws in our supplier contracts, and, in some cases, we include specific reference to modern slavery legislation (for example, the UK Modern Slavery Act 2015 or the Australian Modern Slavery Act 2018).

To date, we are not aware of any slavery or human trafficking in our supply chains. If we were to become aware of any such activity in the future, we would undertake an urgent and thorough investigation. If any concerns were uncovered, we would work with the relevant supplier to ensure that appropriate action was taken to address the issue. Our response may include the termination of our business relationship with that supplier.

As part of the Group's initiative to identify and mitigate risks and to enable us to (i) get a better understanding of our suppliers, (ii) better assess the level of modern slavery risks in our supply chain, and (iii) scrutinise with greater ability the actions being taken by our suppliers to identify and tackle such risks, an internal guidance document has been implemented called "*Supplier Selection and Purchasing*" which incorporates various processes relating to supplier selection and management amongst other matters. This guidance specifies mandatory due diligence that must be carried out on all new suppliers and which includes a requirement that suppliers who are engaged by the Group and performing services for us must provide various policies and statements to the Group for review, including their modern slavery policy and statement. In the alternative, suppliers must agree in writing to adhere to the Group's Supplier Code of Conduct (the "**Code**"). The Code makes it clear to suppliers that the Group is committed to ensuring that

slavery, human trafficking and child labour is not taking place in any part of its business or supply chain. Suppliers must therefore agree, by signing and returning the Code, to (i) comply with all relevant legislation, regulations and directives (including the UK Modern Slavery Act 2015 and its reporting obligations) in the countries and communities in which the supplier and its supply chain operates; (ii) provide clear, documented and uniformly applied disciplinary and grievance procedures, including prohibiting mental, physical or verbal abuse; and (iii) ensure fair compensation and provide at least wages that meet legally mandated minima without unlawful deductions.

The Group's People & Performance (HR) and Risk & Compliance teams are primarily responsible for dealing with any risks or concerns raised by the business in relation to modern slavery. These teams are central Group functions, whose leaders form part of the Group's Executive Management Team.

Our Values

Trust, Integrity, Innovation, Openness, Respect and Inclusion: these are the values that underpin the culture at Autovista Group. These values are core to all that we do as a business and they set the tone for how we treat each other, our customers, suppliers, stakeholders and third parties. We talk in detail about our values and how they are reflected in practice on our [corporate website](#) and we have a page on our Group's staff intranet dedicated to our values.

We hold these values as critically important in how we run our business, and to reinforce that, we recognise employee behaviours which are aligned to our values through our "Cheers for Peers" page on our Group's staff intranet and we also use rewards schemes to recognize employees who have gone above and beyond to demonstrate our values.

Due to the critical importance of our values to the running of our business, we commenced the delivery of a refreshed version of our manager training program in 2022 in order to further embed our Group values into the practices and conduct of our managers. This training is mandatory for all people managers across the Group and introduces a new leadership competency framework which specifically references our anti-slavery and human trafficking policy within the "*Living our values*" competency expectation of our managers.

Social Audits

In June 2022, EcoVadis, a leader in providing business sustainability ratings, undertook an audit of the Group which included a review of the Group's management systems relating to Environmental, Labour and Human Rights and specifically in the following areas: employees' health and safety; working conditions; labour relations; child and forced labour; diversity, discrimination & harassment; and external stakeholder human rights. As a result of the audit, EcoVadis awarded the Group its Silver Award in recognition of the quality of the Group's various management systems, which places the business among the top 30% of businesses assessed by EcoVadis worldwide.

Awareness

To ensure a foundational level of understanding across the Group of the risks of modern slavery and human trafficking in our supply chains and our business, our anti-slavery and human trafficking policy is available on our Group's staff intranet.

In 2022 we continued to utilise our dedicated Governance, Risk and Compliance ("**GRC**") training program for all employees, run online via our Group's staff intranet (to ensure that materials are readily and easily accessible). The training included a whole module relating to modern slavery and an online assessment to check and consolidate employees' understanding. The training module and the assessment are mandatory for every employee and participation in the training and completion of the assessment are tracked centrally.

We also raise awareness of modern slavery and human trafficking through inclusion in our mandatory employee induction process. This was further highlighted during our 2022 environmental, social and governance ("**ESG**") conference attended by our senior managers.

To continue to promote awareness of our activities in relation to preventing modern slavery externally, we included details of these activities and reference to our last modern slavery statement in our UK group consolidated annual financial statements for the year ended 31 December 2022. We also continue to register our modern slavery statements with the UK Government's modern slavery statement registry to enhance the transparency and accessibility

of our commitment to eliminating modern slavery. Our registration in 2022 for the period 1 January 2021 to 31 December 2021 can be found on the [UK Government's website](#).

Further Steps

We will continue to provide our employees with the necessary training and resources to ensure a commitment to the highest standards of ethical behaviour. To this end, we will be refreshing and providing our GRC training program to all employees throughout 2023. The program will include a module on preventing modern slavery, and, to ensure employee comprehension and understanding, this module will include a follow-up assessment and completion of the training will be tracked.

Our commitment to a sustainable business will be independently verified in 2023 through our reassessment by EcoVadis. Through this assessment, the Group is able to validate its commitment to ethical practices, and we are striving to match or improve our rating each year.

Section 54(1)

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022. This statement has been authorised and approved by the board of directors of Autovista Bidco Limited.

Signed:

Authorised signatory, for and on behalf of Autovista Bidco Limited

Date: 26/06/2023