

Modern Slavery Act 2015

ALD Automotive Limited Slavery and Human Trafficking Statement for the financial year ended 2024

MESSAGE FROM TIM LAVER, MANAGING DIRECTOR

INTRODUCTION

This statement is issued in response to the UK's Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (the "Acts"). These Acts require the disclosure by large organisations carrying on business in the UK and in Australia respectively, in an annual statement, of the steps taken to prevent modern slavery from occurring in their own operations and in their supply chains. This statement is made on behalf of ALD Automotive Limited ("ALD") in respect of the financial year ended 31st December 2024. ALD is part of the Société Générale Group and has decided to report as against the Australian Modern Slavery Act 2018 in line with the same decision taken by its ultimate parent company, Société Générale. In its own modern slavery statement Société Générale confirmed that each of its subsidiaries that are directly subject to one of these Acts, may rely on the Société Générale statement for its own declaration. In this statement, we have highlighted where ALD relies on the Société Générale statement. In line with the Société Générale statement, the actions taken by ALD as a subsidiary to assess and address the risks of modern slavery and human trafficking are detailed in this individual statement.

This statement was produced by ALD's legal department with input from across the company including colleagues from Operational Risk, Commercial Operations, the Procurement department and other relevant stakeholders. The preparation of this statement follows consultation with the relevant departments within ALD and with Société Générale over the past year.

Both Société Générale and ALD strive to act with integrity and in compliance with the laws and regulations applicable to their activities. Société Générale is subject to certain obligations relating to the management of both environmental and social risks and human rights risks (which include modern slavery). In addition, Société Générale is a member of Entreprises pour les Droits de l'Homme (Enterprises for Human rights), an association promoting discussions, working groups, consultations and best practice sharing in favour of an enhanced integration of human rights, including forced labour, into company policies and practices. As outlined below, ALD adheres to certain Société Générale policies and practices.

For ALD, being a responsible company lies at the heart of our business. Being responsible must be tangible in each of our decisions, positions and actions. Our mission is to offer the best vehicle leasing solutions to both corporate and consumer markets. Our success as one of the industry's leading service providers, relies on people, so respecting human rights and dignity is at the very core of our mission.

OUR GROUP

ALD, now a part of newly formed Ayvens, sits within the financial services arm of Société Générale and is the mobility, operational leasing and fleet management business line of Société Générale Group. Société Générale has a universal banking model based on complementary businesses around the

world, (including retail banking, corporate and investment banking, financial services, insurance, private banking and asset management).

SOCIÉTÉ GÉNÉRALE GROUP POLICIES AND PROCESSES

As part of the Société Générale Group, ALD follows Société Générale's relevant Group-wide policies including:

- Société Générale's Commitment Towards Human Rights¹;
- The Société Générale Code of Conduct² in which Société Générale commits to respect human rights (including those relating to the fight against slavery and human trafficking) and to comply with the rules established by the International Labour Organisation. This Code applies to all Société Générale's employees. In addition, the Société Générale Group expects its suppliers and those with whom it conducts business relationships to implement practices that are, or aim to be, consistent with this Code;
- The Worldwide Agreement on fundamental human rights and trade union rights signed between Société Générale and UNI Global Union, which was reconducted in 2019 and 2023 with a new global agreement. Under this, we are committed to ensure fair working conditions, to prevent employment related discrimination, to respect all health and safety regulations and freedom of association;
- The Policy on Responsible Sourcing & Compliance Rules Applicable to Sourcing (which is mentioned in the UNI agreement referred to above);
- The Société Générale Group's Policy on the Fight Against Money Laundering and Terrorist Financing within the Société Générale Group (internal document);
- The Société Générale Group's Anti-Bribery and Corruption Policy (internal document) and a dedicated Code Governing the Fight against Corruption and Influence Peddling; and
- The Group's Environmental and Social General Principles³.

OUR SUPPLY CHAIN

Our supply chain includes vehicle manufacturers, importers, dealers, traders and distributors, fuel management companies, service maintenance and repair suppliers, tyre suppliers, accident and rental management companies and suppliers in other supporting areas such as IT, professional services, catering, recruitment and marketing.

ALD recognises the reliance we place upon our supply chain. We are mindful of the need to choose our business partners well, carry out appropriate due diligence before commencing a relationship, and remain alert to the indicators of modern slavery throughout our dealings.

ALD recognises that human rights are fundamental and universal. We respect human rights, in the workplace and in our supply chain, as described in the United Nations' Universal Declaration of Human Rights and the principles of the International Labour Organization. We avoid being complicit in human rights abuses of any kind, and condemn the use of forced labour, compulsory labour and child labour.

¹<https://www.societegenerale.com/sites/default/files/documents/CSR/environmental-social-general-principles.pdf#page=11>

² <https://www.societegenerale.com/sites/default/files/documents/Code-conduct/code-of-conduct-en.pdf>

³ <https://www.societegenerale.com/sites/default/files/documents/CSR/environmental-social-general-principles.pdf>

Respect for human rights is also a key feature in our Sustainable Procurement Charter⁴ (previously known as our Supplier Code of Conduct).

ALD POLICIES AND PROCESSES

We published our Sustainable Procurement Charter to outline our value system and our principles-based approach to doing business. By incorporating the Ten Principles of the UN Global Compact into our Sustainable Procurement Charter we are not only upholding our basic responsibilities to people and planet, but also setting the stage for our common long-term success.

Our Sustainable Procurement Charter and procurement policies govern the approach we take with selecting and managing our supply chain.

Our approach to and expectations of our staff are governed by our policies on Equal Opportunities, Recruitment, Whistleblowing and in our Employee Code of Conduct. All of these policies are underpinned with the UK Anti-slavery Policy and reflect our commitment to acting ethically and with integrity and to operating effective systems and controls to remove the risk of slavery and human trafficking taking place within our supply chain.

These documents provide a framework for responsible business decisions in many everyday situations faced by our employees and Suppliers. Together these documents put our company values – commitment, expertise, passion and respect – into action.

The trust and confidence placed in us by our stakeholders – our clients, shareholders, suppliers, society and our employees – is crucial to the success of ALD.

Only by conducting our business according to our ethical standards can we win – and retain – that trust and can we succeed in our mission of being recognised as the global leader in fleet management and driver mobility.

We have identified two main areas of risk within our supply chain where there was a remote possibility of slavery and human trafficking; outsourced services and recruitment. The ALD policies in place and relevant to the prevention of slavery and human trafficking in these areas are:

➤ Outsourced Services

Our Procurement Policy allows for the analysis of prospective outsourced suppliers' ethics policies in the procurement process, with specific reference to slavery and human trafficking. Our Supplier Due Diligence Policy also allows for the analysis of the corporate structure and any related or associated risk factors of our suppliers with specific reference to financial crime and corruption.

➤ Recruitment

Our Recruitment Policy provides for appropriate checks (including National Insurance checks, passport and bank account checks) to be conducted on all new staff members to ensure their legal right to work in the UK.

⁴ <https://www.ayvens.com/en-cp/sustainability/>

All employees are engaged on written terms which are UK law compliant, have a right to terminate their employment contract and are paid at least the National Living wage.

Our Whistle Blowing Policy provides a framework for employees to report any concerns related to slavery and human trafficking in ALD's activities.

SELF-ASSESSMENT OF THE SUPPLY CHAIN

The Société Générale Group is subject to certain obligations relating to the management of both environmental and social risks which include human rights risks. The Société Générale Group's normative documentation governs environmental and social risk management in terms of sourcing and supplier relationship management throughout the Société Générale Group. The Sourcing Division uses tools to identify, assess and manage environmental and social risks at a granular level: product or service and supplier or service provider. These tools are used for purchases made by the Paris-based Société Générale Group Sourcing Division and at least for high-risk categories in the Sourcing function in other countries.

Some of these tools include:

- identifying the level of environmental and social risks for purchasing categories using the dedicated environmental and social risk mapping tool;
- including environmental and social criteria in calls for tender involving purchasing categories ranked as medium-high or high environmental and social risk;
- including environmental and social criteria in the KYS (*Know Your Supplier*) assessment for shortlisted suppliers, including verifying compliance with the environmental and social exclusion list;
- identifying whether a supplier represents a potential source of environmental and social controversy. This was reinforced in 2022, thanks to the monitoring, in a dedicated tool, and the identification and analysis of ESG controversies for suppliers assessed as posing a high environmental and social risk for procurement.

ALD benefits from the tools used by the Société Générale Group and we also run an annual modern slavery and human trafficking risk assessment of our own supply chain.

DUE DILIGENCE AND RISK MANAGEMENT

To demonstrate our commitment to combatting slavery and human trafficking, ALD also undertakes the following activities, both directly within ALD itself and indirectly through our supply chain:

- ALD aims to mitigate the risk of doing business with suppliers who are (controlled by) Sanctioned natural persons or legal person(s) entities. Therefore, core suppliers are subjected to a specific Sanction Only regime as per ALD's AML CTF and Sanctions Policy and Standards. In ALD, all suppliers are subject to additional screening which includes screening for adverse media and enforcement notifications.
- All new supplier contracts have Modern Slavery provisions incorporated through the Sustainable Procurement Charter and/or through specific contractual clauses. All suppliers are required to comply with the Sustainable Procurement Charter or demonstrate that they have

equivalent provisions in their own codes of conduct. These provisions usually give ALD the right to terminate the agreement if a supplier is found to be in breach.

- Any ALD tender for the provision of new services continue to require potential Suppliers to provide details of their Modern Slavery Policies, Statements and assurance regarding compliance.
- ALD have modern slavery / supply chain management as part of our supplier risk assessment which is assessed prior to the supplier onboarding with ALD.
- A standard practice within ALD is for all potential new suppliers to be cross-checked against multiple exclusion and embargo lists maintained by Société Générale and an external provider as part of our underwriting checks. These measures, along with the tools available as part of the Société Générale Group, help limit any potential risks to our supply chain prior to the onboarding of new suppliers.

In 2024, ALD again conducted enhanced due diligence on suppliers within certain risk categories.

- As part of the first step in this process, we identified industries where wages are typically lower (for example, office cleaning, car-vaiting and security services), where dangerous activities are performed or where hazardous materials are in use. We also identified multi-national suppliers that are based in third world countries. Our full directory of suppliers was reviewed and shortlisted to those that posed a higher risk of modern slavery or human trafficking. The suppliers' responses to the previous year's modern slavery and human trafficking questionnaire were reviewed and the responses that were anything less than satisfactory have been included in the 2024 assessment. The suppliers with a satisfactory response were excluded from this year's assessment as part of a risk-based approach and will be included again in the future if any risks are posed from that supplier or the industry that they are part of.
- The next step was for the procurement team to contact suppliers identified in the first step to circulate an online modern slavery and human trafficking questionnaire on key points such as whether the supplier had their own modern slavery statement and policy and training for its own staff to recognise modern slavery and trafficking; whether it conducted checks and audits for modern slavery and trafficking in its own supplier chain and also examining working conditions and terms for its own workers and contractors.
- Our Operational Risk department and Procurement team conducted due diligence on the supplier's responses to determine if the answers received were acceptable and if any additional risks were identified/remained. When considering the acceptability of the supplier's responses, factors such as the supplier's size and whether the Acts applied to them were taken into account. If any new risks were identified, the team contacted the supplier to discover what actions they are taking to combat the issues raised.
- Based on the results received to date for the modern slavery and human trafficking questionnaire and our risk assessment, it was deduced that all supplier entities are either acting appropriately in relation to the Modern Slavery Act, or are not required/do not have the need for a statement or the controls to mitigate against such risks. We do not believe that

we have any suppliers that present a greater risk than “minimal risk” of slavery and human trafficking.

PRODUCTS AND SERVICES AND ASSOCIATED PROCESSES

All customers, partners and suppliers (including directors, corporate structure and UBOs) are screened against World-Check as part of our customer and supplier due diligence policy and Know Your Customer checks. These checks provide a more granular classification of information obtained from media sources, sanctions or law and regulatory enforcement sources to indicate the nature of alleged or actual offences and/or information relating to the status of explicit and implicit sanctions that may pertain to data subjects in World-Check records. World-Check released six new special interest categories at the end of March 2021, including "Exploitation of Children", "Human Trafficking" and "Forced and Slave Labour" against which new customers and new and existing suppliers and partners are screened and checked.

TRAINING AND AWARENESS

We recognise that our employees have an important role in mitigating modern slavery risks within our business and our supply chain.

- All new ALD employees have signed up to the Société Générale Code of Conduct. Non-compliance with the Société Générale Code of Conduct is taken seriously and any failure to comply with the Code of Conduct may lead to disciplinary action and could include termination of employment.
- The ALD Anti-Slavery Policy is reviewed annually to ensure ongoing compliance with all relevant legislation and non-compliance with this policy is a disciplinary offence.
- ALD has documented policies for reporting of Incidents and Whistleblowing to facilitate the reporting of incidents with regard to modern slavery and human trafficking. ALD has made access to its Whistleblowing facility through internal channels enabling suppliers and other external parties to report incidents.

FURTHER ACTION TAKEN TO ADDRESS MODERN SLAVERY

We will know the effectiveness of the steps that we are taking to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices related to ALD or our supply chain have been identified;
- All employees go through a strict recruitment and selection process whereby we ensure they have the right to work in the UK and have gone through the required due diligence screening. All employees are paid at least the Real Living Wage, as defined by the Living Wage Foundation (note that this is higher than the National Minimum Wage and National Living Wage as defined by the UK Government). In addition, we monitor and publish our performance on gender pay gaps.

- Any adverse media reports for suppliers in high-risk areas identified as part of the supplier due diligence process are fully investigated to ensure that there is no modern slavery or human trafficking taking place or an alternative supplier has been used.
- All ALD UK employees have carried out e-learning training focusing on the risk areas for our supply chain, provided them with an understanding of the signs of modern slavery and highlighting what they can do if they suspect this is taking place. All new employees now receive the e-learning training within the first 3 months of their employment.

FUTURE STEPS

In its Modern Slavery statement for 2025, Société Générale identified the following main actions planned as regards its supplier processes:

- the continuous improvement of the tools to help identify, assess and manage inherent environmental and social risks to ensure that emerging issues related to new technologies such as Artificial Intelligence are taken into account;
- gradually imposing stricter environmental and social risk management for purchasing within the Sourcing Function for the international market, introducing a minimum 15% weighting for environmental and social criteria in calls for tenders for purchasing categories representing a high environmental and social risk by 2025;
- the extension of the management of the inherent environmental and social risks in the sourcing acts of the new entities integrated into the Sourcing Division and the Sourcing Function for the international market;
- continuing to provide training on Responsible Sourcing and environmental and social risk management tools to buyers in the Sourcing Division and the Sourcing Function for the international market, as well as to entities that regularly manage their own sourcing, if they should request it;
- conducting CSR audits, jointly with other banks where possible, on suppliers presenting environmental and social risk factors, and following them up with action plans when necessary;
- continuing to improve the process of identifying and managing environmental and social controversies for Société Générale Group suppliers, and pursuing targeted dialogue with and, where appropriate, challenging those suppliers identified as being involved in significant controversies;
- the industrialisation of the management and materiality analysis of environmental and social controversies identified in the context of the KYS process at the beginning of the relationship as well as during periodic reviews;
- the optimisation, in conjunction with three of Société Générale's peers, of the extra-financial evaluation suppliers.

And the following main actions planned as regards its products and services and associated processes:

- updating the procedures for operationalising sectoral policies and training actions on the environmental and social risk management system, in order to support the business lines in complying with the application criteria of sectoral policies;

- the continuation of the enrichment of the training offer in 2025, in order to continue to develop a transversal CSR culture and support the Business Units and Service Units in their expertise needs;

The Société Générale Group is also striving to identify emerging risks related to changes in technologies and their uses and in particular risks related to the development of Artificial Intelligence. This exploratory approach has already been initiated in recent months and may also be extended to other emerging technologies depending on the Société Générale Group's development and ambitions on these new technologies.

ALD shall, where appropriate, seek to implement relevant action plans arising from Société Générale's work on these issues and will continue to improve the process of identifying and managing modern slavery risks from our suppliers.

We continue to achieve a gold Ecovadis rating which is an indicator of our strong CSR and environmental and social policies. We will continue to monitor the effectiveness of these measures to optimise our controls around detecting and preventing modern slavery.

CONCLUSION

In view of the policies and processes outlined above, we have a framework that adequately safeguards ALD against slavery and human trafficking within our own business and that of our suppliers. We believe that there is a very low risk of slavery and human trafficking taking place within ALD or our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and to Part 2 (Section 16) of the Australian Modern Slavery Act and constitutes ALD's Slavery and Human Trafficking Statement for the financial year ending 2024.

This statement was approved by the Board of ALD Automotive Limited on 27th June 2025.



Tim Laver

Managing Director

ALD Automotive Limited