

Motability Operations Group plc and its subsidiaries Modern Slavery Statement 2021/2022

This statement is made by Motability Operations Group plc and its subsidiaries (“Motability Operations”) pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) for the financial year ending 30 September 2021.

Our Business

Motability Operations is a vehicle leasing company which operates in the United Kingdom as the principal service provider to the Motability Scheme (“the Scheme”).

Customers in receipt of a qualifying mobility allowance from the government are able to join the Scheme and use their mobility allowance to lease a vehicle, wheelchair accessible vehicle, scooter or powered wheelchair from Motability Operations for either a three or five-year lease. Motability Operations purchases each lease product through its arrangements with vehicle manufacturers and dealerships and then leases the product directly to the customer.

Supply Chain

We recognise that the supply chains of companies in the vehicle leasing industry can be complex. As a result, there are several levels of suppliers between the source of the raw materials used in the manufacturing process, the vehicle manufacturers and Motability Operations as the end supplier of each product.

Motability Operations considers its tier 1 suppliers to be those with whom it has a direct contractual relationship. This will therefore include, but not be limited to, vehicle dealerships, cleaning contractors, IT suppliers and Scheme Partners. As a result of the potential number and variety of non-tier 1 suppliers in Motability Operations’ supply chain, it is difficult for us to effectively monitor and manage the modern slavery activities of those suppliers.

Motability Operations is, however, committed to ensuring that its tier 1 suppliers are aware of and comply with the Act. Throughout the last 12 months, therefore, Motability Operations has been actively encouraging its tier 1 suppliers to monitor compliance with the Act within their own supply chains.

Relevant Policies and Processes

There are a number of internal policies which support and foster continuing compliance with the Act including:

Whistleblowing Policy: This policy seeks to support and encourage all Motability Operations’ personnel to report any concerns relating to misconduct, malpractice or illegal activities without being subjected to any detriment. This would therefore include any concerns regarding slavery and human trafficking and all such concerns are investigated thoroughly and confidentially.

Disability Confidence Policy: Disability confidence is a fundamental operating practice for Motability Operations. This policy aims to ensure that personnel with disabilities are not disadvantaged in any way, assisting Motability Operations in ensuring that there is no modern slavery within its organisation.

Diversity Policy: Motability Operations believes it has much to learn and gain from diverse cultures and perspectives and that diversity is an enabler to providing exceptional service to our customers. The aim of the policy is to ensure that diversity values are evident in recruitment and selection, training and development and addressing potential discrimination during employment.

All internal policies are reviewed on an annual basis and are available to all personnel on an internal intranet system.

In addition to this, Motability Operations has robust recruitment processes in place.

Direct Recruitment: Motability Operations' Human Resources Department has appropriate procedures in place to ensure that all relevant and necessary checks are completed to confirm a prospective employee has the right to work in the UK before the individual commences work.

Third Party Outsource Provider: Motability Operations uses a single reputable third party outsource provider to facilitate the provision of flexible/agile workforce resources to support specialist business requirements and requires the third party outsource provider to ensure that any flexible resource has the right to work in the UK prior to the commencement of the engagement.

Due Diligence Processes for Slavery and Human Trafficking

In order to support and foster Motability Operations' continued compliance with the Act and to identify and mitigate risks, Motability Operations will, over the course of the next year, conduct a review of its key tier 1 suppliers to identify, assess and mitigate potential risk areas within those supply chains.

Further Steps

Following a review of the effectiveness of the steps it has taken this year to ensure there is no slavery or human trafficking in its supply chains, Motability Operations intends to take the following further steps throughout the next year to combat slavery and human trafficking:

- Motability Operations will, as appropriate, insert a suitable Modern Slavery clause into key tier 1 supplier contracts where slavery and human trafficking has the potential to be more prevalent and/or where the supplier is based in a location where slavery and human trafficking is more common; and
- Motability Operations will insert suitable references into its Request for Proposal and Request for Information documentation to ensure it is provided with adequate information about a supplier's compliance with the Act at the earliest opportunity and prior to a supplier's engagement.

Continuing Commitment

Motability Operations is committed to not knowingly supporting or doing business with any supplier involved in slavery or human trafficking and expects all of its tier 1 suppliers to impose obligations on their own suppliers, in order to ensure compliance with the Act. With this in mind, we will continue to work closely with tier 1 suppliers to reduce and/or eliminate the risk of modern slavery.

This statement has been approved by Motability Operations' board of directors and will be reviewed and updated annually.

Signed:

A handwritten signature in black ink that reads "Andrew Miller". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Andrew Miller
Chief Executive Officer
Motability Operations Group plc

Date: ...30 November 2021.....