MODERN SLAVERY POLICY

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, including slavery, servitude, forced and compulsory labour, and human trafficking, all of which involve the deprivation of persons liberty by another in order to exploit them for personal or commercial gain.

SVAT Ltd, trading as SIXT van & truck, takes a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships, as well as implementing and enforcing effective systems and controls to ensure modern slavery does not exist anywhere in our own business or in any of our supply chain.

We are also committed to ensuring transparency in our own operations and in our approach to combating modern slavery throughout our supply chain, in accordance with our disclosure obligations under the Modern Slavery Act.

We expect the same high standards from all of our contractors, suppliers, and other business partners, we will continue to include specific prohibitions against the use of forced, compulsory, or trafficked labour, as well as anyone held in slavery or servitude, whether adults or children, in our contracting processes, and we expect our suppliers to hold their own suppliers to the same high standards. To that end we request all new suppliers to complete a supplier questionnaire before we contract with them.

This policy applies to all individuals who work for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

Our business and structure

SVAT Ltd (company number SC620814), trading as SIXT van & truck, is a UK business primarily providing long-term van and truck rental to business customers. We have a board of directors located in the UK, supported by Operations, sales, marketing, finance and business management heads of department and circa 160 employees. We have branches UK wide, 8 in total, from Glasgow to Weymouth. Our registered office is Units 2&3, 13 Symington Drive, Clydebank Business Park, Glasgow, G81 2LD. SVAT Ltd, trading as SIXT van & truck, forms part of the SIXT SE group. This policy applies specifically to SVAT Ltd, its UK operations and associated supply chains.

Responsibilities

SVAT Ltd, trading as SIXT van & truck, is ultimately responsible for ensuring that this policy conforms with our legal and ethical commitments, as well as that all people under our control abide by it.

SVAT Ltd, trading as SIXT van & truck, is in charge of implementing this policy on a daily basis, monitoring its usage and effectiveness, dealing with any questions about it, and reviewing internal control systems and processes to ensure they are successful in combating modern slavery.

Management at all levels is responsible for ensuring that people reporting to them understand and comply with this policy, as well as that they get training on it and the subject of modern slavery in supply chains.

Risk identification, assessment and management

We are a UK-based business providing long-term van and truck rental to business customers. Our supply chain is made up of vehicle manufacturers and suppliers, maintenance, repair and bodyshop providers, vehicle delivery, collection and recovery providers, vehicle preparation and cleaning services, agency and temporary labour providers, and general business services such as facilities, IT and professional services.

Identifying risk. We review our business and supplier base at least annually, and whenever we enter a new supplier category, to identify where the risk of slavery and human trafficking is highest. We consider the nature of the work, the use of low-skilled or temporary labour, the location of the supplier and the sectors involved, and the length and complexity of the supply chain. Our current assessment is:

Area	Risk level	Why
Our own employees	Low	Direct UK employment with right-to-work checks, contracts of employment and payroll controls.
Agency and temporary labour providers	Higher	Reliance on third parties for recruitment and pay; labour-intensive and short-term work.
Vehicle cleaning, preparation, facilities and security services	Higher	Labour-intensive, low-wage sectors recognised as higher risk in the UK.
Delivery, collection, recovery and haulage providers	Medium	Use of subcontracted drivers and long working hours.
Maintenance, repair, tyre and bodyshop providers	Medium	Smaller independent workshops and use of subcontracted labour.
Vehicle, parts and component manufacturing (including batteries)	Medium (upstream)	Long, global supply chains with limited direct visibility beyond our first-tier suppliers.
IT, professional and office services	Low	Skilled, regulated workforces.

Due diligence processes

We use a risk-based approach to due diligence in our business and supply chains, with the level of checks matched to the level of risk. The steps we take to assess and manage risk include:

- **Supplier onboarding:** all new suppliers complete a supplier questionnaire, which includes modern slavery questions, before we contract with them. Answers that raise concern are followed up before any contract is agreed.
- **Contract terms:** our contracts include prohibitions on forced, compulsory and trafficked labour, and require suppliers to hold their own suppliers to the same standards.
- **Enhanced checks for higher-risk suppliers:** we ask for further evidence such as their own policy or statement, right-to-work and payment practices, and may carry out supplier reviews or visits.
- **Recruitment controls:** right-to-work checks are completed before any employee or agency worker starts, and we pay at or above the National Minimum Wage.
- **Raising concerns:** anyone who works for us, or on our behalf, can raise a concern about modern slavery in confidence with their manager or with the Head of Business Management & Transformation, and will not suffer detriment for doing so in good faith.
- **Responding to concerns:** every concern is recorded and investigated promptly. Where a supplier is found to be involved in modern slavery we require corrective action and, where this is not taken, we will end the relationship. Where appropriate we will report to the police or other relevant authorities.

Training and capacity building

We make sure our people can recognise and respond to the signs of modern slavery and human trafficking by providing modern slavery awareness training (delivered through our intranet platform – SIXT Campus) which is completed at induction and refreshed annually.

Effectiveness and key performance indicators (KPIs)

We measure how effective our steps are in ensuring that slavery and human trafficking is not taking place in our business or supply chains against the following indicators. Performance is reviewed at least annually by the Managing Director and the Head of Business Management & Transformation, and the results are used to update this policy and our risk assessment.

Indicator	Target
New suppliers completing the modern slavery supplier questionnaire before contracting	100%
New and renewed supplier contracts containing modern slavery clauses	100%
Higher-risk suppliers reviewed in the last 12 months	100%
Right-to-work checks completed before an employee or agency worker starts	100%
Employees and managers completing modern slavery awareness training (new starters within 3 months of joining; refresher annually)	100%
Concerns raised that are logged and investigated	100%, with outcome and any corrective action recorded
Confirmed cases of modern slavery in our business or supply chain	Zero; any case reported to senior management immediately
Policy and risk assessment reviewed	At least annually

Monitoring and measuring effectiveness

Performance against these indicators will be monitored through supplier onboarding records, contract reviews, recruitment compliance checks, training completion records and reported concerns. The results will be assessed annually by senior management to evaluate the effectiveness of our controls, identify areas for improvement and inform future actions. Where performance falls below the established targets, appropriate corrective measures will be implemented and monitored.

If an indicator is not met, the reason is recorded and a corrective action is agreed and tracked to completion by senior management.

DOCUMENT CONTROL	
Approved:	Robert Gorman, Head of Business Management & Transformation
Approved:	Yvonne Gabler, Managing Director
Version:	4.0
Date:	4th November 2026

Approved by Yvonne Gabler, Managing Director, SVAT Ltd (Trading as SIXT van & truck)

Signed: 

Date: 4/11/26