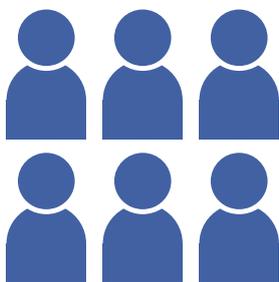




MODERN SLAVERY ACT STATEMENT

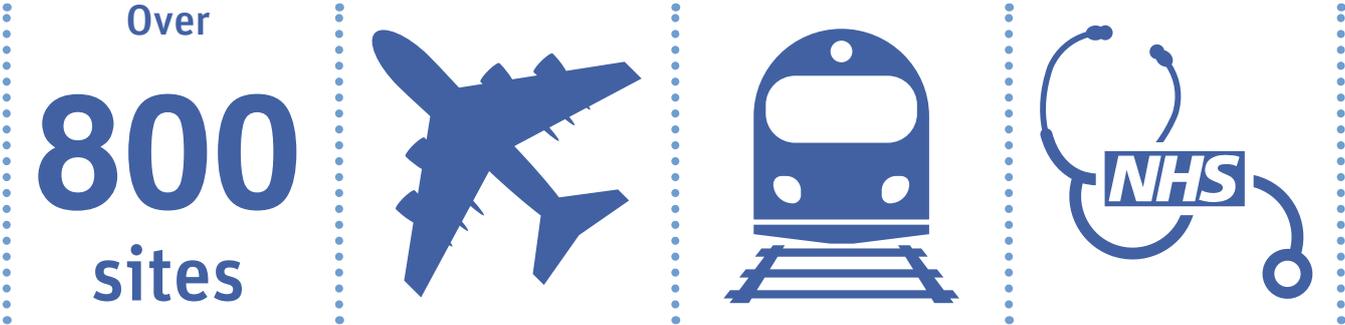
APCOA Parking treats its obligations under the Modern Slavery Act 2015 as a business priority.



Over
2,100
employees

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. The bulk of its business is carried out through the operating company of APCOA Parking (UK) Limited, but other subsidiaries of the UK holding company (APCOA Parking Holdings (UK) Limited) are also contractual counterparties, although most of their activities are historical or legacy contracts.

Prior to the implementation of the Act, APCOA undertook a review of its suppliers for wider commercial reasons and continues to monitor each of those it selected as partners



**across off-street, airports, rail, & the NHS
with many more locations in partnership with local authorities**

going forward. We have recently implemented a system to seek self-certification of compliance from each of our suppliers and the responses to these will be reviewed and risk assessed. We expect to use the results of this to direct further questioning and audits as necessary where higher risk activities have been identified.

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.

In addition, our 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 renewal contracts and these are augmented by the review of process 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 are identified. This additional action could be with a view to either seeking to influence that supplier into making appropriate changes within its supply chain or to bring to an end APCOA's links with that supplier.

In terms of its own employees it complies with its obligations under the National Minimum Wage legislation and undertakes pre-employment checks as required by legislation to confirm the ability of its employees to work in the United Kingdom and their suitability for the job for which they have been recruited.

In addition, the HR department is working with various key employees to identify the skills of those individuals with regard to their knowledge of the Modern Slavery Act 2015 and key indicators that a problem may exist with its suppliers. Where necessary or relevant, it will be working with those employees to enhance their knowledge for the benefit of the business.