Modern Slavery Statement

This statement covers the activities of Parkingeye Limited ("Parkingeye") and is our Modern Slavery statement for the financial year ended 31 December 2024 required under the provisions of the Modern Slavery Act 2015 (the "Act").

Modern Slavery in all its forms of slavery and servitude, forced or compulsory labour and human trafficking is a heinous crime and we will not tolerate any such activities within our own operations or our supply chain. We are committed to stamping out modern slavery and are taking the appropriate steps to ensure that everyone who works for Parkingeye benefits from a working environment in which their fundamental human rights are respected and that our supply chain upholds these principles.

The information in this statement details policies, processes and actions we have taken to ensure that slavery and human trafficking are not taking place in our supply chains or any part of our own business.

Our business and supply chain

Parkingeye provides car park management services and car parking facilities to our clients and users combining our talent, creativity, software, technology and innovation with sector knowledge and proven skills and expertise underpinned by our scaled operational platforms. We provide Car Park Management Services for all sectors: NHS Hospitals and Medical Centres; Retail Outlets, Retail Parks; Supermarkets; Pubs and Restaurants; Hotels; Motorway Services; Transport; Education; Professional and Standalone Businesses; and Leisure and Tourism.

Established in 2004, Parkingeye has grown to become the largest supplier of Automatic Number Plate Recognition (ANPR) systems in the UK.

We were acquired by Macquarie Principle Finance and funds advised by MML capital Partners Group Limited in November 2018. From October 2013 to this acquisition, the Company was part of Capita plc. We are backed by bank and private equity investment and sits within a typical private equity holding company structure. Parkingeye is the primary trading entity and takes responsibility for procurement for the Peggy Holdco Limited group. Our CEO, Philip Boynes, is ultimately responsible for compliance and good practice, supported by the Procurement, Legal, Risk and Compliance, HR, Health and Safety, Operations and Finance Functions and the wider Exec Team who support the business, setting boundaries and standards in driving commercial performance, whilst managing risk and ensuring a strong system of internal control.

Parkingeye has grown each year to the stage where we currently employ well over 350 members of staff based out of our Chorley offices and in the field. Although most of our workforce are recruited on a permanent basis, we use temporary staff within our admin and attendant services teams and use outsourced labour in IT, admin, technical and field operations.

Our key supplies are of data services, ANPR camera and payment machines to support our car park management offering. The majority of our supply relationships are long-standing.

We actively encourage supplier diversity and currently the majority of our supply base are classed as small and medium sized enterprises (SMEs).

Parkingeye has reviewed its processes so that it undertakes relevant checks, (including requiring the details of sub-contracting) on Suppliers, in the onboarding process and thereafter.

When awarding contracts to suppliers following a tender, Parkingeye's procurement team strives to better understand these suppliers by requesting copies of their policies and processes.

Our company policies

The following company policies support us in ensuring that modern slavery is not taking place in our business or in our supply chains or business:

Employee Handbook: Provides a high-level summary of key areas of our policies and standards, providing a framework to ensure our people do the right thing; our stated expectation of our employees includes promoting good working practices. It also provides signposting to the Equality & Diversity Policy, Anti-harassment & Bullying policy, Speak Up Policy, Open Door Policy and Safety, Health and Environment Policy, which go into more detail of our approach in these areas.

Human Rights Policy, Ethical Code Statement and Corporate Responsibility Policy: commits to ensure appropriate procedures are in place to prevent any breaches to international human rights standards, including the United Nations' Universal Declaration of Human Rights (UDHR), the International Labour Organisation (ILO) core conventions on Labour Rights and the United Nations Guiding Principles on Business and Human Rights Procurement Policy: sets out our strategic approach and the key principles and priorities that apply to all Parkingeye's procurement activity ensuring we have control over our external expenditure and effectively manage our supply chain risks, set out our expectations of suppliers in terms of ethical procurement, financial soundness, information technology and data security and governance. It details the due diligence and risk assessment that is conducted on all suppliers ensuring compliance to relevant legislation including the Act.

These policies are available to all employees via our intranet site. The policies are managed by relevant department heads and our risk management framework. Our reporting processes support the escalation of policy issues and management where identified in our business.

Parkingeye has its own internal policy dedicated to Modern Slavery which is readily available to all employees.

Tackling modern slavery – our people

To ensure that we recruit and treat employees fairly, avoiding modern slavery at all costs, our human resources (HR) policies set out our procedures on how we:

- recruit and select employees in a fair, lawful and professional manner, both for internal and external candidates
- treat all employees fairly during their employment and, if there is an occasion when an employee does not feel that they have been treated fairly, there are procedures in place to raise a grievance or involve local trade union or other employee representative, where relevant, or where this is a legal requirement to do so
- manage the exit of an employee from the business in a fair and consistent manner.

We ensure there are contractual obligations to ensure appropriate checks are undertaken by external recruiters.

Our Human Rights Policy details our commitments to labour and workplace rights. We provide fair working conditions for all our employees including terms and conditions of employment, remuneration, working hours, health and safety, resting time, holiday entitlements and benefits.

Our employees' pay will not be lower than that required by law and under 23s are paid the minimum wage for 25 and overs. Hours of work will be in line with the norm within the industry, in accordance with legislation and shall not be excessive. Employees shall not be contractually required to work more than 48 hours per week and overtime will only be worked on an optional basis. Forced or compulsory labour is prohibited. Employees will not be forced into involuntary labour and coercion at work is not acceptable. Financial penalty as a disciplinary sanction is prohibited. The employment models deployed will be in line with specific law and practices. Under these practices there will not be excessive use of alternative models, such as sub-contracting or labour-only contracting.

Employees can raise ethical concerns through our Open Door Policy and Speak Up Policy. Concerns about slavery and human trafficking would be considered to be an ethical concern and employees can raise these concerns openly and at any time in confidence.

In addition to this, we seek feedback from employees where we gauge how our people feel about working at Parkingeye. This enables managers to identify potential issues around culture that could lead to a failure of ethics, controls or governance before they occur. Slavery and human trafficking would be picked up as a potential issue through this assessment.

Tackling modern slavery – our supply chain

We seek to partner with suppliers who uphold our high standards of social, environmental and ethical conduct in providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically, and using environmentally responsible practices where practicable.

Analysis of our supply chain suggests that almost all of it is UK based. Given the robust UK legislative framework, the risk of infringement by our suppliers is low. Nevertheless, we recognise our responsibility to identify and address potential infringements linked to the goods and/or services we procure.

We recognise the following areas of procurement as presenting a greater risk of Modern Slavery: workers sourced via third party agencies and outsourced providers, as part of HR procurement; the outsourcing of IT development work to a third-party resource in Poland; and technical and business operations admin workstreams to a third-party business utilising resource in India. We are putting in place a due diligence toolkit for outsourced labour to help us manage these higher risk areas.

Parkingeye's procurement team works with colleagues and suppliers to ensure that all necessary due diligence checks are undertaken. If risks are identified during our due diligence, we work with suppliers to address them. Once a supplier is approved, we assess their record on human rights and social and environmental issues as an ongoing task.

All suppliers are expected to comply with our Supplier Standards set out within Parkingeye's Procurement Policy.

How we are reducing our HR risk

Risk is minimised by utilising our own in-house recruitment capability as the first option. Otherwise, where recruitment is outsourced, we only use reputable smaller agencies with appropriate accreditation and always verify the practices of any new agency we are using before accepting workers from that agency This ensures the risk in using an agency is kept low.

We operate self-assessment checking with all third parties and audit, if risk is highlighted. Where self-assessment leads to matters being disclosed that cause us concern, we would audit that supplier and that procurement (or the continued supply) would be paused for that process to be completed and the results evaluated.

How we are reducing supply chain risk

We have established an internal auditing process for the continual due diligence review of our existing supply chain and this includes checks on financial stability, health and safety and Modern Slavery compliance.

KPI analysis

As a Car Park Management business, we strive for greater efficiency and use our expertise in technology and talent to drive continuous improvement. Where we ask the business and our supply chain to do more with less, we also strive for them to do this in a smart way, so we don't compromise on our legal or ethical obligations.

Training and communication

To make employees aware of the Act and the drivers and possible indicators of Modern Slavery, we are putting in place a new training and awareness-raising programme, and all staff are required to attend a Modern Slavery training module via our staff online learning platform. We provide access to relevant policies on the company's intranet and share this statement with all employees through our internal communication channels and publish a copy of this statement on the Parkingeye website (www.parkingeye.co.uk). Our procurement team and HODs are aware of the Act and our associated due diligence processes and we will be raising the profile of the issue of modern slavery and how employees, intermediaries and suppliers can combat it within the business or our supply chain. Reporting on the efficacy of this policy is made to the Company's board.

Plans for the next year

We will maintain effective and continued focus on employee awareness of our processes and how we expect employees to conduct business responsibly We will place an emphasis on treating people fairly and equally, acting lawfully and we will highlight the avenues and tools available to enable ethical concerns to be raised.

This statement is made pursuant to s54(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 was approved by the Board of Parkingeye Limited.

Philip Boynes, CEO

February 2025