

# Hippo Motor Group

## Modern Slavery Statement March 2023

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, 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.

Hippo Motor Group have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Hippo Motor Group's primary protection against slavery is to ensure that all business activity complies with minimum wage legislation. Hippo Motor Group also requires this of its contractors. Hippo Motor Group's first line of defence against human trafficking is to ensure that all employees have the right to work in the UK. Hippo Motor Group also requires that UK contractors only employ staff with the right to work in the UK.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners however, due to the breadth of our businesses and supply chains Hippo Motor Group is not in a position to check every business relationship and avenue. The principal areas at higher risk of human trafficking and slavery are those related to our supply chains, in particular cleaning services, Valeting and Uniform suppliers.

Hippo Motor Group sources and sells products and parts from a broad range of national and international suppliers. Our supplier and contractor approval process incorporates a review of the controls being undertaken by the supplier. To ensure that external supply chains comply with this policy Hippo Motor Group requires that the business practices and supply chains of each supplier are in accordance with Hippo Motor Group's principles and monitors compliance by suitable levels of due diligence according to the level of risk which Hippo Motor Group assesses of the potential for human trafficking and/or modern slavery.

Due diligence is monitored via an onboarding process with all suppliers. A list of all suppliers is checked and assessed annually. The process includes obtaining confirmation they comply with Modern Slavery Obligations.

Any instances of non-compliance of which Hippo Motor Group is made aware will be assessed on a case-by-case basis. Remedial action will be taken and tailored to suit the circumstances. Hippo Motor Group will only trade with those who fully comply with this statement or those who are taking steps towards full compliance. If Hippo Motor Group is not satisfied with the steps being taken towards full compliance, it will temporarily suspend its business with that supplier (to the extent permitted under contract or by law). The ultimate sanction for the continual failure to comply will be for Hippo Motor Group to cease to trade with that supplier (to the extent as permitted under contract or by law).

Hippo Motor Group will quickly and thoroughly investigate any claim or indication that any area of its business or supply chains is engaging in human trafficking or slave labour.

Any such claim coming to the attention of personnel within Hippo Motor Group should be reported to senior management in accordance with our Whistleblowing Policy. The director will be informed of the issue including the findings and outcome of the investigation.

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The effectiveness of the steps taken to ensure that slavery and or human trafficking is not taking place within the business or supply chain is based on not receiving reports from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified. KPI's used would number of concerns raised internally or externally, as well as any issues highlighted from our onboarding/annual due diligence.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The HR manager/Compliance has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR manager.

### COMPLIANCE WITH THE POLICY

You must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or HR manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or the Compliance/HR Manager or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Compliance/HR manager.

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We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in our Company handbook or on the internal website.

### COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This statement has been approved by the Director of Hippo Motor Group, Thomas Preston, and it will be reviewed and updated as necessary on an annual basis.