

# **Enterprise Rent-A-Car European Holdings Limited**

## **United Kingdom Modern Slavery Act Disclosure Statement**

**Financial Year 2022**

### **Introduction**

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Pursuant to the United Kingdom Modern Slavery Act 2015, Enterprise Rent-A-Car European Holdings Limited, on behalf of itself and wholly owned subsidiaries Enterprise Rent-A-Car UK Limited and ERAC UK Finance Limited, hereafter referred to jointly as “ERAC,” has prepared this statement to detail actions taken to understand potential forced labour and human trafficking risks related to our business and supplier network, and to document the steps taken to mitigate any such risk. This statement also includes subsidiaries of Enterprise Rent-A-Car UK Limited, S.H.B Hire Limited and Entegral Holdings Limited. This statement relates to actions and activities during financial year August 1, 2021 – July 31, 2022.

### **Company Structure**

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ERAC is an indirect subsidiary of Enterprise Holdings, Inc., and together with its affiliates and subsidiaries (“Enterprise Holdings”), is a global transportation provider which, through a network of subsidiaries and independent franchisees, operates the Enterprise Rent-A-Car, National Car Rental, Alamo Rent a Car, Enterprise Car Club, Enterprise Flex-E-Rent, SHB Hire, Acklea, Walker Vehicle Rental, and Entegral brands. ERAC offers car hire and car-sharing services, commercial vehicle hire, repair payment and reimbursement processing, integrated software for automotive claims, and ancillary services in the UK. As a total mobility provider, ERAC serves the needs of a wide variety of businesses, consumers, and organisations. Principal elements of ERAC’s supplier network are original-equipment vehicle and parts manufacturers, after-market vehicle parts suppliers, repair garages, and electronic equipment manufacturers. To a limited extent, outsourced service providers constitute an element of ERAC’s supplier network.

### **Company Policy**

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ERAC is committed to maintaining and enhancing processes and systems to ensure that forced labour and human trafficking are not taking place in our business or supplier network. In furtherance of that commitment, and as set forth below, we employ an integrated and comprehensive approach to assessing and mitigating these risks.

### **Forced Labour and Human Trafficking Risk Areas**

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Pursuant to an analysis conducted by Enterprise Holdings, Inc., of exposure to industries, geographic regions, labour forces, and products in which forced labour and human trafficking are known to occur, we continue to assess the risk to the ERAC business to be minimal. Within Enterprise Holdings’ global supplier network, we believe there remains potential risk in the following areas: extraction of metal used in vehicles purchased from original-equipment manufacturers and equipment purchased from after-market suppliers; extraction of rubber in tyres used in our rental and leasing fleets; extraction of metal and minerals used in electronic equipment such as computers, tablets, and telephones, and assembly of same; manufacture of employee uniforms; use of independent contractors for car washing and logistics; and the harvesting of coffee purchased and provided to employees and customers.

## Due Diligence and Risk Mitigation Programme

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Enterprise Holdings utilises a variety of means to execute on its anti-forced labour and human trafficking commitment. ERAC has adopted and supports all of these means within our own business.

### **Awareness**

The commitment begins with awareness of our anti-forced labour and human trafficking stance—awareness among employees, customers, business partners, suppliers, and franchisees:

- **Employee Code of Conduct** – ERAC has adopted the Enterprise Holdings [Employee Code of Conduct](#). It contains explicit language regarding our anti-forced labour and human trafficking position. The Code is issued to and acknowledged every year by employees and accompanied by an interactive training module. The Code is posted on Enterprise Holdings' website, allowing access to the general public, our customers, and business partners.
- **Employee Recruitment Policies** – ERAC conducts [pre-employment screenings](#) which include Proof of Right to Work review. Additionally, there are policies and procedures in place to ensure adherence to local and national laws and prohibit discrimination, harassment, intimidation, and the confiscation of workers identification documents. ERAC has a pro-employee philosophy and allows for the freedom of workers to terminate employment, change positions, and seek association.
- **Supplier Code of Conduct** – ERAC has adopted the Enterprise Holdings' [Supplier Code of Conduct](#). It contains anti-forced labour and human trafficking language mirroring that found in the Employee Code of Conduct. In this way, each of ERAC's suppliers is affirmatively advised of our position and expectation that our suppliers comply with such principles. New suppliers are provided the Supplier Code of Conduct during the on-boarding process.
- **Franchisee Code of Conduct** – Franchisees are expected to adhere to the same principles and hold to the same business values as Enterprise Holdings. The [Franchisee Code of Conduct](#) contains anti-forced labour and human trafficking language similar to that found in the Employee and Supplier Codes of Conduct.

### **Risk Assessment and Investigation**

Potential forced labour and human trafficking supplier-network risk was identified by Enterprise Holdings in the following areas: extraction of metal used in vehicles purchased from original-equipment manufacturers and equipment purchased from after-market suppliers; extraction of rubber used in vehicle tyres; extraction of metal and minerals used in electronic equipment, and assembly of same; manufacture of employee uniforms, use of independent contractors for car washing and logistics; and the harvesting of coffee provided to employees and customers. *Actual* risk in these areas is assessed as set forth below:

- **Supplier Policy and Practices Review**
  - **Original equipment manufacturers and after-market equipment suppliers**
    - Review conducted of published human rights and working conditions statements for all original equipment manufacturer suppliers to Enterprise Holdings. All were found to have strong anti-forced labour

and human trafficking positions, as well as detailed assessment, avoidance and mitigation plans, addressing both the sourcing of raw materials and assembly of products.

- Review conducted on published human rights and working conditions statements for after-market equipment suppliers. As many were smaller in size, few maintained websites or published statements. Suppliers with material sales to Enterprise Holdings were identified for follow-up inquiry. Inquiry responses indicated that suppliers do not have forced labour and human trafficking issues within their businesses and have controls in place to mitigate risks in their supply chains. A small number of suppliers acknowledged a need to implement additional controls to mitigate supply chain risk. Periodic inquiry will continue with these suppliers to mitigate supply chain risk.
- **Vehicle tyre manufacturers**
  - Review conducted of published human rights and working conditions policies and statements for all major vehicle tyre manufacturers. The vast majority were found to have strong anti-forced labour and human trafficking positions, as well as detailed assessment, avoidance and mitigation plans, addressing the sourcing of rubber. For those without statements, but with sales to original equipment manufacturers only, the statements of the original equipment manufacturers were viewed as “covering” the supplier. Remaining manufacturers without statements were determined not to have sales to Enterprise Holdings.
- **Electronic equipment manufacturers**
  - Review conducted of published human rights and working conditions statements for all major electronic equipment manufacturers, as well as the statements of specific Enterprise Holdings’ suppliers. The vast majority were found to have strong anti-forced labour and human trafficking positions, as well as detailed assessment, avoidance and mitigation plans, addressing both the sourcing of raw materials and assembly of products. In recognition of the known risk of the use of forced labour in the extraction of minerals (“3T & G” – tungsten, tantalum, tin and gold) used in electronic equipment, suppliers without published statements were identified for follow-up inquiry. Inquiry responses indicated that suppliers do not have forced labour and human trafficking issues within their businesses and have controls in place to mitigate risks in their supply chains.
- **Employee uniform manufacturers**
  - Review conducted of published human rights and working conditions statements, where available, for all suppliers of uniforms to Enterprise Holdings. Most suppliers were found to have strong anti-forced labour and human trafficking positions, as well as detailed assessment, avoidance and mitigation plans, addressing the assembly of products. Suppliers without published statements were identified for follow-up inquiry. Inquiry responses indicated that suppliers do not have forced labour and human trafficking issues within their businesses and have controls in place to mitigate risks in their supply chains.
- **Car washing and logistics contractors**

- Review conducted of Enterprise Holdings’ contracts with car washing and logistics staffing services, and presence of terms requiring compliance with federal and state employment and immigration law verified. Suppliers without published statements were identified for follow-up inquiry. Inquiry responses indicated that suppliers do not have forced labour and human trafficking issues within their businesses and have controls in place to mitigate risks in their supply chains.
  - **Coffee distributors**
    - Coffee supplied at Corporate Headquarters in the United States and Europe is either Fairtrade or Rainforest Alliance Certified. Review conducted of published human rights and working conditions statements for other material coffee suppliers. Most suppliers’ websites did not publish human rights and working conditions statements. In recognition of the known risk of the use of forced labour in the harvesting of coffee, suppliers were identified for follow-up inquiry. Inquiry responses indicated that suppliers do not have forced labour and human trafficking issues within their businesses and have controls in place to mitigate risks in their supply chains.
- **Supplier Questionnaires** – As noted above, where evidence of anti-forced labour and human trafficking policies and practices could not be established through review of published materials, suppliers were sent questionnaires inquiring about their practices and their responses, thereafter, assessed for follow-up action.

### **Assurance**

- **Supplier Interview and Follow-Up** – Responses to supplier inquiries has been assessed for risk and follow-up investigation as appropriate.
- **Contracts and Agreements** – ERAC has developed standard contract language regarding the prohibition of forced labour and human trafficking and is including it in its contracts with suppliers of goods and services based on risk. Such language has also been made an element of new franchise agreements.
- **Reporting Mechanism** – ERAC utilises a third party-administered hotline to allow for anonymous reporting of ethics and compliance concerns. The hotline web portal allows reporting not only from employees, but from customers, suppliers, and business partners as well. To afford greater visibility to the forced labour and human trafficking issue, a standalone “Forced Labour and Human Trafficking” category is included in the list of matters for which reports can be submitted. The availability of the hotline is made known to our suppliers by way of reference in the Supplier Code of Conduct. It is also made known to franchisees by similar reference in the Franchisee Code of Conduct.

### **Training**

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As noted above, ERAC issues annual Code of Conduct training to employees. This comprehensive course presents and tests knowledge of the company’s anti-forced labour and human trafficking policy and practices.

## Conclusion

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ERAC continues to fully support the principles underlying the United Kingdom Modern Slavery Act and remains committed to the operation of a business—both directly and through our supplier network—free from the presence of forced labour and human trafficking. To date we have found no direct evidence of forced labour and human trafficking activity or risk in our business or supplier network. Going forward, leveraging the progress made over the past several years, we will continue to drive awareness of our anti-forced labour and human trafficking position with employees, suppliers, business partners, franchisees, and customers; examine our business and supplier network for risk; and aggressively respond to and address risk or evidence of forced labour or human trafficking.

Adopted on behalf of Enterprise Rent-A-Car European Holdings Limited on 31/07/2022.



Rick Short  
Director

Adopted on behalf of Enterprise Rent-A-Car UK Limited on 31/07/2022.



Rick Short  
Director

Adopted on behalf of ERAC UK Finance Limited on 31/07/2022.



Rick Short  
Director

Adopted on behalf of S.H.B. Hire Limited on 31/07/2022.



Rick Short  
Director

Adopted on behalf of Entegral Holdings Limited on 31/07/2022.

A handwritten signature in black ink, appearing to read "Rick Short". The signature is written in a cursive, somewhat stylized font.

Rick Short  
Director