



Introduction

It continues to be a priority for London EV Company Limited (LEVC) to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and our supply chain. This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain.

This is our annual statement which covers the period 1 April 2025 to 31 March 2026.

The statement has the following sections:

1. Organisation Structure & Supply Chains
2. Policies
3. Risk Assessment, Prevention & Mitigation
4. Due Diligence Processes
5. Training & Awareness
6. Effectiveness
7. Looking Forward

Throughout the statement, 'we' and 'our' refers to LEVC.

1. Organisational Structure & Supply Chains

Corporate Structure

LEVC is a privately owned UK company with its registered office at Ansty Park, Ansty, Coventry. LEVC sits within the Geely Group corporate family. While aligned with the Group's overarching strategy for zero-omission mobility, LEVC remains operationally autonomous in its UK activities and compliance responsibilities, including adherence to the Modern Slavery Act 2015.

During 2025 LEVC underwent a significant business restructure, which included a strategic realignment of its operations in the UK. As part of this restructure, the business has shifted its focus towards service delivery, and support operations. As a direct result of the restructure, the onboarding of new suppliers has significantly reduced, with LEVC operating a consolidated supplier base. This allows for enhanced oversight, closer supplier relationships, and improved monitoring of responsible-sourcing practices.

Relationship with the Geely Group

As part of the Geely Group, LEVC benefits from group-wide governance standards, procurement principles and human-rights expectations.



Group-level Environmental, Sustainability and Governance (ESG) frameworks help inform LEVC's policies on supply-chain due diligence, ethical sourcing and modern slavery risk management.

Despite shared governance structures, LEVC remains fully responsible for its own UK supply-chain oversight, including ensuring its suppliers comply with applicable laws and ethical standards.

Supply Chain Structure

Our purpose is the design, production and supply of modern electric vehicles and we work with our supply chain to achieve this. Our supply chain is managed by our procurement professionals and our electrical component parts suppliers are managed by our specialist supply chain management partner.

The Procurement team is responsible for:

- Supplier onboarding and pre-screening
- Modern-slavery due diligence
- Compliance monitoring
- ensuring that our suppliers are contractually committed to observing the same high standards we have established for LEVC.

Our supply chain due diligence framework includes the use of a specialist third-party provider that is responsible for managing our electrical component parts suppliers. The provider applies due diligence checks intended to identify and address modern slavery risks within the supplier base.

We recognise that effective modern slavery due diligence requires ongoing scrutiny and transparency. While due diligence processes are in place, we are currently enhancing our understanding of how supplier risk is assessed, particularly in relation to higher-risk suppliers, and how mitigation actions are applied.

Over the coming year, we will focus on strengthening our assurance over third-party due diligence arrangements, including clearer articulation of risk assessment methodologies and improved oversight of risk escalation and remediation processes. This forms part of our broader commitment to continuously improving our approach to identifying, preventing and mitigating modern slavery risks.

LEVC workforce

LEVC employs a skilled workforce primarily based at our Ansty headquarters and production facility, supported by our dealership at Brewery Road, London.



The workforce comprises permanent employees, technical specialists, approved contractors, agency workers, and international assignees, all covered by established policies on recruitment, labour rights, and ethical working practices.

Governance and responsibility for Modern Slavery Compliance

Due to the changes to the structure of LEVC in 2025, the governance framework around Compliance and Ethics was reviewed and revised for 2026. The Compliance and Ethics Committee was replaced with a Compliance, Ethics and Risk Steering Group that reports into the Senior Leadership Team quarterly, with bi-annual reporting to the Board.

The Steering Group is an operational group which provides oversight and coordination of compliance activities across the business ensuring regulatory obligations are met, and risks actively managed, this includes the risk of modern slavery and forced labour.

The SLT has day-to-day management of risk and is responsible for the design implementation and maintenance of an effective risk management system including the development of policies and procedures.

Responsibility for our 'Anti-Slavery and Human Trafficking Policy' and management of the programme and its effectiveness remains with our Legal Director, who is the Company Secretary and who reports directly to our Chief Executive Officer.

2. Policies and other controls

We continue to have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. As part of our annual review of our approach to modern slavery, we have completed a full review of our Anti-Slavery and Human Trafficking Policy. The policy remains fit for purpose with no amendments necessary.

During 2025, a significant amount of work has been undertaken by LEVC on a Due Diligence Policy that will aid Procurement in their assessment of all regulatory and compliance risks including modern slavery and forced labour. This Policy is in the process of being approved and will be rolled out during 2026.

We continue to regularly review our policies to make sure they are up to date and effective.

Staff continue to be able to access our policies on our intranet site.



3. Risk Assessment, Prevention & Mitigation

This year we've continued to focus our efforts on reducing the potential for modern slavery within higher risk procurement categories.

A review of higher risk procurement categories takes place each year to ensure that they remain the same. This review is informed by the Global Slavery Index published by the charity Walk Free.

The higher risk procurement categories for 2025 remain as:

- **Temporary Labour** – temporary labour working under our direction.
- **Facilities (Soft Services)** – office services including waste management, cleaning, and catering.
- **Electronic components** (including powertrain) from higher risk countries of origin; and
- **Garments** from higher risk countries of origin, in particular PPE.

During the reporting period, beginning in early 2026, we commenced a pilot of a supplier-level modern slavery and human trafficking risk assessment matrix for facilities management suppliers. This pilot is ongoing and will continue throughout the remainder of the reporting period.

The purpose of this pilot is to move beyond reliance on higher-risk procurement categories alone and instead assess modern slavery and human trafficking risk on an individual supplier basis. The assessment considers a range of relevant risk factors to support the identification of suppliers that may present an elevated risk.

We expect this approach to support more meaningful and targeted monitoring by enabling enhanced focus on suppliers where the potential risk is greatest. Subject to the outcome of the pilot and lessons learned, we intend to consider extending a similar supplier-level risk assessment approach to other higher-risk procurement categories in 2026/2027.

4. Due Diligence Processes

New contracts

As part of our approach to identifying and mitigating modern slavery and human trafficking risks, due diligence checks are carried out on new suppliers at the



onboarding stage. As previously reported, this includes the use of a third-party screening tool designed to identify indicators of modern slavery and human trafficking risk based on a range of factors, including geographic location, sector and supplier profile.

The screening tool continues to provide ongoing monitoring of supplier risk status and generates alerts where a supplier's risk profile changes, enabling further review where appropriate. This process supports our risk-based approach to supply chain due diligence and helps to identify suppliers that may require enhanced consideration.

Our approach to supplier screening and monitoring during the reporting period is consistent with the process applied in the previous financial year. We continue to keep our due diligence arrangements under review as part of our commitment to continuous improvement in addressing modern slavery and human trafficking risks.

Existing contracts

The annual review of the higher risk suppliers is underway at the time of writing this statement. The basis of the review is the modern slavery and human trafficking questionnaire that was completed in 2024 with suppliers being asked to provide information on any material changes to their risk profile, their supply chain, workforce and the way in which they source their subcontractors and labour. In addition, they are being asked to confirm if they have been subject to any investigation, incidents, or allegations regarding forced labour. The supplier responses will be audited to identify any non-compliance or concerns.

5. Training & Awareness

To ensure a high level of understanding of the risk of modern slavery and human trafficking in our supply chains and our business, modern slavery and human trafficking training was completed by all new starters in 2025, including those who interface with higher risk commodities and suppliers. All staff also completed the refresher training which is part of an annual cycle of mandatory compliance annual training. The refresher training modules were reviewed in 2025 to ensure that the contents were relevant and meaningful.

Prior to the completion of the training in 2025, a review of the training module on modern slavery and human trafficking and the audience was undertaken based on feedback provided by the business to ensure that the module was fit for purpose and the audience correct.

6. Procurement contracts



A review has been undertaken of our standard terms and conditions for the purchase of goods and services. We have amended the terms to enhance the supplier obligations within the terms and to enhance our rights should any of our suppliers be in breach.

7. Effectiveness

We recognise that assessing the effectiveness of actions taken to address modern slavery and human trafficking is an important part of a meaningful and proportionate due diligence framework.

During the reporting period, the effectiveness of our approach has been monitored through a combination of supplier onboarding due diligence, ongoing supplier screening alerts, policy and training reviews, and the pilot of a supplier-level risk assessment matrix for facilities management suppliers. These measures are intended to support the identification of higher-risk suppliers and inform where enhanced focus or further review may be required.

We remain committed to continuous improvement and will continue to review the effectiveness of our approach as our processes mature.

Should there be any concerns relating to modern slavery taking place on LEVC premises or within our supply chain personnel are encouraged to report it to their manager or report it in accordance with our Whistleblowing Policy.

We haven't found any evidence of modern slavery taking place on our sites within the last year; nor are we aware of any reports that it is occurring within our supply chain.

Until the end of 2026, the Compliance & Ethics Committee reviewed the effectiveness of the Anti-Slavery and Human Trafficking Policy and strategy annually. For 2026, this will be done under the oversight of the SLT and the Compliance, Ethics and Risk Steering Group.

8. Looking Forward

We recognise that expectations around modern slavery governance, due diligence and reporting continue to develop, with potential legislative and regulatory changes anticipated in the UK and other jurisdictions. We actively monitor these developments and consider how they may influence our approach to supply chain risk management and transparency.



Where appropriate, we will seek to adapt our policies, due diligence processes and reporting to reflect evolving legal requirements and recognised standards, while maintaining a proportionate, risk-based approach. This ongoing review supports our commitment to strengthening our response to modern slavery and human trafficking risks over time.

As part of our priorities for 2026, LEVC will strengthen its partnership with its third-party supply chain management provider. With the onboarding of new suppliers significantly reduced following last year's restructure, our focus in 2026 will be on deepening engagement with this provider to ensure that modern-slavery due-diligence, supplier monitoring, and risk management processes remain robust and fully aligned with our standards.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the year ending March 2026.

C. Digby

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Charlotte Digby, Legal Director
For and on behalf of the Board

**This statement was approved by the Board of London EV
Company on 29 June 2026**