

Modern Slavery Statement

1. Cox Automotive UK – Shaping the Future of Automotive

As the world's largest automotive services organisation, Cox Automotive UK is committed to supporting manufacturers, fleets and dealers as they navigate the challenges and opportunities of digital transformation. With an unparalleled view of the used vehicle ecosystem, we connect every stage of the vehicle lifecycle through a blend of physical and digital solutions, deep market insight and specialist expertise.

We continue to enhance traditional defleeting and remarketing channels to deliver greater efficiency and profitability for our customers, while also investing in innovative technologies that enable them to compete and thrive in an increasingly digital marketplace.

Our culture is grounded in a set of guiding principles: always doing the right thing, leading by example, enabling people to be their best, and making every day count — all carried out in the true spirit of Cox.

2. Scope

Cox Automotive UK forms part of Cox Enterprises, a diversified global organisation operating across communications, media and automotive services. As part of the Cox Automotive UK group — the world's leading automotive services provider — we help manufacturers, dealers, fleet and leasing companies enhance performance and deliver value. Our commitment to transforming the way the world buys, sells, owns and uses vehicles is central to our ongoing strategy.

This statement applies to the following subsidiaries of Cox Automotive UK Ltd for the financial year ending 31 December 2025:

Company Name	Companies House ID	Head Office Address
Manheim Limited	00448761	Central House, Leeds Road,
C Walton Limited	00559275	Rothwell, Leeds, LS26 0JE

Modern slavery requirements are embedded within our procurement and supply chain processes. We have communicated our expectations across the business and delivered associated training to ensure full understanding. This approach is aligned to one of our core values – Doing the right thing – and reflects our responsibility to the communities in which we operate.

3. Our Stance on Preventing Modern Slavery

Modern slavery is a serious crime involving the exploitation and abuse of vulnerable people. Modern slavery encompasses various forms of exploitation including:

- **Human trafficking** - recruitment, transport, or exploitation through force, fraud or coercion
- **Forced or compulsory labour** - work performed under threat or penalty
- **Servitude** - obligation to provide services with no ability to change conditions
- **Debt bondage** - work to pay off debts with exploitative terms
- **Forced marriage** - marriage without consent used for labour or sexual exploitation
- **The worst forms of child labour** - exploitation of anyone under 18 in hazardous work

Cox Automotive UK maintains a zero-tolerance approach to all forms of modern slavery and human trafficking. We are committed to operating ethically, transparently and with integrity across our business and supply chain, in line with the Modern Slavery Act 2015.

We have established systems and controls designed to prevent modern slavery and ensure compliance. Our Modern Slavery Statement is publicly available on our websites, and all team members receive regular refresher training.

We hold our suppliers, contractors and business partners to the same high standards, incorporating clear contractual obligations prohibiting modern slavery and requiring compliance throughout their own supply chains.

4. Organisational Structure

Cox Automotive UK operates across the UK, with sites in England, Wales and Scotland, and a small number of team members based in Ireland.

Our Head Office oversees governance for all UK operations and houses the Human Resources and Supply Chain functions. The Audit, Risk & Compliance function reports directly to the European Board of Directors on all compliance-related matters.

Cox Automotive UK commits to reviewing and publishing this Modern Slavery Statement annually, outlining the actions taken across the relevant parts of the business.

5. Suppliers - Ethical Purchasing

Our supply chain is predominantly UK-based, with limited overseas activity. We maintain internal and external purchasing policies that protect ethical standards throughout our procurement process.

We are committed to sourcing goods and services competitively while ensuring suppliers uphold human rights, safety, environmental responsibility and ethical practices. We seek to build strong and sustainable supplier relationships based on trust, shared values and mutual respect.

Suppliers are expected to meet our business principles and comply with all relevant legislation, adhering to labour, environmental, quality, social and ethical standards in line with our Supplier Code of Conduct. These standards must be upheld throughout their own supply chains.

We work closely with key suppliers to strengthen long-term relationships and improve quality, sustainability and overall performance.

6. Risk Assessment and Mitigation

We assess the residual risk of modern slavery within our business as low-to-medium, due to our pre-assessment and ongoing controls. However, we recognise that modern slavery can occur in any industry or geography and can include trafficking, forced labour, servitude, debt bondage, forced marriage and the worst forms of child labour.

To identify supply chain risks, Cox Automotive UK uses a Pre-Qualification Questionnaire (PQQ) and a Kraljic-based spend cube to determine the frequency and depth of supplier reviews. Our key identified risks and controls include:

Identified Risk	Controls Applied
Suppliers who are based overseas, particularly where those businesses may be in countries with less robust	<ul style="list-style-type: none">• Full PQQ due diligence• Right of access included in contracts with suppliers.

<p>human rights legislation than in the UK</p>	<ul style="list-style-type: none"> • Right to terminate contracts in event of any non-compliance.
<p>Agency or contractor workers who may be vulnerable to abuse by their employer</p>	<ul style="list-style-type: none"> • Focus on partnership arrangements with good reputation and who are bound contractually to adhere to Cox standards • Full PQQ diligence • Requirement for staff to have visible ID and verified work permits • Preference for directly employed teams over agency workers • Cox Automotive UK Whistle Blow function open to suppliers as well as Team Members
<p>General suppliers who may subcontract their services or purchasing from overseas suppliers without ensuring adequate due diligence</p>	<ul style="list-style-type: none"> • Full PQQ due diligence for new suppliers – clear contractual obligations to declare subcontracting and to bind such subcontractors to all UK legislation • Audits of suppliers and any subcontractors
<p>Supplier non-adherence to stipulated control measures</p>	<ul style="list-style-type: none"> • Based on risk, we may undertake audit at local level via the Cox Automotive UK Audit, Risk & Compliance Team, on a regular basis for high-risk partners, or an ad-hoc basis should any issues or concerns arise. • Right of audit built into supplier contracts

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| | <ul style="list-style-type: none">• Right to terminate built into supplier contracts |
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7. Cox Automotive UK Policies

Our People Solutions function maintains policies covering all aspects of team member rights, legal compliance and expected standards of behaviour.

Our Supply Chain function maintains ethical purchasing policies and a Supplier Code of Conduct, ensuring robust due diligence and adherence to UK legislation throughout the supply chain.

8. Policy on Recruitment, Employment and Human Rights

Cox Automotive UK recruits based on merit and does not discriminate on the basis of protected characteristics. Our Equal Opportunities and Diversity policy supports a working environment where everyone is valued, respected and treated with dignity.

We commit to:

- Treating all team members fairly, with legally compliant terms and appropriate training
- Paying fair wages and meeting national minimum wage requirements
- Ensuring working hours comply with legal and industry standards
- Prohibiting illegal child labour, forced labour, bonded labour and coerced overtime
- Supporting freedom of association and collective bargaining
- Negotiating in good faith with elected representatives
- Enforcing non-discrimination laws
- Prohibiting corporal punishment, coercion or abuse
- Maintaining formal grievance procedures

9. Due Diligence Processes

Team Members

Our recruitment processes include strict identity checks and Right to Work verification. Training on equality, respect and working practices is mandatory for all team members. Recruitment agencies used by Cox Automotive UK are selected from our Preferred Supplier List and undergo full due diligence.

Suppliers

We require all new suppliers to complete a satisfactory PQQ before providing goods or services. PQQ completion is refreshed on a regular basis to ensure ongoing compliance.

This software-based assessment reviews compliance across quality, safety, tax, legal and ethical standards, including specific questions on:

- Employment practices and worker rights
- Subcontracting arrangements and supply chain visibility
- Previous compliance issues or investigations

Existing suppliers are subject to:

- Regular PQQ refresh for strategic/high-risk suppliers
- Contract review clauses allowing Cox Automotive UK to audit compliance
- Immediate re-assessment if concerns arise from any source

10. Measuring Effectiveness

Cox Automotive UK regularly reviews supply chain risks, policies and procedures, and has made the following improvements:

- Increased auditing capacity, enabling more external supplier audits beyond standard Supply Chain checks, supported by the Audit, Risk and Compliance team.
- Targeted, risk-based audits based on supplier location, service type and spend.
- Regular publication and refresh of the Cox Automotive UK Europe Code of Conduct, including dedicated modern slavery guidance.

11. Training, Awareness and Reporting

All team members must complete mandatory Modern Slavery and Whistleblowing training modules via our Online Learning and Assessment System (OLAS). These are undertaken at induction and refreshed every two years. Completion rates are monitored to ensure compliance.

12. Whistleblowing

We operate a robust Whistleblowing Policy and reporting framework, supported by confidential email and telephone channels.

Reporting mechanisms are communicated through:

- Induction & Regular refresher training (available in multiple languages)
- Workplace posters at all sites
- Intranet content

13. Continuous Improvement

Cox Automotive UK recognizes that preventing modern slavery requires continuous improvement and adaptation to emerging risks. For the coming year, we commit to:

- Implement a new and improved supply chain segmentation / category identity process which will enhance our process on top of our current use of the Kraljic model
- Increase supplier audit program by 30%, focusing on identified high-risk categories
- Achieve 100% completion rate for mandatory training

We will report on progress against these commitments in our 2027 Modern Slavery Statement.

Statement Approval

This Statement was approved on behalf of Cox Automotive UK by the European Board of Directors on 9th March 2026.

Martin Forbes,

EVP & President International