

# Modern Slavery Statement for the financial year ending 31 December 2019

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 "Transparency in Supply Chains". It sets out the steps that Hertz Europe Limited, and its subsidiary Hertz UK Limited (referred to here as "we"), have taken to address the risk of slavery and human trafficking taking place in their operations and supply chains.

### INTRODUCTION

The Hertz Group has a long tradition of success in the rental car industry. We are passionate competitors, and are always in search of new means for growing our business and returning value to our stakeholders. That passion and competitive drive have been major factors in our success despite intense pressures in the industries we serve. In responding to these pressures however, we are committed to acting ethically at all times. Every member of the Hertz group is expected to conduct their business with integrity and maintain the set of standards detailed in the Hertz Standard of Business Conduct. Hertz recognises that a vital component of being a good corporate citizen is to treat everyone in our supply chain with the dignity and respect they deserve.

# **PRINCIPLES**

We do not tolerate any form of modern slavery and human trafficking in any area of our business or supply chain.

We expect the same zero tolerance approach to any form of modern slavery from our business partners. In the event that any of our business partners are found to be engaging in slavery or other unethical working practices, we will take steps to address those issues with them, seek to drive improved standards and, if necessary, terminate the business relationship.

We are committed to tackling instances of modern slavery through effective risk assessment and due diligence, training our suppliers and our work force to identify instances of modern slavery and collaborating with them and other stakeholders to achieve best practice.

# **OUR ORGANISATION**

## Organisational structure

Hertz Europe Limited and Hertz UK Limited are a part of The Hertz Corporation, and our ultimate parent company is Hertz Global Holdings Inc which has its head office in Estero, Florida, USA.

The Hertz Corporation employs approximately 38,000 employees worldwide, consisting of 29,000 employees in the U.S. and 9,000 in its international operations.

Internationally, we do business in approximately 150 countries through company-operated rental locations as well as through our partners or franchisees to whom we have licensed use of our brands.

# **Business sector**

 We are a provider of vehicles for hire. We offer multiple brands in order to provide customers a full range of rental services at different price points, levels of service, offerings and products. The vehicle rental business is operated through the Hertz, Dollar, Thrifty and Firefly brands.

- We offer a car and van-sharing membership service, referred to as Hertz 24/7, which
  rents vehicles by the hour and/or by the day, primarily in Europe.
- We sell used rental vehicles through Hertz Car Sales and Rent2Buy.
- We also dispose of vehicles through non-retail disposition channels such as auctions, brokered sales, sales to wholesalers and sales to dealers.

#### **Business units**

Our business is organised into a number business units ranging from operations, through to specialist "centres of excellence" such as Sales, Fleet and Procurement.

## **OUR SUPPLY CHAINS**

Our supply chains include vehicle manufacturers, suppliers of non-fleet goods and services, airport operators, outsourcers, contractors etc. We also have a network of franchisees and agencies providing vehicle rental services under our Hertz, Dollar, Thrifty and Firefly brands.

We rely on all of these suppliers to provide a seamless structure for our business. Although we use our own employees to provide the vast majority of our services, we also use the services of contractors to provide certain services such as for the cleaning and preparation of our vehicles for hire.

### POLICIES AND PROCEDURES

#### **Code of Conduct**

We maintain a Standards of Business Conduct (referred to here as "Code of Conduct") which is applicable to all personnel working for and on behalf of Hertz globally. It obliges all employees to act ethically and in accordance with the law, including the Modern Slavery Act 2015 and all applicable labour laws. In particular, it states that:

- We have a responsibility to uphold human rights and stand firmly against human trafficking and forced or coerced labour.
- We follow all child labour laws and support the elimination of unlawful child labour and exploitation.
- We provide fair working conditions, wages, and benefits that meet or exceed applicable laws and local requirements, as well as a safe and healthy workplace for everyone we work with.

We require all employees to certify adherence to the highest standards of ethical business practices. The Code of Conduct had to be acknowledged by all employees globally in 2017 and then, by all new hires when joining the company.

Our Code of Conduct is publicly available on Hertz Corporation's website, and is accessible by our suppliers, business partners and customers. It can be found at the following link: <a href="http://ir.hertz.com/governance-documents">http://ir.hertz.com/governance-documents</a>.

### Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and supply chains.

Our Anti-Modern Slavery Policy reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to

ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

We also maintain policies and procedures to encourage employees to report concerns and seek guidance, using confidential and anonymous methods. If employees identify any potential signs of slavery, human trafficking or other human rights abuses, they have several channels available to report this, including the Compliance, Legal and HR Departments as well as the Compliance Hotline which is a third-party service. So far, we did not receive any report of suspected modern slavery or human trafficking within our business.

Finally, we maintain policies and procedures to protect employees from retaliation if they make a good faith report.

# **Training**

The Code of conduct E-learning reiterates our commitment in uploading fair working conditions and reminds employees' responsibility to be alert for any sign of forced or coerced labour. The E-learning had to be completed by all employees globally in 2017, and then, by all supervisor level employees and above each year. The latest version has been rolled out globally in December 2017, and again in December 2018.

# CONTROLS AND MEASURES FOR OUR SUPPLY CHAIN

We comply with all local laws and regulations and require the same legal and ethical standards from our business partners, including suppliers, agents, contractors and franchisees. This helps ensure our continued success, excellence and integrity. We aim to follow best practices to ensure that suppliers and contractors act in accordance with the law. Measures include the following:

# **Contractual obligations**

We provide strong anti-slavery obligations in our contracts with our business partners and include that they must comply with all laws. We include that failure to comply will result in termination.

# Due diligence processes

We perform initial and ongoing vetting of our suppliers and franchisees to establish their compliance with applicable modern slavery legislation and their commitment and efficiency to tackle these issues. So far, we have found no evidence of forced labour or human trafficking activity within our supplier network.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we encourage our suppliers, contractors and franchisees to provide training to their employees. We will emphasise these requirements particularly in "high risk" countries to increase their awareness of these requirements related to forced labour, child labour and human trafficking.

# **NEXT STEPS**

Our approach, Code of Conduct and Policies are clear on the need to protect human rights. Over the coming years, we will continue to determine how we can obtain further comfort over the effectiveness of existing anti-slavery and human trafficking measures.

We will also continue to develop our programme, and we have already identified the following measures:

- Adoption of a Supplier Code of Conduct and a Franchisee Code of Conduct
- Adoption of a Global Human Rights Policy
- Deep assessment to identify and mitigate risks of slavery and human trafficking within our operations and supply chains.
- Identify Key Performance Indicators (KPIs) to measure the effectiveness of our programme.
- Identify and deliver specific training to employees in roles most likely to be in a position to identify and address potential modern slavery risks, including our Human Resources and Procurement functions.

Approved by the Board of Directors on 19 March 2019.

Tracy Gehlan

Senior Vice-President Europe (Interim)

Director of Hertz Europe Limited and Hertz UK Limited