

# Statement on Modern Slavery and Human Trafficking

## Introduction

This Statement outlines the steps that Arval UK Limited (Arval UK), as part of the BNP Paribas Group (Group), has taken to ensure that human trafficking<sup>1</sup> and modern slavery<sup>2</sup> are not taking place in its business or in any of its supply chains. It also refers to the risk management processes that the Group has put in place in the context of its financing and investment activities, which govern the potential cases of human rights violations that may affect the activities of its clients. This Statement is for the financial year ended 31 December 2025.

The Board attest annually that Arval UK Limited complies with this Statement through the information provided by the respective departments of Sustainability, Procurement and Legal.

## The BNP Paribas Group

With its integrated and diversified model, BNP Paribas is a leader in banking and financial services in Europe. The Group leverages on strong customer franchises and business lines with strong positions in Europe and favourable positions internationally, strategically aligned to better serve customers and long-term partners. It operates in 64 countries and employs 177,990 Full-Time Equivalent workforce, excluding employees from AXA IM activities<sup>3</sup>.

It holds key positions in its three main areas of activity; Corporate and Institutional Banking (personalised solutions for corporate and institutional customers), Commercial, Personal Banking & Services (network of commercial and personal banks in the Eurozone, and the Europe-Mediterranean zone, as well as some of the Group's specialised business lines<sup>4</sup>), and Investment & Protection Services (expertise in savings, investment and protection solutions).

## About Arval UK

Arval UK, part of the Arval Group, is a provider of full-service vehicle leasing and a specialist in mobility solutions. As a BNP Paribas Group company, Arval UK funds over 200,000 cars and vans in the UK at the end of December 2025. Focused on customer experience, Arval UK has specialist teams dedicated to supporting a broad range of customers including individuals and small businesses with a single vehicle, through to

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<sup>1</sup> The expression "human trafficking" means: "Recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation", United Nations Convention against Transnational Organized Crime"

<sup>2</sup> Slavery is the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised" United Nations Convention on Slavery.

<sup>3</sup> The Group has 180,994 headcounts in FTE including employees from AXA IM activities.

<sup>4</sup> Arval, BNP Paribas Leasing Solutions, BNP Paribas Personal Finance, BNP Paribas Investors, new digital business lines (Nickel, Floa).

FTSE 100 companies with thousands. It provides a comprehensive range of flexible solutions, products and services including vehicle funding, vehicle maintenance, accident management, breakdown service, short- and medium-term rental, insured lease vehicles, full outsourcing salary sacrifice and consultancy services.

For more information visit [www.arval.co.uk](http://www.arval.co.uk)

## Risks of modern slavery and human trafficking

Academic studies, field investigations and recent news coverage have all clearly demonstrated that all sectors, industries and areas may be affected, to varying degrees, by these types of serious infringements to human rights.

The risk-assessment processes Arval UK implements to address the risks of modern slavery and human trafficking take into account the different situations of its stakeholders and is complemented by ad hoc monitoring and regular discussions performed by Group teams on this subject.

## Arval UK policy on modern slavery and human trafficking

Respect for human rights is one of the pillars on which BNP Paribas' CSR strategy is based and, as part of the Group, Arval UK has committed itself to the promotion of the following principles and standards that form the basis of its activities:

- The United Nations Sustainable Development Goals;
- The Ten Principles of the United Nations Global Compact;
- The United Nations Guiding Principles on Business and Human Rights (United Nations Guiding Principles);
- The internationally accepted OECD Guidelines for multinational enterprises;
- The internationally accepted standards of human rights, as defined in the International Bill of Human Rights;
- The core labour standards set out by the International Labor Organization.

These public commitments are backed by internal policies implemented at Group level, with the goal of handling the many subjects revolving around social, environmental and governance matters, including human rights. These policies include:

- The BNP Paribas Group Code of Conduct
- The BNP Paribas and Human Rights
- The BNP Paribas Sustainable Sourcing Charter
- The BNP Paribas Asset Management Responsible Business Conduct Policy
- The BNP Paribas Responsible Business Principles

Early and efficient identification of modern slavery risks is the first step towards its prevention, alleviation and remediation, and this calls for specific policies and practices. In this regard, Arval UK has taken the following steps and actions:

## **Towards its employees**

Arval UK is committed to providing a working environment in which all employees are treated fairly and with respect. In particular, the Group focuses on respect and the need to apply stringent norms of professional behaviour; Arval UK rejects all forms of discrimination.

In addition, the Group's policies and procedures notably include a diversity and inclusion policy as well as fair remuneration principles (excluding any form of discrimination) at the time of recruitment and during employees' tenure within the Group. Arval UK are a Living Wage employer. The BNP Paribas Code of Conduct, which applies to all employees, reaffirms the Group's commitment to ensuring good behaviour and combating disrespectful behaviour towards individuals. Arval UK's "Respect for People" policy aims to combat inappropriate behaviour, in particular, harassment and discrimination. Thus, every employee within the Group has to treat all individuals with respect, to ensure that interactions with them are professional, to listen, and to consider their contributions, even if they express different opinions.

## **Awareness and Training**

BNP Paribas took part in the development of an awareness-raising e-learning module called "Human Rights into Business", co-created with the other members of the French association Entreprises pour les Droits de l'Homme (Businesses for Human Rights – EDH). This e-learning is available in eight languages and freely accessible to all Group employees.

## **Raising concerns**

BNP Paribas Group pays particular attention to the concerns of customers, employees, shareholders, suppliers and society as a whole. The Group is committed to listening, understanding and seeking to respond to the concerns raised by its stakeholders in a fair and effective manner.

Arval UK employees are required to report any breach or suspected breach of laws, regulations, the Code of Conduct, Group policies or procedures. Raising an alert is a right and no employee may be sanctioned, dismissed or discriminated against, either directly or indirectly, for raising an alert in good faith.

As part of the "Respect for Persons" policy aimed at preventing discrimination, harassment and violence at work, the Group has initiated several actions, including measures to inform and raise awareness among employees and managers. Employees can report issues via a single and secure platform, the BNP Paribas Whistleblowing Platform, or, for alerts not in relation to the "Respect for Persons" policy, to their line manager or another manager, or directly to an Arval UK Whistleblowing referent.

The framework implemented by the Group includes both prevention measures (the awareness-raising module "Diversity, Equity and Inclusion", assignment of an annual objective relating to the Code of Conduct, training of managers on their roles and duties)

and remediation (disciplinary and accompanying measures, monitoring over time and protection against retaliation).

Any violation or suspected violation of human rights in the context of the Group's activities or its suppliers may be reported in the Group's whistleblowing system, except if local regulations or procedures prevent this.

The Whistleblowing Policy guarantees employees exercising their right to raise an alert, protection against retaliation for having raised an internal alert in accordance with the terms of the policy.

### **Workforce's inherent risks**

Concerning Group employees, the risks of modern slavery and human trafficking were considered very low.

### **Towards its suppliers**

Within the Group Procurement Function, dedicated teams address ESG risks linked to suppliers and subcontractors through the following framework:

- A responsible purchasing policy that aligns the Function's objectives with the Group's CSR objectives, as expressed in the Group purpose;
- The definition by the Function of a normative reference framework. This framework includes:
  - a "Sustainable Sourcing Charter", setting out the reciprocal commitments of the Group and its suppliers and subcontractors from an environmental and social standpoint. This Charter commits suppliers to promote these principles towards their own suppliers and subcontractors and have them comply with these standards.
  - contracts covering requirements on environmental and social criteria which, since 2018, have also included the option of ending contractual relations if suppliers do not comply with the Group's ESG requirements
  - ESG questionnaire templates used to assess ESG risks (Generic Due Diligence) when entering into relationships with external suppliers representing a contract value of more than EUR 200,000 (from the first euro for outsourced service providers), and during calls for tenders (assessment of ESG performance with a minimum weighting of 15% of ESG criteria); the use of ESG evaluation questionnaires in calls for tenders and the inclusion of their results in the overall assessment of suppliers are included in the Procurement's control plan;
  - supplier monitoring rules, targeting ESG criteria used during the selection process and completed by the thematic regulatory watches and external ESG ratings
  - training for employees of Procurement

## Suppliers' inherent risks

Arval UK's supply chain includes vehicle manufacturers and dealers, vehicle logistics companies, service, maintenance and repair suppliers, vehicle rental and tyre suppliers, as well as general supporting suppliers across functions such as IT, professional services and marketing.

## Assessing effectiveness

Acknowledging the challenges of assessing and addressing modern slavery and human trafficking issues, Arval UK remains committed to the review and enhancement of its own processes and policies in order to continually improve their range and effectiveness.

## Conclusion

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes Arval UK's modern slavery and human trafficking statement for the financial year ending 31 December 2025<sup>5</sup> and is owned and approved by the Board of Directors of Arval UK Limited.



**Lakshmi Moorthy – Managing Director of Arval UK Ltd**  
**May 2026**

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<sup>5</sup> Arval UK also publishes its statement on modern slavery and human trafficking on the modern slavery statement registry, a platform launched by the UK Government in March 2021.