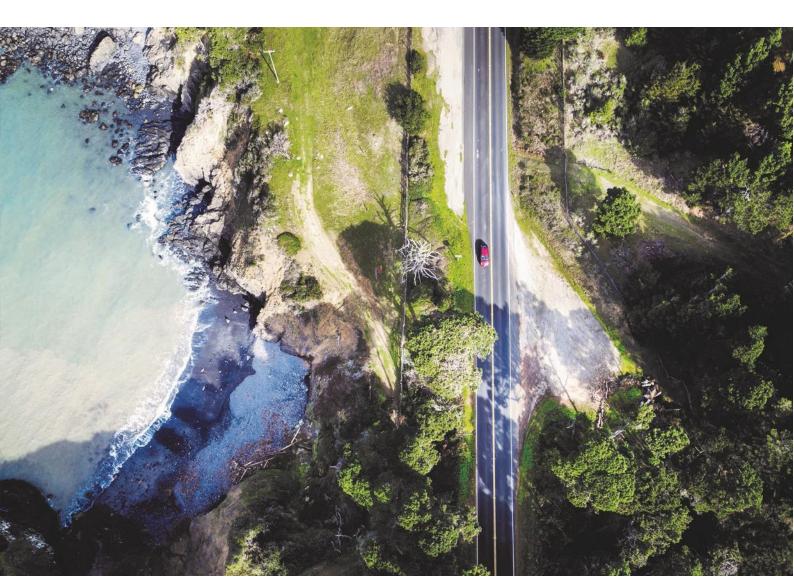
LeasePlan

# Modern Slavery Statement for 2022

LeasePlan UK Limited, LeasePlan Global B.V. & LeasePlan Corporation N.V.





# Modern Slavery Statement for 2022

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

# ABOUT LEASEPLAN

LeasePlan is a global leader in Car-as-a-Service, with approximately 1.6 million vehicles under management in over 28 countries. LeasePlan purchases, funds and manages new vehicles for its customers, providing a complete end-to-end service for a typical contract duration of three to four years. With a history of 60 years, LeasePlan's mission is to provide 'What's next' in sustainable mobility so our customers can focus on 'What's next' for them.

## 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, procurement, professional services and marketing.

LeasePlan 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.

LeasePlan 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 Supplier Code of Conduct) as seen at www.leaseplan.com/corporate.

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. Through our participation in the Global Battery Alliance, convened by the World Economic Forum (we are a founding member of its Battery Passport Initiative), and in cooperation with key supply chain participants, we are in discussion on how best to ensure human rights abuses do not occur going forward, and that sustainable mining practices and traceability are embedded in battery manufacture.

## OUR POLICIES AND CONTRACTUAL CONTROLS

This year 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 plant, 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 in our policies on Equal Opportunities, Recruitment and Selection, Voluntary Leaver, Whistleblowing and in our Employee Code of Conduct.



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

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.

#### LEASEPLAN'S APPROACH TO COMBATTING SLAVERY AND HUMAN TRAFFICKING

To demonstrate our commitment to combatting slavery and human trafficking, LeasePlan Corporation NV and LeasePlan UK undertake the following activities, both directly within LeasePlan itself and indirectly through our supplier chain:

#### Due Diligence & Risk Management

- LeasePlan 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 LeasePlan's AML CTF and Sanctions Policy and Standard. In LeasePlan UK, all suppliers are subject to additional screening which includes screening for adverse media and enforcement notifications.
- All supplier contracts have Modern Slavery provisions incorporated through the LeasePlan Sustainable Procurement Charter and/or through specific contractual clauses. All LeasePlan entities are required to ensure that their suppliers comply with the Sustainable Procurement Charter or demonstrate that they have equivalent provisions in their own codes of conduct. These provisions usually give LeasePlan the right to terminate the agreement if a supplier is found to be in breach.
- Any LeasePlan UK 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.
- LeasePlan UK have modern slavery / supply chain management as part of our supplier risk assessment which is assessed prior to the supplier onboarding with LeasePlan.

#### Action Taken to Address Modern Slavery

It should be noted that no negative indicators were reported in the previous 12 months.

LeasePlan UK will know the effectiveness of the steps that it is taking to ensure that 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 LeasePlan or its supply chain have been identified;
- All employees have signed the Annual Compliance Declaration for the LeasePlan Code of Conduct and undertake mandatory compliance training courses;



- 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 dilligence process are fully investigated to ensure that there is no modern slavery or human trafficking taking place or an alternative Supplier has been used.
- Responses from Suppliers to LeasePlan's modern slavery questionnaire came back without any adverse results

#### Training & Awareness

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

- All LeasePlan employees have signed up to the LeasePlan Code of Conduct, either upon joining LeasePlan or on the annual refresh that took place in Q1 2022. This covers the LeasePlan principles of business that all employees are expected to follow: Honesty and Trust, Respect for Law, Human Rights, and Sustainability. Noncompliance with the LeasePlan 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 LeasePlan UK Anti-Slavery Policy is reviewed annually to ensure ongoing compliance with all relevant legislation (last updated 03 October 2022) and non-compliance with this policy is a disciplinary offence.
- LeasePlan has documented policies for reporting of Incidents and Whistleblowing to facilitate the reporting of incidents with regard to modern slavery and human trafficking. LeasePlan has made access to its Whistleblowing facility through internal channels and also on the LeasePlan Corporation website, enabling suppliers and other external parties to report incidents.
- All LeasePlan UK employees have carried out eLearning training in January 2022 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. Since January 2022, all new employees receive the eLearning training within the first 3 months of their employment.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes LeasePlan UK Limited's, LeasePlan Global B.V.'s and LeasePlan Corporation N.V.'s slavery and human trafficking statement for the financial year ending 31 December 2022.

Jun 5, 2023

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