



Modern Slavery: Our Slavery and Human Trafficking Statement FY2024/2025

This statement, published in accordance with provisions of the Modern Slavery Act 2015 (the “Act”), sets out the policies, processes, and actions we have taken during the financial year ended 30 September 2024 to prevent modern slavery in our businesses and supply chains. It is intended to cover all the business and undertakings of National Car Parks Limited (“NCP”).

At NCP, we are committed to conducting business responsibly and have a zero- tolerance approach to all forms of modern slavery across our operations. We are committed to ensuring everyone who works for NCP does so in an environment where fundamental human rights are upheld, and we expect anyone that we do business with also upholds these principles as well. We are continuously working to improve our operations in practice to reflect that expectation.

1. Our Business

NCP is the UK’s largest and longest-standing private car park operator. We operate more than 500 car parks servicing towns, cities, airports, and railway stations throughout the United Kingdom. To deliver parking services to our customers and clients we employ over 900 people within the United Kingdom.

2. Our Supply Chain

The vast majority of our suppliers are based the United Kingdom. Where they are based outside of the United Kingdom, this small number of our suppliers are based in the following countries: Australia, Gibraltar, the Netherlands, Luxembourg, Tunisia, Ireland, Philippines, Canada, Switzerland, Germany, Spain and the United States of America.

3. Our Values

NCP continues its focus on Kaizen. This is a concept that refers to ongoing and continuous improvement and we apply this within our working culture. The idea is that every small improvement adds up and supports a safer and more successful business in all respects. This is visible in the continuous approach taken by NCP to improve how we identify and address risks within our supply chain and within our work force. Our other core focus is on collaboration and putting yourself in other people’s shoes. These principles encourage us to work together which in turn creates a safer and more open environment. This allows us to more easily pick up on any problems and make changes if necessary.

4. Focus on Wellbeing

Colleagues’ wellbeing is a priority at NCP. Mental health awareness and resilience training is given as part of the training curriculum to ensure all staff are aware of key signs to look out for if colleagues are struggling or where to go to for help. We have dedicated mental health first aiders across the company who colleagues can speak to if they need assistance or someone to talk to. We have also have an Employee Assistance Program



5. Our Governance & Policies

NCP's commitment to human rights and the eradication of modern slavery is shared throughout the business. Our policies support NCP in mitigating risks, both within our business and our supply chain. Responsibility for managing these policies varies policy to policy. However, our annual modern slavery statement is ultimately approved by our board of directors and signed off by our Chief Executive Officers, following a cross-departmental review.

a. Anti-Modern Slavery and Human Trafficking Policy

This statement is reviewed and updated each year, with an updated policy last issued during December 2023. The policy is an internal document that sets out the expectations we, as a business, have in relation to our zero-tolerance approach to modern slavery and human trafficking. It applies to all individuals working in NCP at all levels and grades (whether they are permanent, fixed term, or temporary) and all of NCP's subsidiaries.

b. Whistleblowing Policy

This sets out how NCP is committed to prompting high standards of openness, probity, and accountability. Our whistleblowing policy is available for all staff to view on our intranet, in offices and is communicated annually. It sets out how complaints can be made, including the ability for these to be made anonymously.

c. NCP Code of Ethics Policy

This sets out NCP's expectations on how all colleagues are expected to behave. Colleagues receive a copy of it when joining our business, and an up-to-date version is maintained on our intranet. This is maintained by our HR department. Amongst other things, it requires colleagues to treat each other fairly and not to discriminate on any grounds, to always treat those who raise concerns of misconduct or malpractice in accordance with NCP's whistleblowing procedures and prohibits doing business with countries subject to trade restrictions, embargoes or sanctions. Failure to comply with this may result in disciplinary action.

d. HR Recruitment and Selection Policy

This policy is managed by HR and sets out NCP's commitment to equality of opportunity in recruitment, selection, promotion, and all areas of employment. NCP aims to attract high calibre colleagues by ensuring that our recruitment and selection processes are effective, systematic and equitable. We recognise that colleagues are critical to our success, and the utmost importance is placed on ensuring that a consistent, fair and professional approach is applied throughout the recruitment and selection process. This enables us to employ the best people who possess the necessary skills and attributes, and who demonstrate the behaviours essential to fulfil our strategic ambitions.

NCP will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

NCP regularly review the recruitment and selection policy and all policies related to this such as the equal opportunities and DEI policy to ensure that they are all still fit for purpose.



6. Risk Management & Due Diligence

Part A: Our People

a. Recruitment and Fair Pay

To manage potential risks in relation to onboarding our employees, we ensure all our direct hires are subject to standard “right to work” checks, DBS checks and depending on the nature of the working permits, we may audit these from time to time. We have focused on staff wellbeing and taken steps to ensure all our staff are paid fairly.

b. Changes to our recruitment processes

Our HR department has developed a direct hire talent acquisition model to offer in house end to end recruitment services for our business, and the use of external recruitment agencies will be centralised and managed by a specific Talent Acquisition Term. It is anticipated that this will have many benefits for NCP, including enabling more control and procedures around how staff members will join our business. This will also give more centralised control of ensuring all external suppliers of workers to NCP have appropriate terms in place to protect NCP, and any temporary or contract hire relationships.

c. Training and awareness

Our staff play a key role in mitigating risk(s) both within our business and supply chain, and we recognise that appropriate training and communication is essential. Our Learning and Development Team have been working throughout 2024 to build on our existing training and have launched a new modern slavery training module to all staff to ensure year-on-year improvement in terms of our commitment to identify the risks of, and remove all instances of, modern slavery, human trafficking, and exploitation.

d. Communication

NCP recognises communication is an essential part of raising modern slavery awareness within our business. All of NCP’s policies documents are made available via internal communication channels as well as on our intranet. This statement will be distributed to all staff via internal communication channels following board approval and will be published on NCP’s website.

e. Whistleblowing Hotline

In April 2019, NCP introduced a whistleblowing hotline to help create a culture where staff feel confident in raising concerns safely. It has been maintained since. When all new staff join, they are made aware of the hotline in the onboarding procedure so that all staff are clear that there is a hotline service provided by an independent, external whistleblowing service provider that can be contacted. There are also posters placed in offices and sites to remind colleagues daily and will be included more frequently in internal communications moving forward. Once reports are made, responsible colleagues allocated to this are notified, so that if a report is received an investigation can be conducted and a response given to colleagues who have raised concerns within a specified timeframe.

From November 2024, we have introduced two separate reporting elements to the whistleblowing procedure. For any whistleblowing complaints concerning senior managers and directors these should now be directed to our parent company Park 24 through a separate hotline. This is to ensure that colleagues can raise concerns regarding senior managers and any concerns are investigated consistently throughout the group companies.

Part B: Our Suppliers

Our standard supplier terms and conditions require compliance with all applicable law, and reference compliance with NCP's requirements with regard to modern slavery. We reserve the right to terminate immediately for breaches of these clauses. While our terms may vary between suppliers, our Legal department maintains a guidance note on changes we are able to accept to ensure essential clauses are not removed from our standard terms unless appropriate in that particular instance.

NCP regularly investigates ways it can improve its supplier onboarding and supply chain risk management processes to ensure our Procurement team have access to support and are able to access up to date supplier information and ensuring compliance with NCP's onboarding requirements across the board. NCP procurement team undergo a due diligence process when onboarding suppliers to ensure correctness of all details, as well as adherence to all items set out in the agreed terms and conditions. Details are maintained on finance system and routinely monitored for any updates/ changes that are required. In addition there is a self-service supplier platform that suppliers have access to, which enables them to update their details as and where they require.

7. Measuring and Monitoring Progress

Our modern slavery statement is reviewed annually by colleagues from Legal, HR, Risk and Procurement prior to it receiving Board approval. This is done to ensure we are meeting our ethical and legal obligations and providing up to date information within NCP's statement. This annual review is a great opportunity for us to see how we have performed over the preceding financial year, and how we can look to improve in the current year.

Our performance during the financial year ended September 2024 was assessed by examining the following key performance indicators:

- Number of NCP staff that have undertaken awareness training.
- Number of modern slavery complaints made to our whistleblowing hotline.
- Evidence or suggestion of any material breaches or reasons for concern.

Our goals for the financial year ending 30 September 2025:

- **Audits:** To carry out audits of our suppliers by circulating supplier audit questionnaires containing questions to assess if a supplier is complying with the principles of the Act both internally and within their supply chains. We will also request to see a supplier's policies and procedures on labour standards.
- **Training:** We will roll out specific refresher training on Whistleblowing, so each department understands exactly what it is, their rights and the options available to them.
- **Communication:** New anonymous employee engagement surveys will be circulated to employees. We believe anonymous, company-wide surveys are a useful tool for understanding the wellbeing needs of all colleagues and to better recognised gaps in support they feel is needed.

8. Board approvals

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by our Board of Directors on 10 December 2024.

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Hiroyasu Matsui
Chairman and Director
10 December 2024