

This statement is made on behalf of carwow Ltd and the following companies in its group: carwow GmbH and carwow Spanish SL ("carwow", "we", "us", "our").

carwow is committed to improving our practices to combat slavery and human trafficking in our business and supply chain. 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**").

### 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. 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
- Professional services: finance, legal and other professional services
- 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. Our 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 we have in place a confidential, independent whistleblowing helpline to enable staff to report suspected malpractice.



# Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk 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 where appropriate 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 (KPIs) 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.

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 ending 31 December 2021. It was approved by the board on 9 February 2023.



**JAMES HIND** 

CEO, carwow Ltd

