



MODERN SLAVERY ACT STATEMENT

This statement is made on behalf of Carwow Limited and the active subsidiaries in its group: Carwow Studio Limited, Carwow Leasey Limited, AutoD2 Limited, Carwow GmbH, Carwow Spanish S.L. and Carwow Portugal LDA (“**Carwow**”, “**we**”, “**us**”, “**our**”).

Carwow is committed to improving our practices to combat slavery and human trafficking in our business and supply chains. This statement describes the steps we have taken to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business. We have published this statement in accordance with section 54 of the Modern Slavery Act 2015 (the “**Act**”) in relation to the financial year ended 31 December 2025.

Organisation's structure, business and supply chain

Our mission is to create the ultimate online car buying and selling experience. We own and operate a digital platform in the automotive sector, helping customers compare offers and discover the best car for them, or sell their current car to trusted dealers. We also engage and educate our customer base via our popular automotive channel on YouTube and through our media, editorial and magazine publishing business. Finally, we offer a suite of data-driven tools and services, including lead generation, stock sourcing, brand building, e-commerce training, marketing and advertising.

Our supply chains include:

- Facilities: maintenance and cleaning services
- People: recruitment and training services; customer services
- Professional services: finance, legal and other professional services
- Publishing: printing, publishing and distribution of print products
- Events: awards and outdoor events
- Products: sales and use of branded products
- Advertising and marketing: online marketing and advertising services
- Technology: external data centres, data providers, IT infrastructure, hardware providers, cyber security services and software suppliers

Our policies on slavery and human trafficking

We have zero tolerance to slavery and human trafficking. We comply with all relevant laws in the way we run our businesses. This anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

To ensure all those in our supply chain and contractors comply with our values and that our employees have a safe way of reporting any suspected misconduct, we have in place a confidential, independent whistleblowing procedure to enable staff to report suspected malpractice.

We are of the belief that we operate in a low risk industry sector. We are confident that most of our supply chain is very low risk and that there is no modern slavery or human trafficking taking place within our organisation.

Where we believe that some parts of our supply chain may be of higher risk (medium), for example, in areas such as our branded products or our events business, where we routinely hire hotels, function rooms and outdoor spaces, we ensure that we deal with this potential risk through close monitoring of these suppliers.

In any instances where we felt there was such a risk, we would contact our existing suppliers in writing, reminding them of the expectations we have when working with them.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk in our supply chains, we carry out proportionate checks on our new suppliers, including (where appropriate and proportionate) requesting new suppliers to complete a due diligence questionnaire.

In addition, we may seek contractual assurances from key suppliers in relation to modern slavery and human trafficking compliance where those suppliers operate in, or make us part of, supply chains which present higher risks of modern slavery or human trafficking.

Training

All employees receive annual training to ensure compliance with our various policies and responsibilities. These policies are hosted on our website and/or intranet sites.

Effectiveness

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Reviewing any investigations undertaken into reports of modern slavery (if any); and
- Reviewing staff training levels.

Progress

In our 2024 statement, we committed to two specific initiatives to strengthen our approach to combatting modern slavery and promoting ethical conduct throughout our business and supply

chains. We are pleased to confirm that both have been delivered during the financial year ended 31 December 2025:

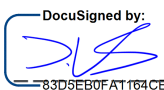
- We have updated our standard contract templates to include specific modern slavery and human trafficking compliance clauses, thereby reinforcing our expectations with suppliers and partners.
- We have developed and launched our [Code of Car Changing](#), a code of conduct that seeks to set a standard of behaviour for users of our platform including requiring them to act legally and ethically. While our 2024 commitment had been to develop a dealer-facing Code of Conduct, we extended the scope so that the Code applies more broadly across the parties involved in the car changing journey, providing clear guidelines and ensuring that those we work with operate in a manner consistent with our values.

In 2025 we also deployed an AI-powered contract review across new and renewing supplier contracts. Beyond standardising our contractual position, the initiative established something we previously lacked: an auditable, ongoing measure of modern slavery compliance across our supplier base. The first year's data showed that 89% of contracts arrived without a modern slavery clause, and that we successfully negotiated one in on 92% of those contracts.

Looking ahead

We will continue to embed the Code of Car Changing and our updated contractual protections across our supplier and partner base, and to monitor compliance with both. We remain committed to strengthening our approach to combatting modern slavery and promoting ethical conduct throughout our business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2025. It was approved by the Board on 7 May 2026.

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John Veichmanis
CEO, Carwow Ltd