

## **Motability Operations Group plc and its subsidiaries Modern Slavery Statement 2024/2025**

This statement is made by Motability Operations Group plc and its subsidiaries (“Motability Operations”) pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) for the financial year ending 30 September 2024.

### **Our Business**

Motability Operations exists to deliver smart, sustainable solutions that improve our customers’ mobility in a fast-changing world. We work with Motability, a charity operating as the Motability Foundation, who oversees and sets the strategic direction of the Motability Scheme (“the Scheme”) and provides additional support, such as grants, to disabled people. Through the Scheme, we lease mobility solutions to recipients of the higher rate mobility allowances.

Customers are able to join the Scheme and use their mobility allowance to lease a vehicle, wheelchair accessible vehicle, scooter or powered wheelchair from Motability Operations for either a three or five-year lease. We provide not only the right car for each of our customers’ needs, but the whole worry-free package: insurance, roadside assistance and everything you need to stay on the road.

At the end of the lease, the vehicle is returned to Motability Operations and resold with 100% of profits reinvested into disabled people’s mobility.

### **Supply Chain**

We recognise that the supply chains of companies in the vehicle leasing industry can be complex. As a result, there are several levels of suppliers between the source of the raw materials used in the manufacturing process, the vehicle manufacturers and Motability Operations as the end supplier of each product.

Motability Operations considers its tier 1 suppliers to be those with whom it has a direct contractual relationship. This will therefore include, but not be limited to, vehicle dealerships, cleaning contractors, IT suppliers and Scheme Partners. As a result of the potential number and variety of non-tier 1 suppliers in Motability Operations’ supply chain, it is difficult for us to effectively monitor and manage the modern slavery activities of those suppliers.

Motability Operations is, however, committed to ensuring that its tier 1 suppliers are aware of and comply with the Act. Throughout the last 12 months, therefore, Motability Operations has continued to actively encourage its tier 1 suppliers to monitor compliance with the Act within their own supply chains.

### **Relevant Policies and Processes**

There are a number of internal policies which support and foster continuing compliance with the Act including:

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 slavery and human trafficking and all such concerns are investigated thoroughly and confidentially.

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 is no modern slavery within its organisation.

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 our 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 during employment.

Human Rights Policy: This policy outlines Motability Operations' approach to preventing and addressing the issues of modern slavery in line with the Act and international human rights standards. It provides information to those working for and on behalf of Motability Operations on how to identify and report concerns regarding modern slavery.

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.

All internal policies are reviewed on an annual basis and are available to all personnel on an internal intranet system.

In addition to this, Motability Operations has robust recruitment processes in place.

Direct Recruitment: Motability Operations' Human Resources Department has appropriate procedures in place to ensure that all relevant and necessary checks are completed to confirm a prospective employee has the right to work in the UK before the individual commences work.

Third Party Outsource Provider: Motability Operations uses a single reputable third party outsource provider to facilitate the provision of flexible/agile workforce resources to support specialist business requirements and requires the third party outsource provider to ensure that any flexible resource has the right to work in the UK prior to the commencement of the engagement.

### **Further Steps**

- Motability Operations will implement a Supplier Code of Conduct, which sets out clear expectations for its suppliers and business partners to respect human rights and to adhere to the internationally recognised human rights standards and guidelines.
- Motability Operations has, as appropriate, inserted a suitable Modern Slavery clause into key tier 1 supplier contracts where slavery and human trafficking has the potential to be

more prevalent and/or where the supplier is based in a location where slavery and human trafficking is more common; and

- Motability Operations has inserted suitable references into its procurement processes and documentation to ensure it is provided with adequate information about a supplier's compliance with the Act and commitment to upholding the standards of human rights at the earliest opportunity and prior to a supplier's engagement.

Motability Operations intends to continue with the above throughout the next year to combat slavery and human trafficking in its supply chains.

### **Continuing Commitment**

Motability Operations is committed to not knowingly supporting or doing business with any supplier involved in slavery or human trafficking and expects all of its tier 1 suppliers to impose obligations on their own suppliers, in order to ensure compliance with the Act. With this in mind, we will continue to work closely with tier 1 suppliers to reduce and/or eliminate the risk of modern slavery.

There were no specific modern slavery issues raised across our business in the financial year ending 30 September 2024.

This statement has been approved by the board of directors and will be reviewed and updated annually.

Signed:



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

Date: 19 November 2024