



KiNTO UK Limited

Modern Slavery Statement 2024

For the financial year ending 31st March 2024

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1. Introduction

KINTO UK Limited continues to implement and endorse responsible business practices to ensure compliance with all applicable modern slavery legislation and to uphold the integrity of our brand, “KINTO” and those of our parent and affiliate companies.

KINTO UK Limited is wholly owned by KINTO Europe GmbH. KINTO Europe GmbH was created as a joint venture between Toyota Financial Services Corporation and Toyota Motor Europe to enhance its portfolio with full-service leasing products for customers in Europe and to progress towards becoming a mobility services provider.

Toyota Motor Corporation, who own Toyota Financial Services Corporation and Toyota Motor Europe, has its head office in Japan. The Group has over 360,000 employees worldwide and operates in more than 170 countries and territories.

This statement, in compliance with s54 of the Modern Slavery Act 2015 (the “Act”), sets out the key activities KINTO UK Limited has undertaken for the financial year ending 31 March 2024 to combat modern slavery and human trafficking within our businesses and supply chains, including risk identification and mitigation.

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.

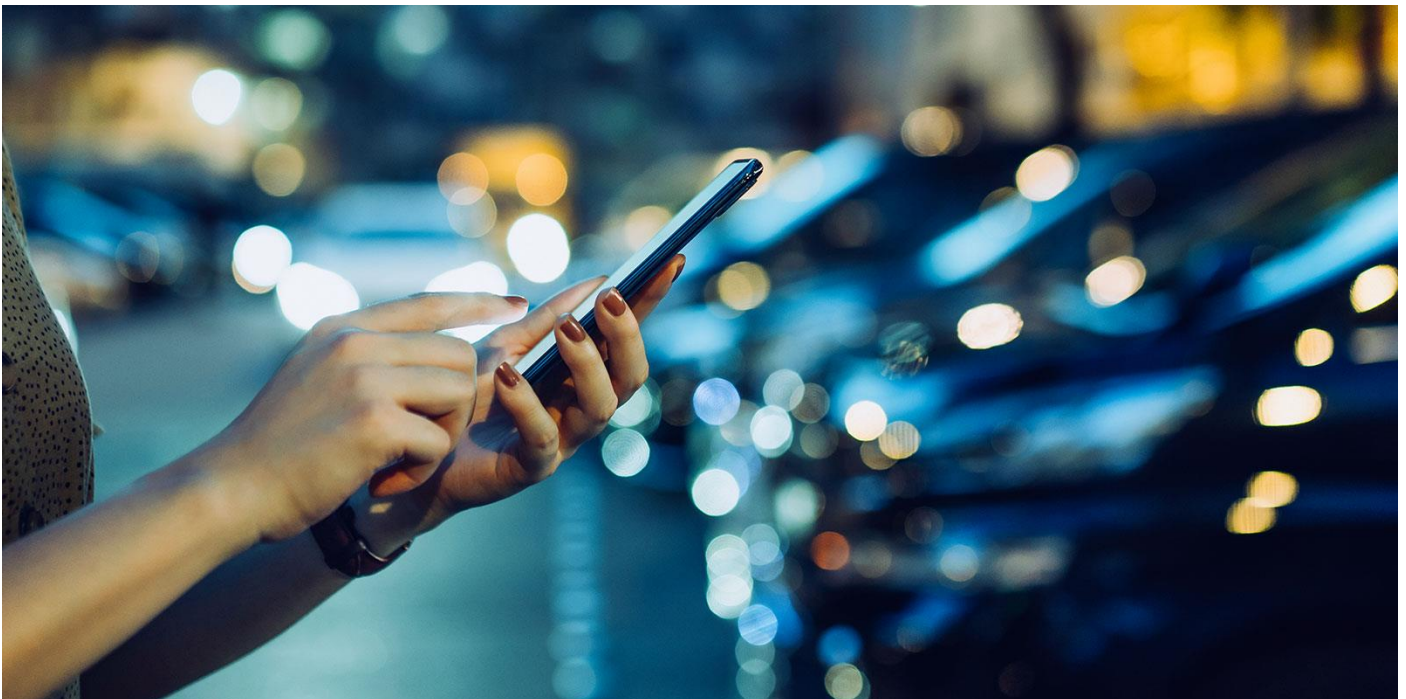
In 2023, there were 17,004 potential victims of modern slavery referred to the Home Office in the UK, which, whilst similar to the preceding year (16,921), was the highest annual number since the National Referral Mechanism began in 2009. The Government is particularly concerned that modern slavery could occur throughout an organisation’s procurement activities and highlight sectors such as mining, manufacturing construction, healthcare, and logistics to be high risk.

Despite the challenges in identifying modern slavery, there are often generic indicators present. While this is not exhaustive nor conclusive, these can help to identify potential victims. Victims may appear anxious or fearful and may isolate themselves from others. They could be threatened with violence, potentially having injuries that they are unable to explain to others. They may have very few possessions, including a lack or absence of normal identification documentation. Further, they may not be allowed or travel on their own or appear to be in a controlling relationship.

2. How We Operate

The principal activities of KINTO UK Limited (“KINTO UK”) are the provision of contract hire arrangements and fleet management services for motor vehicles in the United Kingdom, the disposal of contract hire vehicles on termination of contract and the development of mobility solutions for our customers.

We acquire our vehicles from manufacturers both directly and indirectly and sell our contract hire products using online channels, through brokers, directly and through an appointed retailer network. To support our fleet management and maintenance services, we use trusted partners such as tyre and glass suppliers, accident and fuel management companies and service, maintenance and repair suppliers. To help us support our customer’s needs, we utilise services such as IT, marketing and other professional services. We manage relationships with our suppliers, ensuring they share our values and work with us to uphold the integrity of our brand.



3. Our Policy on Anti-Slavery and Human Trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

Our Anti-Slavery and Human Trafficking Policy (“our Policy”) is reviewed, updated and approved by the Management Board at least annually. As well as reflecting legislative requirements, the Policy acknowledges our approach to being a good corporate citizen and reflects our commitment to acting ethically and with integrity in all our business relationships. We set high standards for our key stakeholders and implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.



Our Policy provides a clear, robust and accessible framework for all staff to observe and adhere to. We require all staff to read, understand and comply with our Policy to foster an ethical corporate culture. This ensures that we can instill our values and expectations on our suppliers and partners.

We also have the following policies in place to complement our Policy, which we regularly review and update:

- KINTO UK Terms of Engagement and Conduct
- KINTO UK Whistleblowing Policy
- KINTO UK Supplier Code of Conduct

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

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

4. Ensuring Due Diligence in the Supply Chain

KINTO UK endeavours to choose its business partners well and strives to ensure that high standards of ethical conduct are reflected within its supply chain. This means carrying out suitable and appropriate levels of due diligence at the commencement of a business relationship and ensuring our surveillance is maintained throughout our business dealings.

We require our suppliers to comply with our Supplier Code of Conduct in addition to establishing commercial agreements with appropriate contractual clauses where possible. Typically, 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's procurement procedures have recently been reviewed and enhanced introducing revised supplier criticality categorisation and an audit programme to conduct regular due diligence on all key suppliers in addition to the thorough evaluation process that takes place prior to contract commencement. We will continue to review and adapt the information being requested as part of these assessments to ensure that appropriate standards are being met.

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

To assist in ensuring all those in our supply chain and our contractors comply with our values we have a dedicated compliance team who monitor supplier performance and behaviour. Assistance is also provided by other departments such as Legal, Human Resources, Operations, Procurement, and Sales.



5. Risk Assessment and Mitigation

We are aware that there are certain sectors in our supply chain that give rise to the risk of modern slavery. These include manufacturing and certain service providers, such as vehicle valeting. 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 core services come from our key suppliers that are, themselves, required to publish statements in accordance with the Act setting out the steps that they have taken in this regard. We review key supplier statements periodically, where available, and will continue to do so.



6. Training

We recognise that our staff are essential in helping to mitigate the risks of modern slavery without our business and supply chain therefore we are proud of the comprehensive training we provide to all our staff. This training comprises of mandatory e-learning modules on anti-slavery and whistleblowing that is required to be completed during staff induction and biennially. This was last undertaken by all staff in July 2023 and is

designed to equip all staff with the awareness and skills to identify and report any acts of modern slavery, within and outside of the workplace.

7. Our ongoing commitment in combating slavery and human trafficking

Following the recent review of our procurement processes and policies, we will continue to expand our activities to improve our processes relating to human rights due diligence. This complements our wider objective of identifying and understanding then preventing or mitigating our sustainability risks comprehensively.

We intend to take further steps to increase the surveillance of our supply chain to cover all our key suppliers and introduce an appropriate programme for other significant service providers. Our compliance and procurement teams will continue to mature and develop our assessments and methodology to ensure that values and standards are evidenced and maintained. KINTO will continue to target and closely monitor the staff training KPI to ensure awareness about modern slavery issues is maintained.

Approved by Matthew Rumble, CEO of KINTO UK Limited.

Matthew Rumble

Matthew Rumble (Apr 2, 2024 11:21 GMT+1)

Matt Rumble
Chief Executive Officer
for and on behalf of the Board of Directors, KINTO UK Limited

31st March 2024