

Modern Slavery and Human Trafficking Statement 2025

SVAT Ltd
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(hereinafter also referred to as SIXT)

Modern Slavery and Human Trafficking Statement 2025

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 “Transparency in Supply Chains”. It is made by SVAT Ltd and is based on SIXT’s¹ global standards.

It states SIXT’s commitment to respect for human rights and international standards, gives an overview about SIXT’s organisation’s structure, business and supply chains, and describes the measures we have taken to minimise the risk of modern slavery and human trafficking within our operations and supply chains. It outlines our due diligence processes, preventive and mitigation measures to identify, avoid and mitigate risks, and presents SIXT’s reporting system and policies in relation to slavery and human trafficking.

1. COMMITMENT TO RESPECT FOR HUMAN RIGHTS AND INTERNATIONAL STANDARDS

SIXT is an international provider of high-quality mobility solutions.

Together with our franchisees and partners, we are present for our customers worldwide. SIXT strives for responsible and sustainable value creation across the entire business spectrum.

SIXT is committed to its human rights responsibility especially with regard to all forms of (modern) slavery and human trafficking.

SIXT also aligns its business activities with the following internationally applicable standards and guidelines in order to underline the anchoring of human rights within its own business area and in global supply relationships:

- the International Charter of Human Rights,
- the UN Guiding Principles on Business and Human Rights,
- the ten principles of the UN Global Compact,
- the ILO Declaration on Fundamental Principles and Rights at Work and its follow-up,
- the ILO core labour standards,
- the OECD Guidelines for Multinational Enterprises.

2. SCOPE AND EXPECTATIONS FROM EMPLOYEES AND SUPPLIERS

This statement sets out the overarching principles for respect of human rights that SIXT has anchored in its operations. We have communicated our expectations of ethical conduct in detail in the internal SIXT Code of Conduct and our Code of Conduct for Suppliers and Service Providers. The principles described apply wherever we operate. We want to behave ethically, socially and fairly everywhere.

The SIXT Code of Conduct obliges all employees, functions and managers to comply with it. It applies worldwide, even if in another country other principles are customary or tolerated. We expect our suppliers and service providers to follow the same principles. They should internalize our principles and promote them as actively as we do. Business partners who tolerate (modern) slavery and human trafficking will not be tolerated by us.

It is available under <https://about.sixt.com/en/responsibility/#compliancee>

For this reason, SIXT has adopted the Code of Conduct for Suppliers and Service Providers, which reflects SIXT’s basic principles and sets minimum standards for business relationships with SIXT.

It is available under <https://about.sixt.com/en/responsibility/#compliancee>

3. ORGANISATIONS STRUCTURE, BUSINESS AND SUPPLY CHAINS

¹ The designation SIXT includes SIXT SE and its affiliates including SVAT Ltd

SIXT SE, with its registered office in Pullach, Germany, is a listed European stock corporation (Societas Europaea) and serves as the parent and holding company of SIXT Group. SIXT SE performs key management and administrative tasks and is responsible for the strategic and financial management of SIXT Group. It also performs important financing functions for the Group. Therefore, there are many specialised departments, e.g. Vehicle Purchasing and Corporate Procurement, International Franchise Development, Marketing, (B2B) Sales, etc. In the UK, the operating business of SIXT Group is managed entirely by legally independent subsidiaries.

The most important purchasing item at SIXT is vehicles, which account for the vast majority of the goods and services purchased. In 2023, SIXT sourced close to three-quarters of its vehicles from European (environmentally certified) manufacturers. Further, there are suppliers which deliver other services and products (e.g. office supplies, insurance, logistic services etc.). While we primarily use our own employees to deliver services, we also work with our contractors for certain tasks such as cleaning and preparing our rental cars.

4. DUE DILIGENCE PROCESSES AND RISKS OF SLAVERY AND HUMAN RIGHTS TRAFFICKING

SIXT is fully committed to all human rights, also and especially with regard to all forms of (modern) slavery and human trafficking and undertakes to comply with them. We examine the possible human rights risks in our own business area and at our direct suppliers annually and on a case-by-case basis. The findings from this risk analysis serve as a basis for defining and, if necessary, adapting effective prevention and remedial measures.

In our own business unit and at our franchisees, the risk analysis is carried out using questionnaire and taking into account the abstract country risks. In the risk analysis for our suppliers, we first assess the risk abstractly by country and product group. If a certain risk threshold is reached (as well as taking into account the volume of turnover for individual areas), we examine the extent to which appropriate measures are required.

As part of the risk analysis described above no concrete risks for (modern) slavery and human trafficking were identified in SIXT's own business area or at our direct suppliers.

Primary responsibility for operational implementation is each department (e.g. Corporate Procurement, Vehicle Purchasing, Franchise and People & Culture). They are supported by the department Compliance & Integrity. The Human Rights Officer of SIXT SE monitors the compliance with human rights due diligence obligations of the Sixt Group. He is part of the Compliance & Integrity department which regularly informs the Management Board of SIXT SE or the management of the respective local entities on relevant human rights issues and any incidents.

SIXT is aware that the implementation of human rights due diligence obligations is an ongoing process. SIXT provides regular and transparent information on implementation and further developments as part of the formats provided for by law.

5. PREVENTIVE AND CORRECTIVE MEASURES

SIXT uses preventive and corrective measures to prevent potential risks regarding (modern) slavery and human trafficking.

Among other things, we sensitise our employees and franchisees to our corporate values and principles. Central to this is the SIXT Code of Conduct. All employees are familiarized in writing via the intranet with the Code of Conduct and the other internal requirements relevant to their area and their practical handling. In addition, relevant employees are trained on human rights.

When entering into new business relationships with suppliers or renewing contracts, we review them on a risk

basis with regard to potential human rights risks. A key instrument for making supply chains more sustainable is the Code of Conduct for Suppliers and Service Providers. It is SIXT's goal to oblige all business partners to comply with the standards referred to therein. SIXT expects that the obligations and standards from the Code of Conduct for Suppliers and Service Providers will also be passed on to the business partner's suppliers. By raising awareness and committing suppliers, concrete rules are created to implement human rights concerns throughout the supply chain. In order to maintain this claim, in the Code of Conduct for Suppliers and Service Providers, SIXT reserves the right to review these and to make use of appropriate control mechanisms (e.g. rights to information / audits) as well as to take further measures (e.g. terminations) depending on the identified risk.

The process by which we ensure compliance with our due diligence obligations to uphold human rights is continuously monitored and reviewed against the background of the development of our business activities or on a case-by-case basis (e.g. in the event of concrete indications of violations or changes in international laws and standards). If necessary, we will adapt the relevant processes and update our policies accordingly. If we determine that a violation of human rights in our own business or at a business partner has already occurred or is immanent, we will promptly take appropriate remedial action to prevent, terminate or minimise the extent of the breach.

6. REPORTING OF BREACHES

An appropriate and effective complaint management system is an important part of SIXT's human rights strategy. Compliance with human rights and environmental due diligence obligations can only succeed through open and clear communication and addressing grievances. We strive to raise awareness and knowledge about human rights issues among our employees and business partners and encourage them to voice their concerns without fear of reprisal.

Indications of misconduct can be reported, among other things, via SIXT's reporting system. This is possible by stating one's name or reporting anonymously. The reporting system can be reached here: <https://sixt.integrityline.com/>. It is available to SIXT employees, suppliers and other third parties and is communicated internally and externally.

The reported information also serves us as key performance indicators (KPIs) to measure the effectiveness of our due diligence measures by classifying and counting the reports received according to predefined subject areas (e.g. human rights).

7. RELATED POLICIES

The following SIXT policies in particular are directly relevant to the matter set out in this statement:

- SIXT Code of Conduct
- SIXT Supplier Code of Conduct
- Policy Statement regarding SIXT's Human Rights Strategy
- Buyer Code of Conduct
- SIXT Speak Up Guideline

This statement was approved and signed by the board of directors of SVAT Ltd in July 2025



Yvonne Gabler
Managing Director - SVAT
30th July 2025