

APCOA (UK) LTD (APCOA) treats its obligation and responsibilities under Section 54 of the Modern Slavery Act 2015 as a business priority and recognises its commitment to tackling modern day slavery and human trafficking.

Modern slavery is the exploitation of other people for personal or commercial gain and can take many forms. APCOA conducts its business with a zero-tolerance approach and with effective systems to ensure that any potential risks can be promptly and effectively identified.

The information included in this statement applies to APCOA's financial year ending December 2022; to be reviewed again in December 2023, as required under the provisions of the Modern Slavery Act 2015 (the 'Act').

This statement outlines the steps and responsibilities APCOA takes in compliance with the Act to make sure that there is no slavery or human trafficking occurring within the Organisation. It also outlines the steps taken by APCOA to make sure that it is addressed and prevented within its supply chains so as to ensure that the same ethics and standards of APCOA are embraced by those organisations that supply things to it.

1. Our Business and Supply Chains

APCOA was established in 1971 as a parking management company and is now the UK's leading provider of tailored parking solutions. APCOA provides car park management services to a wide and varied clientele that includes local authorities, hospitals, and private sector clients, both large and small. As a result, it has limited supply chains for the goods and services it purchases.

Whilst the bulk of APCOA's business is carried out through the operating companies of APCOA (UK) LTD, Park & Control (UK) Limited and newly acquired Gemini Parking Solutions London Limited; other subsidiaries of the UK holding company (APCOA Holdings (UK) Limited) are also contractual counterparties to agreements for the supply of services to or by them, although most of the activities of those other companies are historical or legacy contracts. All UK companies in the group of companies of which APCOA Holdings (UK) Limited is the holding company have adopted this statement and will, in respect of their own activities, apply its terms and requirements.

2. Company Policies

APCOA's Human Resources department holds responsibility for anti-slavery initiatives within the company and has the following policies and procedures in place to support APCOA's approach to modern slavery not taking place within the business or within its supply chains.

- The Colleague Handbook - Our handbook details key areas of our policies and the expected standards of our employees, to ensure that good working practices are promoted and that we do the right things. The handbook summarises and provides direction on our Company Values, Dignity at work and Equality and Health and Safety.
- Business Ethics Policy - We expect the highest standards of business ethics, and that our employees comply with applicable laws and regulations. This Business Ethics Policy establishes the level of conduct and appropriate business practises expected of all colleagues.

- Code of Conduct – We aim to achieve sustainable growth whilst protecting the company, colleagues, and clients alike by conducting our business activities in accordance with the highest principles as this is an essential pillar of our long-term success. We are fully committed to upholding international agreements such as those aimed at protecting human rights, combating corruption, and promoting sustainability. This policy has been reviewed and redeveloped in 2021, to update and expand on APCOA's expectations and established rules of conduct to safeguard our company and colleagues.
- Recruitment and Selection Policy - We endeavour to treat all applicants fairly, objectively and in a consistent manner throughout the recruitment and selection process; and are committed to developing a strong and diverse workforce. The legal considerations of this policy include the regulations of Equality and Equal Opportunities, Data Protection, Asylum and Immigration and Equal Pay.
- Whistle Blowing Policy – Employees are encouraged to raise any concerns they have about the company's practices or any associated organisations if they become aware of any illegal, unethical, or negligent conduct, including the crimes of slavery and human trafficking.
- Anti-Slavery and Human Trafficking Policy – APCOA's newly acquired subsidiary, Gemini Parking Solutions London Limited, has an internal employee policy which will be adopted into APCOA's policies and procedures. Employees at all levels are encouraged and responsible for the prevention, detection, and reporting of modern slavery in any part of the business or within any associated supply chains.
- Health & Safety Policy – APCOA are committed to conducting all its business activities in a positive, proactive, responsible, and safe manner, whilst fully complying with Health and Safety Law and its general statutory obligations towards all employees.

All our policies are available to all colleagues at any time via APCOA's Intranet site.

3. Due Diligence Processes

Within APCOA's operations:

To ensure that there is no slavery or human trafficking within APCOA we protect all employees by making sure that they have:

- A contract of employment which sets out their rights and obligations, including the notice period required should they wish to terminate their contract with us.
- Verification of their identity and their right to work in the United Kingdom.
- A right to retain their identity documents and passport. We retain only copies of these during their employment.
- The legal amount of working time and statutory time off; to include any holiday entitlements, sickness and maternity / paternity and time off for personal emergencies.

Within our Supply Chain:

To help ensure that there is no slavery or human trafficking in its supply chain APCOA undertakes regular reviews to evaluate its suppliers for wider commercial reasons and continues to monitor each of those it selects as partners going forward. APCOA also carries out due diligence on all new suppliers prior to engagement and renews its due diligence of those suppliers on any renewal of an agreement with an existing supplier. Both of these are designed to ensure that slavery or human trafficking is not taking place within the supplier organisation or within its supply chains, thereby making sure that APCOA continues to meet the requirements of the Act on an ongoing basis.

APCOA continue to develop a self-certification system of compliance to evidence compliance from and by each of its suppliers. Responses to this certification request will be reviewed, and risk assessed. APCOA expect to use the results of this to direct further questioning and audits as necessary where higher risk activities have been identified.

In support of the self-certification system APCOA have developed its Supplier Code of Conduct which has been deployed this year. This Code of Conduct seeks to outline the proactive steps APCOA expects to be taken in its suppliers' own operations and supply chains, and confirmation that they treat workers fairly, provide safe working conditions, pay the minimum wage, and comply with all the applicable laws, mandatory industry standards and employment-related regulations.

In order to supply any goods or services to APCOA all new and existing suppliers are required to be registered as a preferred supplier and must confirm compliance with and acceptance of the Code of Conduct and to abide by its terms and conditions.

4. Managing Risk

APCOA's procurement programme is an ongoing operational activity and as part of the renewal of arrangements with its chosen suppliers APCOA has a process for including contractual obligations within the renewed contracts. These are augmented by the review of processes and acceptability of suppliers undertaken as part of that contract renewal process.

In future years these checks and/or audits will be linked with the supplier questionnaire responses to inform the risk assessment of each of our suppliers and further audits or other action will be taken as necessary when risk is identified. This additional action could be with a view to seeking to influence that supplier

into making appropriate changes within its supply chain or if that is not successful to seek to bring to an end APCOA's links with that supplier.

5. Performance Indicators

With the challenges that faced the Car Park Management sector during the pandemic throughout 2020 - 2021, there has been a drive to seek greater efficiency. This has resulted in APCOA hitting significant milestones in developing and expanding its use of technology in 2022 and harnessing the talent of its employees to deliver cost effective but resilient systems. We have asked our suppliers to do likewise and have worked with them to achieve this whilst making sure that all of this has been achieved within our legal and ethical framework.

Going forward with the continued challenges from the pandemic and its economic ramifications, the work that we are currently doing (as described earlier in this statement) will allow a more matrix centred approach and reporting mechanism.

6. Training and Communications

To raise awareness and understanding of the 'Act', colleagues who are involved in the management or procurement of services receive training through an e-learning course that is Continual Professional Development (CPD) certified. This enables the learner to identify and report any signs of any unethical practices they may encounter through the business and supply chain.

An annual review has been implemented to remind all colleagues of the need to be vigilant and how to report any suspected issues. This will be monitored as an ongoing practise. In addition, APCOA's Human Resources department works with various key colleagues to identify the skills of those individuals regarding their knowledge of the Modern Slavery Act 2015 and key indicators that a problem may exist with its suppliers. Where necessary or relevant, APCOA will continue to work with those colleagues to enhance their knowledge for the benefit of the entire business.

7. Plans for the coming year

In 2023, APCOA aim to continue to raise awareness of this matter so that it's employees and suppliers continue to remain aware of and compliant with the 'Act' in accordance with the guidelines and regulations.

Should there be any concerns regarding modern slavery, APCOA's Human Resources department will be notified, who will ensure that the relevant action is undertaken in accordance with APCOA's business obligations.

8. Board Approval

APCOA (UK) LTD's Board of Directors has approved this statement for the financial year ending 31st December 2022.



Kim Challis
Regional Managing Director – UK & Ireland & ESG Director