

# **Enterprise Rent-A-Car European Holdings Limited**

## **United Kingdom Modern Slavery Act Disclosure Statement 2024**

### **Financial Year 2023**

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#### **Introduction**

Pursuant to the United Kingdom Modern Slavery Act 2015, Enterprise Rent-A-Car European Holdings Limited, on behalf of itself and its wholly owned subsidiaries, which include Enterprise Rent-A-Car UK Holdings Limited, Enterprise Rent-A-Car UK Limited, ERAC UK Finance Limited, Rental Claim Services Limited, S.H.B. Hire Limited, and Entegral Holdings Limited (hereafter referred to jointly as “ERAC,”) has prepared this statement to detail actions taken to understand potential forced labour and human trafficking risks related to our business and supplier network, and to document the steps taken to mitigate any such risk. This statement relates to activities during financial year August 1, 2022 – July 31, 2023.

#### **Company Structure**

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ERAC are indirect subsidiaries of Enterprise Holdings, Inc., and together with its affiliates, subsidiaries, and independent franchisees, make up a global transportation provider operating the Enterprise Rent-A-Car, National Car Rental, Alamo Rent a Car, Enterprise Car Club, Enterprise Flex-E-Rent, SHB Hire, Acklea, Walker Vehicle Rental, and Entegral brands. ERAC offers car hire and car-sharing services, commercial vehicle hire, repair payment and reimbursement processing, integrated software for automotive claims, and ancillary services in the UK. As a total mobility provider, ERAC serves the needs of a wide variety of businesses, consumers, and organisations. Principal elements of ERAC’s supplier network are original-equipment vehicle and parts manufacturers, after-market vehicle parts suppliers, repair garages, and electronic equipment manufacturers. To a limited extent, outsourced service providers constitute an element of ERAC’s supplier network.

#### **Company Policy**

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ERAC is committed to maintaining and enhancing processes and systems to ensure that forced labour and human trafficking are not taking place in our business or supplier network. In furtherance of that commitment, and as set forth below, we employ an integrated and comprehensive approach to assessing and mitigating these risks.

#### **Forced Labour and Human Trafficking Risk Areas**

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We continue to assess the risk to the ERAC business to be minimal. Within ERAC’s global supplier network, we believe there remains potential risk in the following areas: extraction of metal used in vehicles purchased from original-equipment manufacturers and equipment purchased from after-market suppliers; extraction of rubber in tyres used in our rental and leasing fleets; extraction of metal and minerals used in electronic equipment such as computers, tablets, and telephones, and assembly of same; manufacture of employee uniforms; use of independent contractors for car washing and logistics; and the harvesting of coffee purchased and provided to respective employees and customers.

## Due Diligence and Risk Mitigation Programme

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ERAC utilises a variety of means to execute on its anti-forced labour and human trafficking commitment. ERAC has adopted and supports all of these means within our own business.

### **Awareness**

The commitment begins with awareness of our anti-forced labour and human trafficking stance - awareness among employees, customers, business partners, suppliers, and franchisees:

- **Employee Code of Conduct** – ERAC has adopted an [Employee Code of Conduct](#) which contains explicit language regarding our anti-forced labour and human trafficking position. The Code is issued to and acknowledged every year by employees and accompanied by an interactive training module. The Code is posted on applicable websites, allowing access to the general public, our customers, and business partners.
- **Employee Recruitment Policies** – ERAC conducts [pre-employment screenings](#) which include Proof of Right to Work review. Additionally, there are policies and procedures in place to ensure adherence to local and national laws and prohibit discrimination, harassment, intimidation, and the confiscation of workers identification documents. ERAC has a pro-employee philosophy and allows for the freedom of workers to terminate employment, change positions, and seek association.
- **Supplier Code of Conduct** – ERAC has adopted the a [Supplier Code of Conduct](#) which contains anti-forced labour and human trafficking language mirroring that found in the Employee Code of Conduct. In this way, each of ERAC's suppliers is affirmatively advised of our position and expectation that our suppliers comply with such principles. New suppliers are provided the Supplier Code of Conduct during the on-boarding process.
- **Franchisee Code of Conduct** – Franchisees are expected to adhere to the same principles and hold to the same business values as ERAC. The [Franchisee Code of Conduct](#) contains anti-forced labour and human trafficking language similar to that found in Employee and Supplier Codes of Conduct.

### **Risk Assessment and Investigation**

ERAC has previously assessed potential forced labour and human trafficking supplier-network risk in the following areas: extraction of metal used in vehicles purchased from original-equipment manufacturers and equipment purchased from after-market suppliers; extraction of rubber used in vehicle tyres; extraction of metal and minerals used in electronic equipment, and assembly of same; manufacture of employee uniforms, use of independent contractors for car washing and logistics; and the harvesting of coffee provided to employees and customers.

ERAC previously assessed the *actual* risk in the above-referenced areas through a supplier policy and practices review (which as referenced in previous disclosure statements and included, in most cases, a review of published human rights and working condition statements, contract terms, and where necessary, supplier questionnaires and follow up) but based upon current year monitoring, the actual risk remains unchanged from prior years. ERAC determined the applicable suppliers adequately mitigated these risks through strong anti-forced labour and human trafficking positions, as well as detailed assessment, avoidance, and mitigation plans, addressing the sourcing of raw materials and assembly of products. In an effort to strengthen the way we identify, assess, and address modern slavery in our supply chain, we engaged in an exercise to evaluate and select a third-party software solution to help manage risks. A solution was selected and efforts are underway to purchase and implement the tool to enhance the risk assessment process over the next year.

## **Assurance**

- **Contracts and Agreements** – ERAC has developed standard contract language regarding the prohibition of forced labour and human trafficking and is including it in its contracts with suppliers of goods and services based on risk. Such language has also been made an element of new franchise agreements.
- **Reporting Mechanism** – ERAC utilises a third party-administered hotline to allow for anonymous reporting of ethics and compliance concerns. The hotline web portal allows reporting not only from employees, but from customers, suppliers, and business partners as well. To afford greater visibility to the forced labour and human trafficking issue, a standalone “Forced Labour and Human Trafficking” category is included in the list of matters for which reports can be submitted. The availability of the hotline is made known to our suppliers by way of reference in the Supplier Code of Conduct. It is also made known to franchisees by similar reference in the Franchisee Code of Conduct. No incidents were related to modern slavery concerns were raised through our reporting mechanism or other internal channels.

## **Training**

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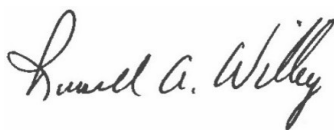
As noted above, ERAC issues annual Code of Conduct training to employees. This comprehensive course presents and tests knowledge of the company’s anti-forced labour and human trafficking policy and practices.

## **Conclusion**

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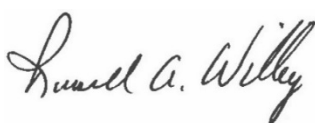
ERAC continues to fully support the principles underlying the United Kingdom Modern Slavery Act and remains committed to the operation of a business—both directly and through our supplier network—free from the presence of forced labour and human trafficking. To date we have found no direct evidence of forced labour and human trafficking activity or risk in our business or supplier network. Going forward, leveraging the progress made over the past several years, we will continue to drive awareness of our anti-forced labour and human trafficking position with employees, suppliers, business partners, franchisees, and customers; examine our business and supplier network for risk; and aggressively respond to and address risk or evidence of forced labour or human trafficking.

Adopted on behalf of Enterprise Rent-A-Car European Holdings Limited on 31/07/2023.



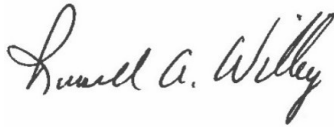
Russell A. Willey  
Director

Adopted on behalf of Enterprise Rent-A-Car UK Limited on 31/07/2023.



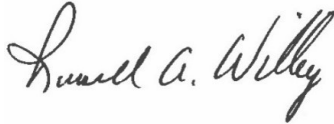
Russell A. Willey  
Director

Adopted on behalf of ERAC UK Finance Limited on 31/07/2023.



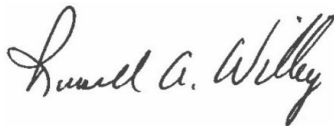
Russell A. Willey  
Director

Adopted on behalf of S.H.B. Hire Limited on 31/07/2023.



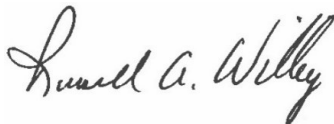
Russell A. Willey  
Director

Adopted on behalf of Entegral Holdings Limited on 31/07/2023.



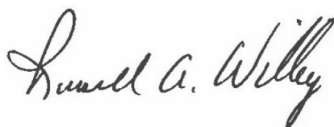
Russell A. Willey  
Director

Adopted on behalf of Rental Claims Service Limited on 31/07/2023.



Russell A. Willey  
Director

Adopted on behalf of Enterprise Rent-A-Car UK Holdings Limited on 31/07/2023.



Russell A. Willey  
Director