



## Modern Slavery Statement for the financial year ending 31 December 2024

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 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

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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 and the significant impact of geopolitical crises after the Covid-19 pandemic.

In responding to these pressures, we are committed to acting ethically at all times. Every member of the Hertz Group is expected to behave with integrity and maintain the set of standards detailed in the company’s 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

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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. If 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 third-party due diligence. We are also committed to raise our employees’ awareness in order to identify instances of modern slavery and collaborating with them and other stakeholders to achieve best practice.

### OUR ORGANISATION

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#### 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.

As of December 31, 2024, The Hertz Corporation employed approximately 26,000 employees worldwide, consisting of approximately 19,500 employees in the U.S. and approximately 6,500 employees in its international operations.

Internationally, we do business in approximately 160 countries through company-operated rental locations as well as through our partners or franchisees to whom we have licensed use of our brands. This represents approximately 11,200 corporate and franchisee locations, comprised of 3,500 airport and 7,700 off airport locations.

## **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 primarily operated through three brands — Hertz, Dollar and Thrifty. In certain locations outside the U.S., we also offer our Firefly brand which is dedicated to cost-conscious leisure travellers.
- We have partnered with certain ride sharing companies to offer vehicle rentals to their drivers in select cities in North America and in Europe. This program enables us to rent vehicles on a longer-term basis than traditional business rentals and is a component of our strategy to be an active participant in the future of mobility. As part of an exclusive partnership with Uber and other ride-hailing platforms, we make EVs available for their drivers to rent on their network.
- 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 retail channels — Hertz Car Sales, Rent2Buy and Carvana.
- 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 of business units ranging from operations, through to specialist “centres of excellence” such as Sales, Fleet, Procurement and Facilities.

## **OUR SUPPLY CHAINS**

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Our supply chains include vehicle manufacturers, suppliers of non-fleet goods and services (including valet services, fuel, delivery and collection, insurance etc.), 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 partners 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**

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### **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 is regularly updated and acknowledged by all employees globally, and 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:

<https://ir.hertz.com/esg-1/sustainability-and-impact/default.aspx>

### **Global Human Rights Policy Statement**

We launched our Global Human Rights Policy Statement globally on December 10, 2020, to celebrate Human Rights Day. The Policy applies to all Hertz operations globally and to all Hertz employees at all levels, officers and directors.

The Policy outlines our commitment to respecting and defending Human Rights. It means that Hertz will:

- Comply with applicable national laws and international instruments setting out Human Rights standards;
- Prevent, detect and investigate possible violations of Human Rights within our business; and
- Remediate and, if necessary, punish any breach of this Policy.

With regards to third parties, our commitment also means that Hertz:

- Expect the third parties we work with to follow similar standards towards Human Rights
- Will not support or deal with any business knowingly and intentionally involved in Human Rights violations;
- Will investigate any potential violation of Human Rights within our supply chain;
- Based on the results of the investigation, may take remediation measures or, if necessary, impose adverse consequences and may also report the incident to the appropriate authorities.

Our Global Human Right Policy Statement is publicly available on Hertz Corporation's website and is accessible by our employees, suppliers, business partners and customers. It can be found at the following link:

<https://ir.hertz.com/esg-1/sustainability-and-impact/default.aspx>

### **Anti-Modern Slavery Policy**

We adopted an Anti-Modern Slavery Policy (referred to as "Policy") which is applicable to all employees in the UK and Australia at all levels, officers and directors, as well as contractors, agency workers and temporary staff. This policy can be read in conjunction with our Global Human Rights Policy Statement.

The Policy reflects our commitment to promote and uphold human rights and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

### **Global Supplier Code of Conduct**

We adopted a Global Supplier Code of Conduct which applies to all of Hertz's suppliers, business partners, consultants, contractors, subcontractors and their affiliates and applies to all products and services that Hertz purchases. It outlines our expectations, standards and guidelines for how we can mutually benefit from a commitment to ethics and integrity. With regards to fair working conditions and human rights, the Code states that:

- Suppliers are required to follow all applicable laws and regulations regarding wages,

hours, overtime, worker's compensation, and other mandated benefits.

- Suppliers have a responsibility to uphold human rights and stand firmly against human trafficking and forced or coerced labour.
- Suppliers should abide by all child labour laws and support the elimination of unlawful child labour and exploitation.
- Hertz expects its suppliers to develop and implement policies and procedures to ensure respect of all human rights in their businesses and supply chain.

Our Global Supplier Code of Conduct is publicly available on Hertz Corporation's website and is accessible by our suppliers. It can be found at the following link:

<https://ir.hertz.com/esg-1/sustainability-and-impact/default.aspx>

### **Global Brand Partner Code of Conduct**

Our Brand Partners – including our franchisees, sub-franchisees, licences, sub-licenses and agents – are expected to adhere to the same principles as Hertz and to enforce them within their own businesses. When it comes to fair working conditions and human rights, the Global Brand Partner Code of Conduct contains the same language as the Global Supplier Code of Conduct described above.

### **Other policies and procedures**

We 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 have not received 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 upholding fair working conditions and reminds employees' responsibility to be alert for any sign of forced or coerced labour.

We have created a 'Modern Slavery & Human Rights' online training for employees based in the UK and Australia, as well as for the European leaders irrespective of their locations. The training enables the employees to understand modern slavery and its various forms, to identify the red flags, to understand Hertz's obligations and to know what to do in case of suspicious of modern slavery in our supply chain. We have the intention of expanding the assignment of this training to other countries in the next years.

### **Human Rights Impact Assessment**

We are engaging efforts to identify, manage and mitigate potential and/or existing risks of slavery and human trafficking within our operations and supply chains.

In 2024, we released our 2023 Sustainability Impact Report which outlines Hertz unwavering commitment to protecting the rights of people and communities (<https://ir.hertz.com/esg-1/sustainability-and-impact/default.aspx>).

## CONTROLS AND MEASURES FOR OUR SUPPLY CHAIN

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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 anti-slavery and human rights obligations in our contracts with our business partners, which include the obligation to comply with all laws. In 2024, we substantively revisited and strengthened contractual representations and warranties required from our business partners notably suppliers and franchisees, including in relation to human rights and modern slavery.

### **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. In 2024, we laid the ground of a new policy and procedure regarding the third party due diligence, better integrating into our third party onboarding and monitoring processes the human rights checks, including forced labour aspects.

### **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. In 2024, we expanded our network of Compliance Ambassadors, increasing their number from 26 to 59 worldwide, out of which 6 are based in the UK. The Compliance Ambassadors have been trained to relay the Compliance efforts on the ground and strengthen the employees’ education on reporting of potential human rights violations, including human trafficking and coerced labour, in our business operations.

### **Investigations**

We have a well-established global reporting of compliance incidents. When identified, those incidents, which include any suspected instances of modern slavery, are thoroughly investigated, sanctioned when appropriate and relevant follow-up actions are taken. If those incidents involve a business partner, we expect a full cooperation (e.g. access to relevant information, adoption of remedial actions when appropriate etc.). In 2024, we streamlined our investigation procedure by implementing an Investigation Protocol which clarifies the stakeholders roles and responsibilities and investigation key principles applying for all internal investigations, including human rights and modern slavery related allegations.

## NEXT STEPS

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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 confirmation 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:

- Review and update as relevant the Human Rights Impact Assessment as part of our Human Rights pillar of the Ethics and Compliance Program and continuous efforts through our bi-annual Corporate and Social responsibility risk materiality assessments.
- Identify Key Performance Indicators (KPIs) to measure the effectiveness of our program.
- Review and update the Human Rights and Modern Slavery Policies to expand it to all Hertz worldwide entities.
- Survey a selection of key supply chain partners to understand their approach to eliminated modern slavery.

Approved by the Board of Directors on

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3/17/2025

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