



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

Cox Automotive 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 and its subsidiary businesses are reporting entities under the Modern Slavery Act 2015.

Cox Automotive has taken an integrated approach to addressing modern slavery risks. There has been significant consultation and collaboration between our people to prepare this Statement, including within the People, Finance, Risk, Legal and Supply Chain functions. We have also communicated and explained our commitments and expectations regarding modern slavery more broadly within our business, and we intend to enhance that communication even further in the future. This initiative is in line with one of Cox Automotive’s values ‘Doing the right thing’ and supporting the communities our businesses operate in.

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. Our Head Office address is Central House, Leeds Road, Rothwell, Leeds LS25 OJE.

Cox Automotive 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 Audit, Risk and Compliance Committee on all matters relating to compliance.

Cox Automotive commits to review annually and publish its Modern Slavery Statement to set out the specific actions taken by our company. The following entities are required to publicly report:

- **Manheim Limited**
- **Money4yourmotors.com Limited and We Want Any Car Limited**
- **C Walton Limited**

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 UK 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.

Regular review is undertaken by the Cox Automotive Supply Chain team on high frequency and high-risk suppliers, and the following areas of potential risk were identified:

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

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.

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.**

MODERN SLAVERY STATEMENT

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.

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, 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.

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 5th December, 2022.

MARTIN FORBES

PRESIDENT, COX AUTOMOTIVE INTERNATIONAL

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**
- **Programme of external supplier audit initiated, going above and beyond Supply Chain checks, supported by the internal Audit, Risk and Compliance team.**
- **Working approaches to agency worker providers reviewed and refreshed.**

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.