

## **MODERN SLAVERY ACT 2015 (ACT) s.54(1) STATEMENT**

### **Introduction**

Modern Slavery refers to the deprivation of fundamental human rights, including freedom from forced labour and the right to liberty, for the purpose of personal or commercial gain. It is an abhorrent crime that affects the world's most vulnerable people. At Inchcape we embrace, support and respect the human rights of everyone we work with. We do not use, or accept, forced, bonded or involuntary labour or child labour. We only employ people who choose to work freely and respect their rights to equal opportunities and freedom of association.

### **Our operations and supply chains**

Inchcape plc and its subsidiary companies ("Inchcape", "we", the "Group") is a leading global automotive group, operating in 40 countries with a wide portfolio of OEM brand partners. In the countries where Inchcape acts as a retailer, we have diversified multi-channel revenue streams including sale of new and used vehicles, parts, service, finance and insurance. Where Inchcape operates as a distributor for our OEM brand partners, we undertake services including product specification, import and logistics, dealer network management, sales and marketing.

The Group's principal suppliers are global automotive manufacturers, which supply vehicles and parts. In addition, Inchcape offers finance and insurance products to its customers and engage other suppliers to provide goods and ancillary services.

### **Our approach to Modern Slavery**

Our colleagues have access to a number of information sources that act as a guide to Modern Slavery which provides a guide to ethical business conduct and the minimum standards of behaviour expected of our colleagues and suppliers. This includes Colleague Code of Conduct, Supplier Code of Conduct, Group Risk Management Policy & Guide. Colleagues and suppliers are expected to comply with the Code at all times.

We are committed to providing appropriate pay, benefits and terms and conditions of employment and to seeking agreement for changing these, where required, to meet business objectives.

Wherever we do business, our colleagues are required to comply with all applicable laws, rules and regulations including any local legislation on Modern Slavery. The general terms and conditions state that suppliers shall comply with all applicable laws, regulations and actions relating to modern slavery and human trafficking, including but not limited to the Modern Slavery Act 2015.

### **Our assessment of modern slavery risk**

The vast majority of our direct supply comes from organisations that are, themselves, required to publish statements setting out the steps that they have taken in this regard. We have reviewed those statements, where available, and will continue to do so periodically. We are satisfied that our major suppliers are taking appropriate actions to effectively manage and mitigate the risk of modern slavery in their supply chains.

Whilst we consider that the remainder of our supply is generally at low risk of exposure to modern slavery and human trafficking, our Global Procurement Policy, Risk Management Policy and Risk Management Framework takes account of potential increased modern slavery (and anti-bribery) risks. The Policies and general terms and conditions set out that where such increased risks are highlighted, supplier evaluation and due diligence shall be performed proportionate to the risk identified.

We recognise that ethical and productive partnerships with our suppliers strengthen our business, our reputation and that of our OEM brand partners. We treat our suppliers fairly and with respect, and we expect them to know and to agree to uphold our high standards of compliance and ethics.

We expect our employees to act diligently when selecting suppliers and suppliers are required to work in compliance with the Inchcape Supplier Code of Conduct, contractual terms and conditions and within the guidelines / policies that have been established by their business and to always base their selection decisions on objective criteria such as value received, quality, price and service.

### **Modern slavery training**

Our procurement teams across Inchcape have received modern slavery training as they often have contact with suppliers and third parties who provide goods and services across our business. The training enables colleagues to know what signs to look out for, recognise key risks to the Company and how we could be implicated, and to take appropriate action to manage the risks, and tackle modern slavery and human trafficking. Key "red flags" have been identified to assist the procurement teams in recognising possible signs of slavery or human trafficking and guidance produced so that they are fully aware of the need to avoid contracting with suppliers who contravene the Act.

### **Reporting issues**

In addition to the reporting of Modern Slavery Risks in the Procurement process, we provide our employees with a confidential, independent whistleblowing hotline and website via Naxex's Ethics Point portal that they can access 24/7 365 days of the year if they have any concerns or suspect any wrongdoing. Such concerns are investigated promptly and impartially.

### **Our plans for the next 12 months**

Our achievements in the last financial year:

- Modern Slavery training refresher for procurement teams

Our Plans for the next financial year:

- Carry out a more detailed analysis of the supply chain to ascertain which categories/regions are considered high-risk
- Agree further due diligence action plan for any high-risk suppliers identified

This is the 6<sup>th</sup> version of Inchcape's Modern Slavery Statement and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ended 31 December 2022. This statement relates to Inchcape plc and its UK entities, including Inchcape Finance plc, Inchcape Management (Services) Limited, Inchcape Retail Limited and Inchcape Estates Limited.

Approved by the Board of Directors of Inchcape plc on 21 March 2023.

**Nigel Stein**  
Chairman  
Inchcape plc