

# Human Rights Policy

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# Contents

<b>1.</b>	<b>Introduction</b>	<b>2</b>
<b>2.</b>	<b>Scope</b>	<b>2</b>
<b>3.</b>	<b>Commitment to Human Rights</b>	<b>3</b>
<b>4.</b>	<b>Operational Principles</b>	<b>3</b>
<b>5.</b>	<b>Supply chain management:</b>	<b>4</b>
<b>6.</b>	<b>Your responsibilities and how to raise a concern</b>	<b>4</b>
<b>7.</b>	<b>Training and communication</b>	<b>5</b>
<b>8.</b>	<b>Monitoring, review and approval</b>	<b>5</b>

# 1. Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Motability Operations Group plc and its subsidiaries ("Motability Operations") is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or supply chains. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

The purpose of this policy is to:

- 1.1.1 outline our approach to preventing and addressing the issues of modern slavery in line with the UK Modern Slavery Act 2015 and international human rights standards;
- 1.1.2 set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery; and
- 1.1.3 provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery.

# 2. Scope

- 2.1.1 This policy applies to all persons working for us on our behalf in any capacity at all levels, including employees, agency workers, consultants, contractors (referred to collectively hereunder as "employees"), seconded workers, volunteers, interns, agents, external consultants, third-party suppliers and business partners.
- 2.1.2 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have any relevant contract terminated with immediate effect.

## 3. Commitment to Human Rights

- 3.1.1 As outlined in the UN Guiding Principles on Business, companies have a responsibility to respect human rights. Motability Operations acknowledges that this means acting with due diligence to identify, prevent, mitigate and account for how we address our impacts on human rights to avoid violating the human rights of others. Special attention will be given to the rights and needs of vulnerable groups, such as women, children, indigenous peoples, migrants and individuals with disabilities. We will promptly address any signs of human rights impacts in which we are involved, whether through our own business practices or business relationships.
- 3.1.2 We recognise that human rights due diligence is founded upon a commitment to upholding human rights as established in the internationally recognised standards and guidelines which include, but are not limited to, the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labour Organisation Principles. Motability Operations confirms that it is indeed committed to upholding human rights as established in these internationally recognised standards and guidelines.

## 4. Operational Principles

- 4.1.1 Prevention and Mitigation: We will actively work to prevent and mitigate adverse human rights impacts directly linked to our operations, products, or services through our business relationships. Contract managers will be responsible for ensuring that the requirements of this policy are embedded into our supplier relationships.
- 4.1.2 Legal Compliance: We enforce laws that require respect for human rights and periodically review their adequacy to address any gaps.
- 4.1.3 Guidance and support: We aim to provide guidance to our employees and business partners on respecting human rights, including how to address the risks of modern slavery.

## 5. Supply chain management:

- 5.1.1 We will implement a Supplier Code of Conduct, which sets out clear expectations for our suppliers and business partners to respect human rights and to adhere to the internationally recognised human rights standards and guidelines. Contract managers will be responsible for ensuring the requirements of the Supplier Code of Conduct are understood by our suppliers.
- 5.1.2 We have inserted suitable references into our procurement processes and documentation to ensure we are provided with adequate information about a supplier's commitment to upholding the standards of human rights.
- 5.1.3 As part of our contracting processes, where appropriate, we will include a suitable Modern Slavery clause into key tier 1 supplier contracts where modern slavery has the potential to be more prevalent and/or where the supplier is based in a location where modern slavery is more common, whether it be in relation to adults or children. We expect the same high standards from all of our contractors, suppliers and other business partners and expect them to hold their own suppliers to the same high standards.

## 6. Your responsibilities and how to raise a concern

- 6.1.1 You must ensure that you read, understand and comply with this policy.
- 6.1.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 6.1.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, either now or in the future, you must notify your line manager as soon as possible.

- 6.1.4 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your HR Business Partner immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the procedures set out in our Grievance Policy, which employees can find on MOConnect.

## 7. Training and communication

- 7.1.1 Our commitment to addressing the issue of modern slavery in our business and supply chains will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.
- 7.1.2 Training on this policy will form part of the induction process for all employees and regular update training will be provided as necessary.

## 8. Monitoring, review and approval

- 8.1.1 We regularly monitor our policies and procedures to combat modern slavery.
- 8.1.2 As part of our compliance monitoring plan, we will report annually to our Risk Management Committee on our efforts and progress in addressing modern slavery in our business and supply chains.
- 8.1.3 The board of directors has oversight of this policy to ensure that it complies with our legal and ethical obligations, and that all those under our control comply with it.
- 8.1.4 The Compliance Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and working with internal audit to ensure internal control

systems and procedures are effective in countering modern slavery.

- 8.1.5 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 8.1.6 This policy has been approved by the board of directors and will be reviewed annually to ensure its continuing suitability, adequacy and effectiveness in preventing modern slavery.

Signed:

**Andrew Miller**  
**Chief Executive Officer**  
**Motability Operations Group Ltd**



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