

Modern Slavery Statement

November 2023

Document Control

Document Name	Modern Slavery

Summary Changes

Version	Version Date	Nature of Change	Reviewed by	Next Review Date
1.0	November 2023	Not applicable	James Wilkinson, Chief Executive Officer & The Board	November 2024

Document Owner(s)

Title	Department
James Wilkinson, Chief Executive Officer	Leadership

Document Change Approvers

Title	Department
The Board	The Board

Overview

In compliance with the Modern Slavery Act 2015, this statement details the measures taken by Zuto Limited (Zuto) during the financial year ending in June 2023 to mitigate the threat of Modern Slavery and Human Trafficking (MSHT) in both our company and our supply chains.

Zuto has a zero-tolerance approach to modern slavery and does not use, support, or engage with any form of forced, child, or involuntary labour in any part of our supply chain. We comply with the Modern Slavery Act 2015 and any other relevant anti-slavery and human trafficking laws and regulations.

Our Business

Zuto Ltd is an FCA authorised motor finance broker that specialises in securing vehicle finance for our customers by finding them the best finance options for their specific needs and financial situation in an easy and simple way. As of November 2023, Zuto employed c.450 full-time employees.

Zuto is a certified B Corporation. Our B Corp accreditation is a demonstration of Zuto's commitment to meeting the highest standards of social and environmental performance, demonstrating accountability and transparency on factors from employee benefits and business practices to charitable giving. We have proudly held B Corp status since March 2022.

Zuto operates solely within the UK and is made up of the following companies:

- Zuto Limited (Company number 05722976) through which we provide our vehicle finance credit broking and insurance broking services.
- Zuto Holdings Limited (Company number 08563366) which is our ultimate parent company.

Zuto's supply chains include a wide range of suppliers of goods and services including our lenders, lead generation sources, IT software, professional services, and office consumables.

Risk Assessment

As we operate solely within the UK and given the nature of our business as a motor finance broker, we believe the opportunity for modern slavery to occur either within our business or our supply chains to be low. Furthermore, as we are not a manufacturer of physical products, we do not rely on manual labour or overseas outsourcing of production within our operations. Zuto is dedicated to creating a safe workplace environment ensuring that we minimise the risk of MSHT within both our organisation and our supply chains.

We use all reasonable efforts to avoid causing or contributing to adverse human rights impacts that may arise from operations, products, services and/or business relationships. Where any risk of MSHT occurring is identified, we will conduct a detailed risk assessment and will act diligently to help mitigate/remediate any impact that may occur.

Supply Chain Due Diligence

As part of our contract approval process for onboarding all new prospective partners, Zuto undertakes due diligence and gives active consideration to the practices, procedures and controls of any partners to ensure that they are reputable businesses who evidence the right values in line MSHT requirements.

We also have an enhanced ongoing annual due diligence approach for our lender and lead generation partners which includes consideration of their MSHT practices and policies and agreeing contractual obligations which include industry standard terms to ensure they meet the requirements of Modern Slavery legislation and Zuto's minimum standards.

Policies Relating to MSHT

MSHT forms part of our overall Governance and Risk Management Frameworks. Our policies and procedures are designed to ensure that we conduct our business ethically and responsibly towards our customers, employees, and suppliers. To enable us to do this, we maintain a suite of policies which help mitigate the risk of MSHT, either directly within our operations or through our supply chains. These policies are reviewed on an annual basis to ensure that any new legislation and regulations are incorporated. Relevant policies include:

- Recruitment & Selection Policy
- Bonus, Overtime, and Commission Policy
- Employee Code of Conduct
- Equal Opportunities Policy
- Whistleblowing Policy
- Contract Approval Process
- Anti-Money Laundering & Anti-Bribery Policies

We also offer enhanced support to all employees through our Wellbeing Network, Mental Health First Aiders, and Employee Assistance Programme initiatives.

Training Relating to MSHT

Our suite of policies is supported by a framework of mandatory and tailored training to ensure awareness of key risks across the organisation. As part of our training, we encourage all employees to raise concerns of any wrongdoings as part of our ongoing supportive culture of doing the right thing.

Ongoing Monitoring and Our Continued Commitment

As part of our ongoing oversight of the effectiveness of our modern slavery controls, we will continue to ensure the following:

- Annual review of all policies and training material/performance;
- Ongoing due diligence of all third party partners;
- Consideration of key MSHT risks as part of our risk management framework;
- Monitoring % of employees who have completed and passed required annual training refreshers.

Whilst we have had no incidents of slavery or human trafficking within our organisation and are not aware of any incidents occurring within our supply chain, we remain committed to improving our controls and processes where we identify opportunities for these to be enhanced.

This statement in relation to the Zuto's 2023 financial year was approved by the Board of Directors of Zuto Limited on 21 November 2023.



James Wilkinson
Chief Executive Officer