

# Human Rights Policy

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**Motability  
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# 1. Introduction

- 1.1 Human rights are inherent to all people, regardless of nationality, gender, national or ethnic origin, religion, language, disability or any other status. They are globally agreed upon standards of achievement for all people, covering a wide range of independent yet interconnected civil, political, economic, social, cultural, and environmental rights that serve as a “code of conduct” for all human beings.
- 1.2 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 human rights are not being abused anywhere in its own business or supply chains. We align our approach with the UN Global Compact Sustainable Development Goals<sup>1</sup> and are committed to ensuring transparency across our business and supply chain in addressing human rights. Our approach to modern slavery as a salient human rights issue is consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 1.3 The purpose of this policy is to:
  - 1.3.1 outline our approach to preventing and addressing the issues of human rights in line with the international human rights standards and UK Modern Slavery Act 2015;
  - 1.3.2 set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on human rights; and
  - 1.3.3 provide information to those working for and on our behalf on how to identify and report concerns regarding human rights
- 1.4 Motability Operations has a number of internal policies which support and foster its position in upholding human rights. These are reviewed and updated on an annual basis and include:
  - 1.4.1 **Whistleblowing Policy:** This policy seeks to support and encourage all Motability Operations’ personnel to report any concerns relating to misconduct, malpractice or illegal activities without being subjected to any detriment. This would therefore include any concerns regarding human rights and all such concerns are investigated thoroughly and confidentially;
  - 1.4.2 **Disability Confidence Policy:** Disability confidence is a fundamental operating practice for Motability Operations. This policy aims to ensure that personnel with disabilities are not disadvantaged in any way, assisting Motability Operations in ensuring that there are no human rights issues within its organisation;

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<sup>1</sup> <https://unglobalcompact.org/sdgs>

- 1.4.3 **Diversity Policy:** Motability Operations believes it has much to learn and gain from diverse cultures and perspectives and that diversity is an enabler to providing exceptional service to its customers. The aim of the policy is to ensure that diversity values are evident in recruitment and selection, training and development and addressing potential discrimination and human rights issues during employment;
  - 1.4.4 **Modern Slavery Statement:** This statement outlines Motability Operations' approach to preventing and addressing the issues of modern slavery in line with the Modern Slavery Act 2015;
  - 1.4.5 **Supplier Code of Conduct:** Corporate integrity, responsible sourcing, environmental sustainability and the safety and wellbeing of workers are of key importance to Motability Operations. These core principles are reflected in the Supplier Code of Conduct, which establishes the minimum standards and behaviours that Motability Operations expects of its suppliers, including in relation to human rights;
  - 1.4.6 **Procurement Policy:** This policy sets out the principles which must be followed by employees for the procurement of any goods or services. It requires employees to consider the Environmental, Social and Governance ("ESG") and Accessibility standards of a proposed supplier, both of which would include considerations regarding human rights issues.
- 1.5 Motability Operations will engage with key stakeholders in the implementation and ongoing review of this policy including Motability Scheme customers, the Motability Foundation, its suppliers and partners, employees and the communities in which it operates. Key stakeholders will be consulted in its double materiality assessment in spring 2025.

## 2. Scope

- 2.1 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 at "employees"), seconded workers, volunteers, interns, agents, external consultants, business partners and third-party suppliers as further detailed in clause 2.3 below.
- 2.2 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.
- 2.3 We consider our Tier 1 third-party suppliers to be those with whom we have a direct contractual relationship. This will include, but not be limited to, business that supply products or services to us to enable us

to provide the Motability Scheme, such as vehicle dealerships, automotive manufacturers, vehicle parts manufacturers and IT suppliers.

- 2.4 Of our Tier 1 third-party suppliers, we consider any supplier to whom we delegate and/or sub-contract responsibility for delivering (in whole or in part) any of our contractual obligations in respect of our customer contracts to be of key strategic importance. This will include, but not be limited to, insurance, breakdown and hire car providers.

### 3. Commitment to human rights

3.1 As outlined in the UN Guiding Principles on Business<sup>2</sup>, 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 disabled people. We will promptly address any signs of human rights impacts in which we are involved, whether through our own business practices or contractual relationships.

3.2 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<sup>3</sup>, the UN Guiding Principles on Business and Human Rights the International Labour Organisation Principles<sup>4</sup> and the OECD Due Diligence Guidance for Responsible Business Conduct<sup>5</sup> (the “OECD Guidelines”). Motability Operations confirms that it is committed to upholding human rights as established in these internationally recognised standards and guidelines.

3.3 In reference to the OECD Guidelines on Human Rights, Motability Operations will;

- 3.3.1 Avoid causing or contributing to human rights harms and address and remediate such harms when they occur. This includes avoiding detrimental treatment towards people opposing its business activity;

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<sup>2</sup> <https://www.business-humanrights.org/en/big-issues/governing-business-human-rights/un-guiding-principles/>

<sup>3</sup> <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

<sup>4</sup> <https://www.ilo.org/about-ilo/mission-and-impact-ilo/ilo-declaration-fundamental-principles-and-rights-work>

<sup>5</sup> <https://mneguidelines.oecd.org/due-diligence-guidance-for-responsible-business-conduct.html>

- 3.3.2 Help prevent or mitigate human rights harms directly linked to its business even if Motability Operations does not cause or contribute to those harms;
- 3.3.3 Carry out human rights due diligence that takes into account distinct and intersecting risks related to individual characteristics or to vulnerable or marginalised groups;
- 3.3.4 Engage meaningfully with impacted communities and workers, including throughout due diligence. Engagement is “meaningful” if it is ongoing, timely, accessible, appropriate, and safe for stakeholders and if it involves two-way communication, good faith (meaning respect, honesty, and genuine intent to find solutions to the harms), and responsiveness to stakeholders’ views; and
- 3.3.5 Pay special attention to harms to individuals facing heightened risk due to marginalisation or vulnerability, and make necessary adaptations to eliminate barriers for people to engage.

## 4. Salient human rights issues

- 4.1 Salient human rights refers to the rightsholders that are most at risk of severe negative impacts as a result of a company’s activities or contractual relationships. For Motability Operations this includes, but is not limited to, its employees and its suppliers and their employees. These rights are determined by factors such as the scale of harm to individuals, the scope of people affected, the difficulty in remedying the harm, and the likelihood of it occurring.
- 4.2 Motability Operations is the UK’s largest purchaser of vehicles and its sole product is Contract Hire Vehicle Leasing through the Motability Scheme. It has developed its salient human rights issues with reference to the Top 10 Human Rights Priorities for the Automotive Sector<sup>6</sup>, focussing in particular on those salient human rights issues that apply to its role as a Vehicle Lease Operator and excluding those related to the design and production of vehicles. These apply to all procurement activity including, but not limited to, the purchase of vehicles for the Motability Scheme.
- 4.3 Motability Operations most salient human rights are:
  - 4.3.1 **Modern Slavery:** 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.

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<sup>6</sup> [Top 10 Human Rights Priorities for the Automotive Sector | Primers | Sustainable Business Network and Consultancy | BSR](#)

- 4.3.2 **Fair Working Conditions:** Every worker is entitled to a fair and living wage without disparities between people doing the same work. Every worker in the value chain is entitled to working conditions that do not infringe on their human rights. These include reasonable working hours with adequate breaks. Temporary workers should be entitled to the same fundamental rights.
- 4.3.3 **Freedom of Association:** Workers should be free to associate and collectively bargain through independent trade unions or participate in other forms of worker organisation and representation, such as work councils, employee associations, or state-sponsored unions.
- 4.3.4 **Occupational Health and Safety:** Workers' exposure to risks affecting their physical (and mental health) and safety at work, including the dangers of physical injury and mid- to long-term health impacts should be limited and mitigated against wherever possible. These risks extend to the maintenance and repair networks. All workers should not experience workplace violence or harassment, including sexual harassment.
- 4.3.5 **Discrimination:** All workers have the right to not be subject to discrimination in the workplace.
- 4.4 Motability Operations' direct operations are limited to the United Kingdom. It's suppliers and procurement activity can, however, have operations outside of the United Kingdom where human rights abuses have the potential to be more prevalent.
- 4.5 In 2025, Motability Operations will work with its stakeholders, including its Tier 1 suppliers, to conduct a double materiality assessment. As part of this process, it will determine the scale, scope and likelihood of each salient human rights issue identified. Motability Operations will ensure any additional salient human rights issues which are identified as part of this process are captured and added to this policy.

## 5. Operational principles

- 5.1 **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 contractual relationships. Business Owners will be responsible for ensuring that the requirements of this policy are embedded into our supplier relationships with support from the Procurement and Business Risk teams. Motability Operations intends to leverage and influence its suppliers by promoting this Human Rights Policy as its expected minimum standards. Motability Operations will engage with responsible supply chains by enforcing its Supply Code of Conduct and Third Party Risk Management Framework ("TPRM Framework") to conduct supplier due diligence.

**5.2 Due Diligence:** Motability Operations' TPRM Framework is in place to conduct relevant and proportionate due diligence on contractual relationships which deliver products or services into its operation. Our TPRM Framework is aligned to the six-step OECD Guidelines and covers ESG and human rights issues. These six steps are:

- Embed responsible business conduct into policies and management systems
- Identify and assess actual and potential adverse impacts associated with the enterprise's operations, products or services
- Cease, prevent and mitigate adverse impacts
- Track implementation and results
- Communicate how impacts are addressed
- Provide for or cooperate in remediation when appropriate

It sets out a process to define contractual risk in line with Motability Operations' risk matrix and then a process on how to apply, conduct and report upon any relevant risk-based due diligence issues identified. The TPRM then puts a process in place to remediate or conduct additional assurance where required with outcomes being reported at the appropriate level.

**5.3 Procuring Services and Products:** The decision to enter into a contractual relationship to procure services and/or products is based upon a range of factors, including suitability of service/product, commercial viability and supplier due diligence aligned to our TPRM Framework.

**5.4 Legal Compliance:** We enforce laws that require respect for human rights and periodically review their adequacy to address any gaps.

**5.5 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.

## 6. Monitoring

6.1 As part of our compliance monitoring processes, we will review our contract partnerships which are of key strategic importance on an annual basis against this policy and report this annually to our Risk Management Committee. This process will be owned by the Regulatory Risk Manager and supported by the Procurement Manager.

6.2 The Procurement Team and Business Owners have primary day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it. In addition, they aim to work closely with internal audit to ensure internal control systems and procedures are effective in countering human rights abuses.



- 6.3 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 human rights in supply chains.
- 6.4 The Executive Committee 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.
- 6.5 This policy has been approved by the Executive Committee and will be reviewed annually to ensure its continuing suitability, adequacy and effectiveness in preventing modern slavery.

## **7. Supply chain management**

- 7.1 We have implemented and published 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. The Supplier Code of Conduct refers to the process to be deployed by a Supplier upon identification of a breach of the Supplier Code of Conduct. Business Owners will be responsible for ensuring the requirements of the Supplier Code of Conduct are understood by our suppliers.
- 7.2 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.
- 7.3 As part of our contracting processes, where appropriate, we will include a suitable Modern Slavery clause into supplier contracts where human rights abuses have 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.

## **8. Grievance mechanism and access to remedy**

- 8.1 The prevention, detection and reporting of human rights abuses in any part of our business or value chain is the responsibility of all those working for us or under our control.
- 8.2 We aim to encourage openness and will support and safeguard 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 a human rights violation 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.

### For employees

- 8.3 All employees must read, understand and comply with this policy and are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 8.4 Employees are encouraged to raise concerns about any issue or suspicion of human rights violations in any parts of our business or value chains of any supplier tier at the earliest possible stage. If an employee believes or suspects a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes a human rights abuse including modern slavery, either now or in the future, they must notify their line manager as soon as possible.
- 8.5 If any employee believes they have suffered detrimental treatment in response to reporting a human rights issue, they should inform their HR Business Partner immediately. If the matter is not remedied, this should be raised formally using the procedures set out in our Grievance Policy, which employees can find on MOConnect.

### For non-employees

- 8.6 Any non-employees are also encouraged to raise concerns about any issue or suspicion of human rights violations in any part of our business or value chain of any supplier tier at the earliest possible stage.
- 8.7 Whether or not the reporting organisation holds a contractual relationship with Motability Operations, any issue or suspicion of human rights violations should be reported to the email address [humanrights@mo.co.uk](mailto:humanrights@mo.co.uk) at the earliest possible stage.
- 8.8 If any non-employee believes they have suffered detrimental treatment because of reporting a human rights concern to Motability Operations, they should report this to the email address [humanrights@mo.co.uk](mailto:humanrights@mo.co.uk)

## 9. Remediation

- 9.1 In the event of a human rights issue being identified, by whatever means referred to in this Policy, it is vital that the appropriate action is taken to minimise any associated risks.
- 9.2 **Investigation and Risk Assessment:** Together the Regulatory Risk Manager, the Head of Impact and Sustainability, the Procurement Manager and the Head of Business Risk and Compliance will facilitate that an investigation will be started within 24 hours of the issue being identified, where possible. The investigation will establish the nature of the issue identified, which individuals are subject to the human rights

issue and how many are involved. The investigation will perform a risk assessment as to what the consequences of the human rights issue are.

- 9.3 Containment:** Together the Regulatory Risk Manager, the Head of Impact and Sustainability, the Procurement Manager and the Head of Business Risk and Compliance will determine the appropriate course of action and the required resources needed to limit the impact of the human rights issue that has been identified. Advice from experts may be sought if this is deemed necessary and/or appropriate.
- 9.4 Review:** Once the human rights issue has been dealt with as appropriate and contained a thorough review of the event will be undertaken by Business Risk and Compliance to establish the effectiveness of the response and to identify if there are any areas which require improvement. Any recommended changes and procedures will be documented and implemented as soon as possible thereafter.
- 9.5 Record Keeping:** Any reported or discovered human rights issues will be recorded on Motability Operations' Human Rights log and its central Incidents log. This log will record any containment action taken by Motability Operations and details of the subsequent review and its outcomes.
- 9.6 Notification:** The Executive Committee and the Risk Management Committee will be notified of any identified issues at the next scheduled committee meeting, unless it is deemed appropriate to inform the committee before that date.

## 10. Training and communication

- 10.1** Our commitment to upholding human rights in our business and across our supply chain 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.
- 10.2** Training on this policy will form part of the induction process for all employees and regular update training will be provided as necessary.

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

**Motability**  
**Operations**

## Publication schedule

Version	Date	Update	Author	Title
1.0	19/11/24	Original policy	Kim Bradford	Senior Paralegal and Compliance Advisor
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3.0				
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6.0				



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