

MODERN SLAVERY STATEMENT

For the year ended 31 March 2023

Introduction

The principal activity of Kinto UK Limited (“KINTO UK”) is the provision of contract hire and contract purchase arrangements for motor vehicles and fleet management services in the United Kingdom, and the disposal of contract hire vehicles on termination of contract.

KINTO UK continue to implement procedures to effectively monitor and identify modern slavery and human trafficking within our business practices. It is our aim to ensure compliance with all applicable law and regulation, and to maintain the integrity of the KINTO brand and those of our parent and affiliate companies. This is our annual statement under s54 of the Modern Slavery Act 2015 (the “Act”) and it sets out the actions we have taken to prevent modern slavery and human trafficking within our business and supply chain during the past year.

Defining Modern Slavery

Modern slavery refers to the deprivation of fundamental human rights, including freedom from forced labour and the right to liberty, for the purpose of personal or commercial gain. This covers a wide range of exploitative practices such as slavery, servitude and forced or compulsory behaviour; and human trafficking.

KINTO UK continue to be fully committed to acting responsibly and ethically within our commercial dealings and are always actively seeking to improve and implement preventative mechanisms to minimise the risk of modern slavery within our businesses and supply chains.

Our Policy on Anti-Slavery and Human Trafficking

To affirm our position, KINTO UK maintains an anti-slavery and human trafficking policy which is reviewed updated and approved by the Management Board at least annually.

Our anti-slavery and human trafficking policy provides a clear, robust and accessible framework for all staff to observe and adhere to. As well as reflecting legislative requirements, the policy acknowledges our corporate approach to being a good corporate citizen and to acting ethically, and with integrity. Setting a high standard for our key stakeholders to maintain, allows us to conduct business in an open and honest way. We require all staff, our suppliers and partners to abide by our policies and act responsibly in their commercial dealings to enable the organisations to foster an ethical corporate culture.

Our zero-tolerance approach to modern slavery in our business and supply chains is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced on an ongoing basis.

Our whistleblowing policy encourages and facilitates clear communication of misconduct and promotes an open and ethical culture within our organisation.

Risk Assessment and Mitigation

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

We recognise that ethical and productive partnerships with our suppliers strengthen our business, our reputation and that of our OEM partners, suppliers and customers. We treat all suppliers fairly and with respect and we expect them to know and agree to uphold our high standards of compliance and ethics set out in our Supplier Code of Conduct.

More than 90% of our direct supply comes from organisations that are, themselves, required to publish statements setting out the steps that they have taken in this regard. We review those statements periodically, where available, and will continue to do so.

Supply Chain

KINTO UK ensures that high standards of ethical conduct are reflected within its supply chain. We have in place commercial agreements which contain robust obligations in relation to modern slavery on all suppliers to comply with the Act. The terms and conditions which we engage with our suppliers on enable us to remain in control in the event of a supplier infringing modern slavery legislation.

Specifically, these obligations include complying with all anti-slavery and human trafficking laws, maintaining their own policies and procedures and reporting any incidents or suspected incidents to KINTO UK.

KINTO UK has updated and improved its new supplier assessments. It continues to review and adapt the information being requested as part of these assessments to ensure that the appropriate standards are being met.

Our approach not only requires that our suppliers hold themselves accountable but also requires they hold any subcontractors or other participants in their supply chain accountable to the same standard. This is achieved through implementing the requirement that they undertake annual auditing to prove their compliance with the Act.

Looking forward, we will continue to develop our T&C's to ensure that they are always up to date and afford maximum protection.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide mandatory e-training to our staff on an annual basis.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and our contractors comply with our values we have a dedicated compliance team, which consists of involvement from the following departments:

- Legal and Compliance;
- Human resources;
- Operations;
- Procurement; and
- Sales.

On-going commitment for Financial Year 2022/23

We have a responsibility to continue taking initiatives to combat acts of modern slavery and uphold the integrity of our brands. We are committed to the continuous development of our business procedures in order to provide clarity as to our expectations within our commercial dealings and supply chain. This is essential for the efficiency of our businesses and the maintenance of high health, safety and environmental standards that we set ourselves. We continue to encourage our employees, representatives and suppliers to be pro-active and reactive in their compliance with legislation and to work to the highest professional standards in order to help eradicate acts of modern slavery within our businesses and supply chain.

Further Supplier Audits

Over the next fiscal year, we shall continue our work to increase the surveillance of our supply chain by conducting further audits on key suppliers. Our compliance and procurement teams will continue to develop assessments and methodology to ensure that these values and standards are evidenced and maintained. This will also ensure that effectiveness of the steps taken can be measured.

This statement is approved by Matthew Rumble, CEO of KINTO UK Limited.

Matthew Rumble

Matthew Rumble (Aug 16, 2022 18:07 GMT+1)

Matt Rumble
Chief Executive Officer
KINTO UK Limited

Date of Signature: 16th August 2022