### INTRODUCTION FROM THE MANAGING DIRECTOR

We are committed to improving our practices to combat slavery and human trafficking.

### **STRUCTURE OF ORGANISATION**

We are a provider of vehicle rental services and mobility solutions. Europear Group UK Limited is the main operational entity in the UK. It is a wholly owned subsidiary of Europear UK Limited. All of the UK companies are ultimately owned by Europear Mobility Group., S.A., which is a French-registered company with headquarters in Paris.

The UK Group has its head office and rental stations/trading locations in the UK and operates in the corporate and leisure markets.

The Europear Mobility Group, as a whole, has an annual worldwide turnover (including subsidiaries) of at least £36 million.

### **OUR BUSINESS**

Our business is organised into seven functions: Finance, Fleet, Revenue and Capacity Management ("RCM"), Human Resources, Legal, Operations and Sales and Marketing.

### **OUR SUPPLY CHAINS**

Our supply chains include sourcing vehicles from vehicle manufacturers and general purchasing supply contracts, e.g. vehicle valeting services, outsourcing contracts, vehicle supplier subcontractors, agencies and franchisees.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

# DUE DILIGENCE AND RISK ASSESSMENT PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we:

- have policies in place to ensure that suppliers and subcontractors are capable of meeting our requirements, through stringent supplier take-on procedures; and
- strive to build longstanding relationships with suppliers and subcontractors and make clear our expectations and values.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Encourage employees and contractors to report instances of non-compliance or concern and to protect whistle blowers, by way of a confidential and secure online reporting portal.

### SUPPLIER ADHERENCE TO OUR VALUES

We have a robust approach to combatting slavery and human trafficking and we expect all those in our supply chains and contractors to comply with our values. To do this, we have in place a supply chain compliance programme. This consists of including general compliance provisions in supplier contracts where appropriate. We also require all suppliers to provide us with a copy of their Modern Slavery policy. However, there are cases where some organisations, typically small businesses, do not have one. In these instances, we provide a copy of our own Modern Slavery and Human Trafficking policy and require suppliers to sign an agreement that they will comply with it as if it was their own policy.

We have a dedicated compliance team, which consists of involvement from the Legal and Human Resources functions.

If any concerns or areas of non-compliance are highlighted anywhere in the business, these will be reported to the Board of Directors and/or the Compliance Officer.

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we sourced and delivered a professional training course to members of the senior management team, as well as senior operations directors and all members of staff who have regular contract with our supply chain partners as part of their role. This explained the key elements of human trafficking and modern slavery, as well as signs to look out for and how to deal with any suspected incidence of human trafficking and modern slavery. At the date of this statement, 98.6% of employees who were identified as needing to complete the training have completed the module, with a minimum pass rate of 80%. When new employees join in a role for which this training is compulsory, they are required to complete the module within the first 30 days of their employment with Europcar. Enrolment onto and completion of the training is monitored by our Training and Development team, as well as nominated colleagues within each business unit and the Senior Management Team.

Alongside completion of the training module by new employees, the key messages will be cascaded to station managers by way of a briefing note so that they are aware of and understand the basic principles in this area.

### OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicator (KPI) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

• Completion of stringent new supplier take-on procedures by our Non-Fleet Procurement Team and individual business areas, including logging of all non-conformances.

Our records show that there have been no actual incidences (or suspicions of incidences) of human trafficking or modern slavery of which we became aware in our supply chains during the year ending 31 December 2023.

### AREAS FOR IMPROVEMENT

In preparing this statement, we have identified areas which we feel could be improved across the business. These are as follows:

- We will continue to monitor new starters to ensure that all employees who are identified as needing to complete the training module will complete it within their first 30 days of employment.
- We will ensure the key messages from the training module are cascaded to station managers by way of a briefing note so that they are aware of and understand the basic principles in this area.
- We will continue to ensure that where our suppliers and subcontractors do not have their own Modern Slavery policy, we provide a copy of our own Modern Slavery and Human Trafficking policy and require them to sign an agreement that they will comply with our policy as if it was their own.
- We will continue to log all instances of suspicions or actual incidences of human trafficking or modern slavery of which we become aware in our supply chains. This record will help us to spot patterns emerging and assist us in identifying any problem areas.

These actions will be implemented during the course of this year and will be completed by 31 December 2024. This statement 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 ending 31 December 2023. It will be published on the Group's website.

Gary Smith Managing Director EUROPCAR GROUP UK LIMITED

Date: 24 June 2024