

Tackling Modern Slavery

This statement is made pursuant to the United Kingdom's Modern Slavery Act 2015, section 54. It constitutes Keyloop's modern slavery & human trafficking statement for the 2023 financial year which ended 31 December 2023. It is intended to cover all entities within the Keyloop group.

Introduction

Forced, bonded or compulsory labour, human trafficking and other kinds of slavery and servitude represent some of the gravest forms of human rights abuse in any society.

We will not tolerate any such activities within our own Keyloop operations or within our supply chain and are committed to taking appropriate steps to ensure that everyone who works for Keyloop – in any capacity, anywhere in the world, benefits from a working environment in which their fundamental rights and freedoms are respected.

Within our statement we report on our efforts to prevent modern slavery in line with the requirements of the UK Modern Slavery Act (2015). We remain focused on the rights and wellbeing of the people who work for Keyloop and for our suppliers.

Our Statement provides details of our policies, our approach, and the actions we have taken in the 2023 financial year to further strengthen our programme and commitment to respect and uphold people's fundamental rights and freedoms.

Our Business

Keyloop's mission is to create and connect technology that advances the car buying and ownership experience in partnership with dealers and OEMs. It is a leading global provider of software solutions to the auto retail industry, serving approximately 18,000 dealer sites and most automotive manufacturers, in 100 countries. Headquartered in the UK, Keyloop also has operations across EMEA, Asia and North America.

Our Supply Chain

Keyloop uses our suppliers' authorised network of affiliates and distributors throughout the world. Every new supplier goes through our supplier set-up process, which involves review by a number of Keyloop teams (for example Legal & Compliance and Procurement) to ensure that a suitable contract is in place.

Our Principles, Codes & Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Supplier Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We take the following steps to achieve this commitment:


1. Keyloop's policy is to require all suppliers to adhere to Keyloop's Supplier Code of Conduct (or, exceptionally, the supplier's own code of conduct provided that this incorporates substantially similar requirements and is vetted by our Procurement and Legal & Compliance Teams);
2. Keyloop issues Training to all employees specific to Modern Slavery
3. Keyloop provides guidance through an Employee Code of Conduct so that all employees understand Keyloop's values and how we do ethical business; and
4. Keyloop maintains a Whistleblowing Policy which sets out how employees can raise concerns without fear of retaliation. Employees can confidentially report concerns which may include modern slavery and human trafficking issues. These reports are then investigated in accordance with Keyloop's policies and procedures.

Annual Reviews

Keyloop periodically reviews the effectiveness, of our processes and systems and any changes will be reflected in future annual statements.

Approvals

This statement was approved by the Keyloop Holdings (UK) Limited Board of Directors in March 2024 and is signed on their behalf by our CEO.

A handwritten signature in black ink, appearing to read 'Tom Kilroy', is written over a horizontal line.

Tom Kilroy
CEO, Keyloop