

Modern Slavery Act 2015

ALD Automotive Limited Slavery and Human Trafficking Statement

MESSAGE FROM MEL DAWSON, MANAGING DIRECTOR

For ALD Automotive Limited, being a responsible company lies at the heart of our business. Being responsible must be tangible in each of our decisions, positions and actions. Our mission is to offer the best vehicle leasing solutions to both corporate and consumer markets. Our success as one of the industry's leading service providers, relies on people, so respecting human rights and dignity is at the very core of our mission.

OUR GROUP

ALD Automotive Limited ("ALD") sits within the financial services arm of Societe Generale and is the operational leasing and fleet management business line of Societe Generale group. Societe Generale has a universal banking model based on complementary businesses around the world, (including retail banking, corporate and investment banking, financial services, insurance, private banking and asset management.)

ALD POLICIES AND PROCESSES

ALD has identified that there are two main areas of risk where there is a remote possibility of slavery and human trafficking; outsourced services and recruitment. The following ALD policies are currently in place and relevant to the prevention of slavery and human trafficking in these areas:

➤ Outsourced Services

ALD's Procurement policy allows for the analysis of prospective outsourced suppliers' ethics policies in the procurement process, with specific reference to slavery and human trafficking.

ALD will look to apply an annual slavery and human trafficking risk assessment on all of our essential outsourced suppliers.

➤ Recruitment

ALD's Recruitment policy provides for appropriate checks (including National Insurance checks, Inland Revenue registration checks, passport and bank account checks) to be conducted on all new staff members to ensure that they can legally work in the United Kingdom.

All employees are engaged on written terms which are UK law compliant, have a right to terminate their employment contract and are paid at least the National Living wage.

ALD's whistle blowing policy provides a framework for employees to report any concerns related to slavery and human trafficking in the activities of ALD.

GROUP POLICIES AND PROCESSES

As part of the Societe Generale group, ALD also follows Societe Generale's relevant Group-wide policies including:

- The Code of Conduct in which Societe Generale commits to respect human rights (including those relating to slavery and human trafficking) and to comply with the rules established by the International Labour Organisation;
- The Worldwide agreement on fundamental human rights and trade union rights signed between Societe General and UNI Global Union. Under this, we are committed to ensure fair working conditions, to prevent employment related discrimination; to respect all health and safety regulations and freedom of association;
- The Instruction on Conducting Responsible Sourcing & Compliance Rules Applicable to Sourcing (appended to the UNI agreement referred to above);
- The Instruction on Fight Against Money Laundering and Terrorist Financing within the Societe Generale Group;
- The Anti-Bribery and Corruption Policy; and
- The Environmental and Social Guidelines for Business Engagement.

SUPPLIER ADHERENCE TO OUR VALUES

In line with the Societe General Group Code of Conduct, ALD expects its suppliers and service providers to adhere to principles equivalent to those in the Group Code of Conduct, including respect for human rights and compliance with all applicable laws.

OUR SUPPLY CHAINS

Following a risk assessment of its supply chain, ALD does not believe that it has any suppliers that present a greater risk than "minimal risk" of slavery and human trafficking.

CONCLUSION

In view of the policies and processes outlined above, we have a framework that adequately safeguards ALD against slavery and human trafficking within its own business and that of its suppliers. We believe that there is a very low risk of slavery and human trafficking taking place within ALD or our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ALD's slavery and human trafficking statement for the financial year ending 2016.

On 5 May 2017



Mel Dawson

Managing Director

ALD Automotive Limited