

Modern Slavery Statement for 2025

ALD Automotive Group Limited part of the Ayvens Group

Modern Slavery Statement for 2025

This statement is issued in response to the UK's Modern Slavery Act 2015 (the "Act"). The Act requires the disclosure by large organisations carrying on business in the UK, 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 Group Limited part of the Ayvens Group ("ALD") in respect of the financial year ended 31st December 2025. ALD is part of the Société Générale Group. In its own modern slavery statement Société Générale confirmed that each of its subsidiaries that are directly subject to the Act, 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 Sustainability team with input from across the company including colleagues from Legal, Compliance, Procurement and other relevant stakeholders. The preparation of this statement follows consultation with the relevant departments within ALD and with Société Générale.

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.

ABOUT ALD PART OF THE AYVENS GROUP

ALD, now a part of newly formed Ayvens, sits within the financial services arm of Société Générale and is part of 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).

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.

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 Statement on Human Rights.
- Société Générale's Code of Conduct in which the Société Générale Group undertakes to respect human rights (including those relating to modern slavery and human trafficking) and to comply with the rules established by the International Labour Organisation fundamental conventions. This Code applies to all Société Générale Group 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 in 2015, and which has been renewed in 2019 and in 2023 with a new global agreement.
- Internal policies, formal processes and agreements relating to human resources – in certain cases being submitted to trade union agreement. The Société Générale Group provides its entities with normative documentation specific to the types of risks, including human rights risks. This documentation is updated, internally disseminated and accessible.
- The Société Générale Group’s Policy on Responsible Sourcing & Compliance Rules Applicable to Sourcing – which is mentioned in the UNI Global agreement.
- 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.

In addition to these policies, the Société Générale Group is sharing best practice with peers on such issues. For example, Société Générale is a member of “Entreprises pour les Droits de l’Homme” (Enterprises for Human Rights), a French 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.

Moreover, Société Générale is a partner of the French Global Deal platform, a multi-stakeholder initiative which promotes social dialogue, consultation and negotiation between or among representatives of governments, employers and workers on economic and social policy issues), as a means to achieving decent work, quality jobs and increased productivity and, by extension, greater equality and inclusive growth.

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. Respect for human rights is also a key feature in our Sustainable Procurement Charter (previously known as our Supplier Code of Conduct) as seen at <https://www.ayvens.com/en-cp/sustainability/>

Electric vehicle batteries require certain materials, especially cobalt and lithium, that have been associated with poor mining practices and human rights abuses. A failure to ensure satisfactory labour conditions and protect human rights in this supply chain could materially affect our own demand and our customers’ demand for electric vehicles and therefore inhibit our ability to offer sustainable electric solutions.

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 these policies are underpinned with the UK Anti-slavery Policy and have each been approved by the Senior Management of ALD to 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. 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.

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 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).

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

RISK MAPPING AND ASSESSMENT RESULTS

Human Resources and safety risk monitoring and assessment regarding human rights are based on an inherent risk mapping. In order to identify and better understand local issues, the Société Générale Group assesses the level of exposure to risks of serious violations of human rights, in all its countries of operation. Mapping of inherent risks was updated in 2025 using an external database of indicators detailing the risk levels specific to the country in which the Société Générale Group operates (financial sector and leasing). The Human Resources Division considers that the local context is a crucial factor in the analysis of inherent risks and the policies and measures implemented to prevent them.

In 2023, Société Générale renewed its commitment to the international union federation, UNI Global Union, for four years, by signing a new worldwide agreement on Société Générale Group employee rights, based on the previous agreements signed in 2015 and 2019. This agreement confirms the Société Générale Group's commitment to topics such as: trade union rights, the digital environment, health, safety and quality of life at work including the prevention of inappropriate behaviour, of which the fight against discrimination and harassment, the development of diversity and respect for gender equality as well as universal commitments to social protection, etc. Through this agreement, UNI Global Union is recognized as a “stakeholder” in the Duty of Care Plan for the Société Générale Group employees sub-scope.

Results

Focusing on human rights (covering forced labour, trafficking in persons which includes modern slavery, child labour and involvement of public and private security forces in human rights violations), no Société Générale Group employee is located in a country considered to be very high or high risk according to the external database consulted.

Detailed results are as follows:

70,11% of the workforce are located in countries with a low risk; 29,89% of the workforce are located in countries with a medium risk: China, Cameroon, India, Brazil, Ukraine, Turkey, Ghana, Mexico, Benin, Côte d'Ivoire, Togo, Malaysia, Peru, Senegal, Colombia, Morocco, United Arab Emirates, Algeria, United States of America, Romania, Hong Kong, Tunisia, Bulgaria, Serbia, Singapore, Hungary.

RISK MITIGATION MEASURES

To prevent and mitigate inherent E&S risks in the Société Générale Group's relationships with employees, the Société Générale Group defines specific guidelines that cover issues related to human rights in addition to policies that apply Société Générale Group-wide, which are then implemented by the Business Units and Service Units:

- Internal normative documentation for the Société Générale Group that sets out all the operating and organisational rules (the Société Générale Code). This documentation is adapted to the nature of the Société Générale Group's activities and takes into account all types of risks, including those related to human rights and fundamental freedoms and the health and safety of the Société Générale Group's employees. This document is updated, disseminated and accessible to all. Each entity approves the application of these rules locally;
- policies and procedures which prohibit all forms of forced labour. Moreover, the Société Générale Group has set the minimum age for employment at 16 years and Société Générale Group entities are required to check the age of all new employees at the hiring stage; and
- risk mitigation is based on the implementation of regular controls (using existing HR systems in particular) and ongoing monitoring, with a view to taking corrective action.

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; and
- 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 on-boarding 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 valeting 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. This Code of Conduct covers the Ayvens principles of business that all employees are expected to follow: Honesty and Trust, Respect for Law, Human Rights, and Sustainability. 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.
- All ALD employees have carried out eLearning 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.

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 2026, Société Générale identified the following main actions planned as regards its supplier processes:

Regarding Our Employees

At Société Générale Group level, the main actions planned are as follows:

- Make sure that the Global Agreement on the rights of Société Générale Group employees, signed with UNI Global Union and renewed in 2023 is well known by all our entities;
- Pursue constructive discussions with our internal stakeholders (staff representatives, employees, managers, etc.) through the various internal listening systems (culture of dialogue, Employee Barometer, Whistleblowing, etc.); and
- Continue social dialogue with the various employee representation bodies on topics covered by the Duty of Care Plan.

Regarding Our Suppliers

The Group is planning to implement the following main actions:

- review and updating of inherent E&S risk mapping, including human rights, employment conditions risks and decent living wage review in particular for AI-related issues.
- the continuous updating of our tools to help identify, assess and manage inherent E&S risks to ensure that emerging issues related to new technologies such as AI are taken into account;
- the extension of the management of the inherent E&S risks in the sourcing acts of the new entities integrated into the Sourcing Division and the International Procurement Function if applicable;
- continuing to provide training on Responsible Sourcing and E&S risk management tools to buyers in the Sourcing Division and the International Procurement Function for the international market, as well as to entities that regularly manage their own purchasing, if they should request it;

- conducting CSR audits, jointly with other banks where possible, on suppliers presenting E&S risk factors, and following them up with action plans when necessary; and
- the optimisation, in conjunction with three of our peers, of the extra-financial evaluation of our suppliers.

Regarding Our Products and Services

The Société Générale Group is planning to implement the following main actions:

- Continue to improve procedures for operationalizing the E&S risk management system, in particular in order to support the business units in complying with the criteria for the application of sectoral policies; and
- Strengthening detailed E&S analysis on human rights for large companies. In addition to the inherent E&S risks captured by the mapping detailed above, 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 underway for several months and may also be extended to other emerging technologies depending on the Société Générale Group's developments and ambitions in relation to 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.

Within ALD operations 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.

In response to the "Transparency in Supply Chains" guidance issued by the UK Government on 27 March 2025, ALD intends to establish a Modern Slavery Working Group in 2026 with key stakeholder engagement tasked to support the business to undertake further prescriptive and meaningful action to tackle modern slavery.

We will carry out a comprehensive survey of our UK supply chain in 2026, including adherence to and progress in Modern Slavery Reporting. The results from this survey will inform future initiatives in our supply chain.

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 constitutes ALD's Slavery and Human Trafficking Statement for the financial year ending 2025.

This statement was approved by the Board of ALD Automotive Group Limited part of the Ayvens Group on 29 June 2026.

Tim Laver

Tim Laver
Managing Director
ALD Automotive Group Limited part of the Ayvens Group
Date: 29 June 2026