

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 2024 financial year which ended 31 December 2024. 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.

This statement outlines our actions to prevent modern slavery in accordance with 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 dealer sites and many automotive manufacturers in more than 100 countries. Headquartered in the UK, Keyloop also has operations across EMEA, Asia and North America.

Our Supply Chain

Keyloop utilises an authorised network of affiliates and distributors from our suppliers globally. Each new supplier undergoes a comprehensive set-up process, which includes reviews by various Keyloop teams such as Legal & Compliance and Procurement, to ensure that an appropriate contract is established.

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 has a Whistleblowing Policy and introduced a new Third-Party Whistleblowing platform to support confidential reporting. Employees can report concerns, including those about modern slavery and human trafficking, without fear of retaliation. These reports are investigated according to Keyloop's policies.

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 April 2025 and is signed on their behalf by our CEO.

Tom Kilroy
CEO, Keyloop