

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 involve 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 improving our practices to combat slavery, forced and compulsory labour and human trafficking in our corporate activities, and ensuring that high ethical standards are demonstrated and maintained at all times.

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 data in the automotive industry, including the provision of pricing insights, along the entire lifecycle of a vehicle across more than 20 countries. Autovista, Autovista24, Eurotax, EV Volumes, Glass's, Rødboka and Schwacke are our highly-respected, market-leading brands. The Group has more than 720 employees located in the UK, Europe and Australia and operates as a fully flexible business, allowing our employees full flexibility to decide where (within their country of employment) and when they do their work.

On 1 March 2024, the Group was acquired by the J.D. Power group, a global leader in consumer insights, advisory services and data and analytics.

This statement is made on behalf of the UK parent company of the Group, Autovista Bidco Limited, for itself and each of its subsidiaries. The information contained in this statement was obtained from various key stakeholders across the Group including members from the Group's Leadership, Legal, Risk & Compliance, and People & Performance (HR) teams, and the Group's Head of ESG.

Our Policies on Slavery and Human Trafficking

The importance of acting with integrity and complying with applicable law, including the UK Modern Slavery Act 2015, is reflected in our Group values (see 'Our Values' below). In addition, the Group has various policies in place which are reviewed periodically, to check that they are still current and with a view to increasing their effectiveness, and updated accordingly.

Anti-Slavery and Human Trafficking policy

Our Anti-Slavery and Human Trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships. It emphasises the Group's zero-tolerance approach to modern slavery and requires individuals to notify their manager and either their People & Performance (HR) Partner or the General Counsel in the event of any concerns or suspicions concerning modern slavery. These concerns would then be escalated to the Group's Business Compliance Committee for investigation. The policy also confirms that support and protection will be afforded to those who raise concerns.

Code of Ethics

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. It outlines the Group's commitment to lawful, ethical, and honest business conduct, emphasising integrity, independence, and fairness, and mandates compliance with applicable laws and regulations, including topics such as anti-slavery and anti-bribery. Breaches of the Code of Ethics may have serious consequences, including dismissal or termination of contractual arrangements.

Recruitment standards

We commit to adhering to the following four UN Global Compact labour principles throughout our operations, and refer to these, and other principles and standards such as the International Labour Organisation's Fundamental Conventions, in our Code of Ethics:

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 and are paid at least the minimum wage of their country of employment. Employees involved in recruitment have a full understanding that qualifications, skill and experience are the bases for recruitment, placement, training and advancement of staff at all levels. This is supported by the Group's "Hiring Manager Toolkit" which is accessible to those involved in recruitment. The toolkit provides guidance on fair and consistent recruitment selection processes and a mechanism to support objective evaluations during recruitment. We undertake right to work checks in accordance with local requirements on all employees prior to them commencing their employment and this includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work. We also make employment contracts available to all employees stating the terms and conditions of service (including appropriate termination rights), which are in languages easily understood by them.

Whistleblowing policy

All staff who have any concerns that modern slavery, or any other wrongdoing, may be occurring in any part of our organisation or supply chains are encouraged to notify senior management so that the issue can be escalated appropriately and investigated effectively. We have processes and policies in place to protect whistleblowers and their anonymity. The Group also has an anonymous whistleblowing application in operation, which is a simple, secure, anonymous and confidential way in which staff can communicate misconduct (or suspected misconduct), including in relation to modern slavery matters. There are links to the whistleblowing application in various places on the Group's staff intranet, including the homepage, and in the Group's Whistleblowing policy itself. In accordance with this policy, staff can also raise concerns with our People and Performance (HR) Team or the General Counsel in confidence to discuss any wrongdoing. No reports were made in 2024. We also periodically host employee forums, which promote transparency and offer employees another route to raise any concerns they may have.

Policy accessibility

All of our policies, including those mentioned above, are available on the Group's staff intranet. This ensures that (i) they are readily and easily accessible by all of our employees, and (ii) the prevention of modern slavery from occurring within the Group's business and its supply chain is

embedded as standard practice. All Group employees are required to have a good understanding of the English language, and consequently, all policies, documents and communications are primarily in English, with some also in local languages where necessary. When employees need to be notified about significant changes or updates to the Group's policies or processes, one of the methods used to alert employees is the Group's staff intranet.

Our Supply Chains

The Group sources data, including market observations, for its products from a variety of reputable data suppliers, such as vehicle manufacturers, car portals, auction houses and dealers. 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. In some cases (as detailed further below) we review commitments made by our suppliers in their policies and statements. Further, wherever possible, we seek to include appropriate provisions requiring compliance with applicable laws in our supplier contracts, and include specific reference to modern slavery legislation (for example, the UK Modern Slavery Act 2015 or the Australian Modern Slavery Act 2018). The standard provisions were updated in 2024 and stipulate, amongst other things, that (i) suppliers shall take steps to ensure there is no modern slavery or human trafficking in its supply chains or in any part of its business, (2) suppliers must notify the Group as soon as it becomes aware of any actual or suspected slavery or human trafficking in its supply chain, and (iii) the Group can terminate the agreement with the supplier in the event of a breach of these obligations. The terms also include warranties relating to information provided by suppliers in relation to modern slavery matters.

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, the Group's Business Compliance Committee would undertake an urgent and thorough investigation and consider the appropriate action which is to be taken, which could include working with the relevant supplier to ensure that effective measures are implemented to address the issue, or terminating 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 (the "**Framework**") includes a section called "*Supplier Selection and Purchasing*" which incorporates various processes relating to supplier selection and management, amongst other matters.

Supplier Code of Conduct

The Framework includes a requirement that certain suppliers who are engaged by the Group must sign our Supplier Code of Conduct (the "**Code**"), which sets out the standards the Group expects in relation to various matters, including compliance with anti-slavery legislation, regulations and directives and its reporting obligations in the countries and communities in which the supplier and its supply chain operate. In circumstances where the new supplier fails to sign the Code, they are required to provide various policies and statements to the Group for review by the Group's Head of ESG, including their modern slavery policy and statement, to ensure that such suppliers have established processes, procedures and protections in place.

The Group's People & Performance (HR), Legal, and Risk & Compliance teams are primarily responsible for dealing with any risks or concerns raised by the business in relation to modern slavery, which will be escalated to the Business Compliance Committee for investigation and further action, if necessary. These teams are central Group functions, whose leaders form part of the Group's Executive Management Team and Business Compliance Committee.

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.

Due to the critical importance of our values to the running of our business, we have continued the delivery of our updated management training programme 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 our leadership competency framework, which specifically references our Anti-Slavery and Human Trafficking policy. This framework is also publicised on the leadership page of the Group's staff intranet.

Social Audits

In October 2024, 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 Bronze Award in recognition of the quality of the Group's various management systems, which places the Group among the top 24% of businesses assessed by EcoVadis worldwide. In 2024, the Group's overall score remained the same as in 2023, which reflects the Group's dedicated approach to maintaining its business sustainability standards.

Awareness

To ensure that our employees across the Group have a base level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all employees are periodically required to re-read key Group policies, including (amongst others) our Anti-Slavery and Human Trafficking policy, our Anti-Bribery & Corruption policy and our Code of Ethics and sign an acknowledgement form that they have read and understood the contents and requirements of the policies. We are able to track and report on which employees have completed this activity using our HR system and, when the process was last undertaken, all employees in the Group (other than longer term absentees) had signed the form.

We also raise awareness of modern slavery and human trafficking through our mandatory annual Governance, Risk and Compliance training, which is reviewed periodically and which includes a module on preventing modern slavery (the "**GRC Training**"). In 2024, all employees were required to complete the GRC Training within a specified time period. All new starters are also required to complete this training when they join the Group as part of the employee induction process. After finishing the training, employees are required to demonstrate their understanding by completing a questionnaire, which is updated annually, and this is tracked through our HR system. In addition,

our Executive Management team attended training led by external legal counsel in November 2024 covering, amongst other things, ethical business practices.

Employees are notified once the Group's annual modern slavery statement has been published on the Group's website and they are encouraged to read it.

We also included details of how we increased awareness of modern slavery with our employees, and referred to our last modern slavery statement, in our UK group consolidated annual financial statements for the year ended 31 December 2024, and continue to register our modern slavery statements with the UK Government's modern slavery statement registry to enhance the transparency and accessibility of our commitments in relation to anti-slavery. Our registration in 2024 for the period 1 January 2023 to 31 December 2023 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, and employees will be required to recomplete the GRC Training again in 2025, with a refreshed set of questions to check their understanding.

In 2025, we intend to increase oversight of our supply chain by consolidating the information we hold on our suppliers, including acceptance of the Code by suppliers, in order to improve our tracking and reporting abilities, and awareness of any modern slavery risks in our supply chain .


The Group will continue to raise awareness of the prevention of modern slavery among its employees by including a special agenda item on preventing modern slavery in the employee forum meeting which is scheduled for May 2025. The Group's Legal team is committed to ensuring that the Group is aware of any developments in the prevention of modern slavery and will continue to attend relevant training courses and disseminate useful information and guidance.

Our commitment to a sustainable business will be independently verified in 2025 through our reassessment by EcoVadis. Through this reassessment, the Group is able to validate its commitment to ethical practices, and we are striving to match or improve our EcoVadis 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 2024. This statement has been authorised and approved by the board of directors of Autovista Bidco Limited.

Signed:

DocuSigned by:

8765D89938BB444...

Authorised signatory, for and on behalf of Autovista Bidco Limited

Date: 26 June 2025