

LeasePlan

## Modern Slavery Statement for 2024

LeasePlan UK Limited



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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 LeasePlan UK Limited ("LeasePlan") in respect of the financial year ended 31st December 2024. LeasePlan 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 LeasePlan relies on the Société Générale statement. In line with the Société Générale statement, the actions taken by LeasePlan 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 LeasePlan's legal team with input from across the company including colleagues from Compliance, Procurement and other relevant stakeholders. The preparation of this statement follows consultation with the relevant teams within LeasePlan and with Société Générale.

Both Société Générale and LeasePlan strive to act with integrity and in compliance with the laws and regulations applicable to its 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, LeasePlan adheres to certain Société Générale policies and practices.

For LeasePlan, being a responsible company lies at the heart of our business. Being responsible must be tangible in each of our decisions, positions and actions. 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.

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.

LeasePlan sits within the financial services arm of Société Générale and is part of the 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, LeasePlan follows Société Générale's relevant Group-wide policies including:

- Société Générale's Code of Conduct<sup>1</sup> in which the Société Générale Group commits to respect human rights (including those relating to the fight against 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 Société Générale Group's Policy on the Fight Against Money Laundering and Terrorist Financing Within the Société Générale Group (internal document); and
- the Société Générale Group's Anti-Bribery and Corruption Policy (internal document) and a dedicated Code Governing the Fight Against Corruption and Influence Peddling.

## 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.

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 <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. 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.

## LEASEPLAN 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.

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<sup>1</sup> <https://www.societegenerale.com/sites/default/files/documents/Code-conduct/code-of-conduct-en.pdf>

Our approach to and expectations of our staff are governed by our policies on Equal Opportunities, Recruitment and Selection, Voluntary Leaver, Whistleblowing and in our Employee Code of Conduct. All of these policies are underpinned with the UK Anti-slavery Policy and have each been approved by the Senior Management of LeasePlan 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 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.

## SELF-ASSESSMENT OF THE SUPPLY CHAIN

The Société Générale Group is subject to certain obligations relating to the management of both environmental and social (“E&S”) risks, which include human rights risks. The Société Générale Group’s normative documentation governs E&S 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 E&S 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 E&S risks for purchasing categories using the dedicated E&S risk mapping tool;
- including E&S criteria in calls for tender involving purchasing categories ranked as medium-high or high E&S risk;
- including E&S criteria in the KYS (*Know Your Supplier*) assessment for shortlisted suppliers, including verifying compliance with the E&S exclusion list;
- identifying whether a supplier represents a potential source of E&S 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.

To demonstrate our commitment to combatting slavery and human trafficking, LeasePlan undertakes 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, 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 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 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 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. Based on the results received to date for the Modern Slavery and Human Trafficking questionnaire and our risk assessment, it was deduced that all entities are either acting appropriately in relation to the MSA or are not required/do not have the need for a statement and the controls to mitigate against such risks. LeasePlan does not believe that it has any suppliers that present a greater risk than “minimal risk” of slavery and human trafficking.

LeasePlan 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 new employees have signed the Annual Compliance Declaration for the 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 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;
- Responses from Suppliers to LeasePlan's modern slavery questionnaire came back without any adverse results.

In 2023, LeasePlan conducted enhanced due diligence on suppliers within certain risk categories.

- As part of the first step in this process, LeasePlan identified industries where wages are typically lower, where dangerous activities are performed or where hazardous materials are in use. LeasePlan's full directory of suppliers was reviewed and shortlisted to those that posed a higher risk of modern slavery or human trafficking.
- The next step was for LeasePlan's Procurement team to contact suppliers identified in the first step to circulate an online 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.
- LeasePlan's Compliance, Procurement and Legal teams conducted due diligence on the suppliers' responses to determine if the answers received were acceptable and if any additional risks were identified/remained. When considering the acceptability of the suppliers' responses, factors such as the supplier's size and whether the Acts applied to them were taken into account.

- The Procurement team actively monitored the suppliers' responses and if any new risks were identified, the team contacted the supplier to discover what actions they are taking to combat the issues raised.

### Training & Awareness

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

- All new LeasePlan employees have signed up to the LeasePlan Code of Conduct. Due to the acquisition of LeasePlan by Société Générale this code of conduct was replaced by the Société Générale Code of Conduct in October 2023. This Code of Conduct covers the LeasePlan principles of business that all employees are expected to follow: Honesty and Trust, Respect for Law, Human Rights, and Sustainability. Non-compliance with the 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 Anti-Slavery Policy is reviewed annually to ensure ongoing compliance with all relevant legislation (last updated 28 October 2024) 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 external website, enabling suppliers and other external parties to report incidents.
- All LeasePlan 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.

### FUTURE STEPS

As part of the acquisition of LeasePlan by Société Générale Group, LeasePlan may also implement Société Générale's relevant Société Générale Group-wide policies as part of its integration plan in future, including:

- Societe Generale's Commitment Towards Human Rights<sup>2</sup>
- 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 reconducted 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 – appended to the UNI Global agreement;
- the Société Générale Group's Environmental and Social General Principles<sup>3</sup>;

<sup>2</sup> <https://www.societegenerale.com/sites/default/files/documents/CSR/environmental-social-general-principles.pdf#page=11>

<sup>3</sup> <https://www.societegenerale.com/sites/default/files/documents/2021-03/Environmental-and-Social-General-Principles.pdf>

In its Modern Slavery statement, 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 E&S risk management for purchasing within the Sourcing Function for the international market, introducing a minimum 15% weighting for E&S criteria in calls for tenders for purchasing categories representing a high E&S 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 E&S 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 E&S risk factors, and following them up with action plans when necessary;
- continuing to improve the process of identifying and managing E&S 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 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.

LeasePlan 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 its suppliers.

## CONCLUSION

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

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes LeasePlan UK Limited's slavery and human trafficking statement for the financial year ending 31 December 2024.

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