

## The AA's Modern Slavery Act Statement for the year ended 31 January 2023

AA Limited and its subsidiaries (the AA or the Group) provide roadside assistance, driving services and insurance products to customers in the UK. The AA is one of the most widely recognised and trusted brands in the UK, building on more than 115 years of service provision and innovation. We are proud of our history of protecting the motorist and making our roads safer.

The AA has a policy of zero tolerance towards acts of modern slavery which are unlawful or are a violation of fundamental human rights. We are committed to acting ethically and to ensuring that we have effective systems and controls in place to mitigate the risk of modern slavery occurring in our operations and supply chains. This statement, relating to the financial year ending 31 January 2023, is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act).

### **Our business**

The AA is the UK's leading provider of roadside assistance, with around 2,700 patrols attending an average of over 8,700 breakdowns daily. The AA has more than a 40% of the UK consumer market and over 60% of the business-to-business market. We aim to differentiate ourselves from our competitors by our leading brand and market position, excellent standards of service, strategic investments in our digital proposition and by training and developing the best people. We have a growing insurance business and are well placed to capture market share through our proprietary data, strength of brand and scale. Our insurance broking business focuses primarily on motor and home policies, operating a diverse panel of underwriters including our in-house underwriter. Full details of our businesses and subsidiaries are set out in our 2023 Annual Report and Accounts, which is available on our corporate website.

### **AA Policies and Codes**

The AA's business model puts people, safety and the environment at its core. This is reinforced through our policies, management and training. The AA's Policy Committee oversees an effective, auditable and systematic process for the creation and review of all policy documentation.

The commitment to our role in eradicating modern slavery in commercial supply chains is embedded into relevant policies and codes, which are aligned with our values and created to ensure effective working practices. They include:

- Our **Sustainability and Corporate Social Responsibility Statement**, which sets out our commitment to running our business in a responsible, ethical and sustainable way. Our ESG report can be found [here](#);
- Our **Supplier Code of Conduct** (the Code), which sets out the high standards we expect our suppliers to adhere to and contains specific provisions against the use of forced, bonded or compulsory labour;
- Our **Outsourcing and Third Party Supplier Policy**, which sets out our commitment to high standards for the fair and ethical treatment of employees, customers and suppliers and supports the procedure for engaging with suppliers to ensure beneficial and ethical terms of business; and
- Our **Financial Crime Policy**, an internal document, which sets out the framework that applies within the AA Group to identify, manage and mitigate exposure to financial crime. This is relevant as modern slavery offences are often linked to money laundering and financial crime.

Enhanced disclosure on relevant internal policies is provided on pages 50 and 51 of the 2023 Annual Report and Accounts to meet the requirements of the Non-Financial Reporting Regulation.

We have introduced an SRM (supplier relationship management) program since 2022 for our critical and strategic suppliers thereby including policy compliance as a topic of the business reviews.

### **Our people and supply chains**

The AA employs around 7,000 people in locations across the UK who carry out a broad range of roles within Road Operations, Contact Centres and at our Head Office. Our HR processes ensure that those recruited, including through employment agencies, have appropriate approvals to work. Approximately 38% of our people are employed as patrols.

We have a contracted network of over 900 third-party garages who support us when we are unable to make repairs at the roadside, provide coverage in areas which we are not able to reach and offer services to customers through Prestige, our in-house service, maintenance and repair (SMR) platform. We inspect over 90% of these garages on annual basis and no issues related to modern slavery were reported during FY23.

Used Car Sites Limited, a 100% owned subsidiary of the AA, has contracts with 1,800 dealer groups for the advertisement of used cars. All dealers sign up to the AA dealer promise to ensure they meet required standards and are visited by an AA representative who assesses their suitability to advertise under the AA brand. All dealers within our network are monitored by an account management team to ensure standards are met.

Our business operations are supported by over 1,500 suppliers that provide a wide range of goods and services. Our direct supply chain is predominantly UK based, though some suppliers are based abroad. Many of these direct suppliers have their own extensive supply chains. Our standard terms and conditions require our suppliers to adhere to all applicable legislation and make specific reference to the Act.

### **Supplier Management**

The AA's procurement team is a centralised head office function that assumes responsibility for the governance of the AA's purchasing requirements. In the 2023 financial year, the procurement team conducted detailed analysis of suppliers, which make up circa 80% of total supplier spend (excluding garages). The AA's on-boarding process involves vetting its suppliers to all of its business operations to ensure the required governance is in place and, for garages, an annual onsite inspection is carried out to ensure there is evidence of compliance. These suppliers have been rated according to factors such as main country of operations, spend levels, type of goods/services being supplied and knowledge of the company and its ongoing supply chain. This data is being used to ensure a consistent approach is implemented to managing our supply chain according to the risk they pose to the AA.

The AA reviews the AA's suppliers on a periodical basis. The supplier onboarding process requires new suppliers to answer a series of questions and provide supporting evidence, including commitment to and adherence to the Code. New suppliers also have to confirm that the behaviours and ethics we demand of them with regards to modern slavery and human trafficking will be met. Once populated and returned, specialist approvers from across the business are required to review and approve each supplier before the supplier can work with the AA.

## **Risk review**

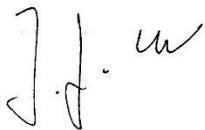
The AA's Group Risk function facilitates the Risk Management framework providing operational support and challenge of design and operation of the business' risks and controls. The team check and challenge risk events reported by the business and provide support in considering the actions to remedy, identifying root cause and additional controls which may be required. Group Risk oversees the business-led activities and gives assurance that appropriate mitigating activities are in place. Controls are tailored to suit the relevant business area and are subject to quarterly Risk and Control Self-Assessment. Any material risks or issues are escalated to Executive level and considered at applicable Committees and Boards, including the Executive Risk and Compliance Committee, which is held on a monthly basis. No incidents of modern slavery have been reported since the last Modern Slavery Statement published for the year ended 31 January 2023.

## **Training**

It is important that our colleagues and suppliers understand what Modern Slavery is and how they can escalate any concerns. A revised Whistleblowing Policy and procedure was published in September 2022 which encourages AA employees to voice concerns and details the various channels our people can use to speak up. Victimisation or harassment of anyone who raises concerns in good faith and in accordance with the Whistleblowing Policy will not be tolerated at the AA. The AA has also launched a dedicated training program for new employees recruited at management level, to raise awareness of the Act, the Code and the AA's commitment to mitigating the risk of modern slavery in supply chains.

## **Monitoring our effectiveness**

This statement demonstrates the AA's commitment to helping eradicate modern slavery from the global supply chain and has been reviewed and approved by the Board of AA Limited on 22 June 2023. We look forward to reporting on our progress next year.



Jakob Pfaudler, Chief Executive Officer

AA Limited

Date: 24 July 2023

This is a Group statement covering AA Limited and its applicable subsidiary entities which operate in the UK and have an annual turnover exceeding £36 million, this being Automobile Association Developments Limited, Automobile Association Insurance Services Limited, AA Brand Management Limited, AA Corporation Limited, AA Intermediate Co Limited and Drivetech (UK) Limited.