



# MODERN SLAVERY STATEMENT

Cox Automotive



## The reporting entities and the consultation process

### COX AUTOMOTIVE UK

#### CREATING THE FUTURE OF AUTOMOTIVE TODAY

As the world's largest automotive services organisation, we are committed to helping our manufacturer, fleet and dealer customers meet the big, bold challenges of the digital transformation era. Cox Automotive has the broadest, deepest, and most complete view of the used vehicle ecosystem. We connect the wholesale market at every stage of a vehicle's life with physical and digital solutions, insights, and expertise.

We are doing this by making the traditional channels and methods for defleeting and remarketing vehicles more efficient and profitable, while simultaneously developing technologies and solutions that give our customers the ability to operate and compete in an increasingly digital world.

#### OUR GUIDING PRINCIPLES ARE:

**WE LEAD  
BY EXAMPLE**

**WE HAVE  
FUN**

**DO THE RIGHT  
THING ALWAYS**

**WE DO IT ALL IN  
THE SPIRIT OF COX**

**WE BRING OUT THE  
BEST IN EVERYONE**

### THE CONSULTATION PROCESS

This statement applies to the following companies, all of which are subsidiaries of Cox Automotive UK Ltd:

Company Name	Company House ID	Head Office Address
Manheim Ltd.	00448761	Central House, Leeds Rd, Rothwell, Leeds, LS26 0JE
Money4yourmotors.com Ltd.	09413775	
C Walton Ltd.	00559275	

Cox Automotive UK Ltd is part of Cox Enterprises, a group of leading communications, media and automotive services companies. Cox Automotive group is the world's largest automotive service organisation, with solutions that help dealers, manufacturers, fleet companies and leasing firms add value and improve business performance, we are committed to our vision to transform the way the world buys, sells, owns and uses vehicles.

Cox Automotive has integrated the modern slavery requirements into our standard procurement and supply chain processes, and we have communicated and trained out our commitments and expectations regarding modern slavery more broadly within our business. This initiative is in line with one of Cox Automotive's values 'Doing the right thing' and supporting the communities our businesses operate in.

**MODERN SLAVERY STATEMENT**

**STATEMENT ON PREVENTING MODERN SLAVERY**

Modern slavery is a crime which results in the abhorrent abuse of the human rights of vulnerable workers. The company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all its business dealings and relationships. We have implemented systems and controls to ensure that modern slavery and human trafficking are not taking place either within our own business or in any part of our supply chain, in compliance with the Modern Slavery Act 2015. We have published our Modern Slavery Statement on the company’s websites and provide regular refresher training to all employees.

The company expects the same standards from its suppliers, contractors, and other business partners, and as part of its contracting processes includes specific prohibitions against the breach of modern slavery standards: in turn we expect our suppliers to hold their own supply chains to the same standards.

**SUPPLIERS - ETHICAL PURCHASING**

Our Supply Chain is largely UK based with a very small number of services purchased from overseas companies. We have implemented both internal and external purchasing policies to ensure that business standards are integrated through our supply chain. We are committed to obtaining and retaining competitive goods and services whilst also ensuring they are from sources which have not jeopardised human rights, safety, or the environment. We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect and shared ethical values.

We expect our suppliers to adhere to business principles consistent with our own. We expect them to ensure that their products and services are produced and delivered to comply with all legislation relevant to their business: and to ensure they adopt and implement acceptable safety, environmental, product quality, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

We will seek to work with our key suppliers to develop long-term meaningful relations and to improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

**RISK ASSESSMENT AND MITIGATION**

Cox Automotive considers the residual risk of modern slavery in our operation to be low. We understand that modern slavery can happen in any industry and any country and can take any form including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

The PQQ is in effect a balanced score card matrix that measures Risk. In addition, Cox Automotive utilises a spend cube where Karljic spend is identified, which in turn determines the review cycle undertaken by the Cox Automotive Supply Chain team on high frequency and high-risk suppliers, and the following areas of potential risk were identified:

<p><b>Suppliers who are based overseas, particularly where those businesses may be in countries with less robust human rights legislation than in the UK</b></p>	<ul style="list-style-type: none"> <li>• Full PQQ due diligence and based on risk, we may undertake audit at local level.</li> <li>• Right of access included in contracts with suppliers.</li> <li>• Right to terminate contracts in event of any non-compliance.</li> </ul>
<p><b>Agency or contractor workers who may be vulnerable to abuse by their employer</b></p>	<p>Focus on partnership arrangements with good reputation and who are bound contractually to adhere to Cox standards, complete the full PQQ</p>
<p><b>General suppliers who may subcontract their services or purchase from overseas suppliers without ensuring adequate due diligence</b></p>	<p>Full PQQ due diligence for new suppliers – clear contractual obligations to declare subcontracting and to bind such subcontractors to all UK legislation</p>

**COX AUTOMOTIVE POLITICS**

Cox Automotive Human Resources department has documented policies and guidance covering all aspects of legislation which cover employees and their employment with us and provide clear standards for legal compliance.

Cox Automotive Supply Chain has documented its ethical purchasing stance in the aforementioned policy documents, which sets out standards and code of conduct for all suppliers. It is their policy to ensure that thorough due diligence is undertaken across the supply chain to ensure compliance to all UK legislation.

**STRUCTURE**

Cox Automotive operates within the UK and Europe, and has working sites across England, Wales and Scotland comprising a number of companies and brand names, and a small number of team members working in Ireland.

Head Office is responsible for the governance arrangements for all UK sites and is the location for the Human Resources and Supply Chain functions for Cox Automotive. Cox has an established Audit, Risk and Compliance function who report into the European Audit, Risk and Compliance Committee on all matters relating to compliance.

Cox Automotive commits to review annually and publish its Modern Slavery Statement for the relevant business areas under its control to set out the specific actions taken by our company.

## MODERN SLAVERY STATEMENT

### POLICY ON RECRUITMENT, EMPLOYMENT AND HUMAN RIGHTS

Cox Automotive will always recruit the best person for job and will not discriminate on the basis of protected characteristics such as age, disability, gender, gender reassignment, marital or civil partnership, pregnancy and maternity, race, colour, nationality, ethnic origin, religion or belief, and sexual orientation.

Cox Automotive has implemented an Equal Opportunities and Diversity policy and requires its employees to undertake training to understand its core principles, which are to create and sustain a positive working environment where everyone is equally valued and treated fairly with respect and dignity all times.

Cox Automotive will adhere to the following principles in respect of our employees.

- **We will treat all employees fairly and honestly. All employees will have agreed terms and conditions in accordance with legislation and will be given appropriate skills training.**
- **We will pay a fair wage reflecting market conditions and will always meet any national minimum wage.**
- **Working hours shall not be excessive and shall comply with industry guidelines and national standards where they exist.**
- **We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour and have a zero tolerance to modern slavery.**
- **Team members have the rights of freedom of association and collective bargaining. We respect the right of our team members to choose whether or not to join a trade union without influence from management.**
- **We will negotiate in good faith with the properly elected representatives of our employees.**
- **We will abide by the non-discrimination laws where we operate our business.**
- **We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.**
- **We have formal grievance procedures through which staff can raise personal and work-related issues.**

### DUE DILIGENCE PROCESSES

#### EMPLOYEES

Cox Automotive recruitment process includes robust controls to validate the ID of any prospective employee and ensure that they have full Right to Work documentation.

Cox Automotive requires all its employees undertake training to understand its core principles, which are to create and sustain a positive working environment where everyone is equally valued and treated fairly with respect and dignity all times.

Recruitment agencies, where used, are from our Preferred Supplier list and subject to full due diligence by the Supply Chain team.

#### MEASURING EFFECTIVENESS

Cox Automotive has undertaken a full review of our Supply Chain function, including risks, policies, and procedures. As a result, the following improvements in relation to Modern Slavery prevention have been made:

- **Documented Code of Conduct produced for all of Cox Automotive Europe, refreshed and redistributed on an annual basis and includes a specific section on Modern Slavery.**
- **Programme of external supplier audit initiated, going above and beyond Supply Chain checks, supported by the internal Audit, Risk and Compliance team. Audits are targeted based on risk, taking into account location of suppliers, type of product/service being supplied, and spend level.**

#### SUPPLIERS

Cox Automotive has in place a supplier due diligence programme with the implementation of a software-based Pre-Qualification Questionnaire (PQQ). This comprehensive document collects statements against all aspects of compliance, including quality, safety, tax and legal compliance. It is a requirement for a satisfactory PQQ to be completed by a new supplier before any goods or services may be provided.

#### TRAINING, AWARENESS AND REPORTING

Cox Automotive has an online Learning Management System (OLAS) and has sourced a professional training module on Modern Slavery. This has been implemented as a mandatory module at recruitment stage, with a refresher at 2-year intervals. All existing employees have been enrolled on the course and completion rates are monitored.

#### WHISTLEBLOWING

Cox Automotive has a well-established and effective Whistleblowing Policy and procedure for reporting. The business maintains a confidential email box and telephone line which is publicised both through routine training and by workplace posters.

This Statement was approved for and on behalf of Cox Automotive UK by the European Board of Directors on 23/03/2024.

#### MARTIN FORBES

PRESIDENT, COX AUTOMOTIVE INTERNATIONAL