



Motability Operations Group PLC

Disclosure Report
Date Submitted: July 20th, 2025



Disclosure Materials

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- 1) Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company



Disclosure Questionnaire

Industries and Products

	Yes	No
Please indicate if the company is involved in production of or trade in any of the following. Select Yes for all options that apply.		
Animal Products or Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biodiversity Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chemicals	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Firearms Weapons	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Mining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Pornography	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Tobacco	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy and Emissions Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gambling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Genetically Modified Organisms	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Illegal Products or Subject to Phase Out	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Industries at Risk of Human Rights Violations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Monoculture Agriculture	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nuclear Power or Hazardous Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payday, Short Term, or High Interest Lending	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Advisory Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Outcomes & Penalties

	Yes	No
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Breaches of Confidential Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bribery, Fraud, or Corruption	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company has filed for bankruptcy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Reporting, Taxes, Investments, or Loans	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Labor Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Large Scale Land Conversion, Acquisition, or Relocation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Litigation or Arbitration	<input type="checkbox"/>	<input checked="" type="checkbox"/>
On-Site Fatality	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Penalties Assessed For Environmental Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Political Contributions or International Affairs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recalls	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Significant Layoffs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Violation of Indigenous Peoples Rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Practices

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company prohibits freedom of association/collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company workers are prisoners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Conduct Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Confirmation of Right to Work	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does not transparently report corporate financials to government	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employs Individuals on Zero-Hour Contracts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Facilities located in sensitive ecosystems	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ID Cards Withheld or Penalties for Resignation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No formal Registration Under Domestic Regulations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No signed employment contracts for all workers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Overtime For Hourly Workers Is Compulsory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payslips not provided to show wage calculation and deductions	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Sale of Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Reduction Through Corporate Shells	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Workers cannot leave site during non-working hours	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers not Provided Clean Drinking Water or Toilets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers paid below minimum wage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers Under Bond	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child or Forced Labor	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Environmental Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Social Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Tax Reduction Through Corporate Structure

Topic	Legal Entity incorporated in the Isle of Man
Summary of Issue	<p>Motability Operations plc (MO) is a company with operations and employees hired in one of the group's two UK entities. The company's UK operation offers vehicle leasing to customers with disabilities.</p> <p>Motability Operations Group also has a subsidiary entity, Motability Reinsurance Limited (MORL), in the Isle of Man offering insurance and financial services. Isle of Man has a haven score of 100 (see link below).</p> <p>The company outlines the operations of MORL in its annual report (page 115), discloses their operations in their public tax strategy (see link below) and pays all taxes corresponding to profits in the Isle of Man through their UK parent company.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In the last fiscal year the net profit from these operations is <1% of overall revenue.
Impact on Stakeholder(s)	In addition to the many different aspects of value that business provides society, business has an obligation to contribute its share of taxes. This is because business exists within the context of society; its proper role is to serve society, not the other way around. Moreover, healthy businesses can only exist over the long term in a healthy society. A healthy society depends upon public expenditures made possible by taxes.
Implemented Management Practices	<p>According to the company's public tax strategy:</p> <ul style="list-style-type: none">- Arrangements have been structured to ensure that any profits realised in the Isle of Man through the MORL entity are allocated to Motability Operations Group plc and charged to tax in the UK. This is achieved under the UK Controlled Foreign Company (CFC) rules. These rules, contained in sections 371AA to 371VJ of Taxation (International and Other Provisions) Act 2010, impose a charge to tax on a parent company of the profits of non-resident subsidiary companies in certain prescribed circumstances.

	- The Group has received a letter of non-statutory clearance from HMRC agreeing with this principle, confirming that all profits of MORL are chargeable to tax in the UK, and that it does not benefit from a lower level of taxation than would be incurred if the captive were based in the UK.
Report	Motability Operations Group Public Tax Strategy Corporate Tax Haven Index Motability Scheme Car dealers in Isle of Man Motability Operations Group Annual Report 2024



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other

Issue Date	2025
Topic	Negative news involving the misuse of UK Motability Operations leasing scheme by customers.
Summary of Issue	<p>Motability Operations Group Plc (MO) is the commercial entity which operationalises the Motability Scheme. MO operates the Scheme under a contractual agreement with the Motability Foundation, a registered charity in the UK. The Scheme allows individuals to use their government-granted higher-rate mobility allowance to lease a car, wheelchair-accessible vehicle (WAV), scooter or powered wheelchair. MO and the Motability Foundation are legally and constitutionally independent of one another and operate autonomously.</p> <p>During 2025, the company has had multiple articles with claims of misuse of their car-leasing scheme by customers. Claims of misuse included: a Motability Scheme vehicle not being used for the benefit of the disabled customer, a Motability Scheme customer breaching their lease terms and conditions or, in rare cases, a disability allowance has been incorrectly issued to an individual.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>Motability Operations has 815,000 customers. The company's Chief Executive, Andrew Miller shared that the business looked at 35,899 claims of abuse of the scheme in 2024 (see Telegraph Article below) and that it removed 5,300 customers from the service -on average 15 per day- after investigations of misuse.</p> <p>According to the Daily Mail article (see link below), "several police forces said they collectively impounded more than 500 vehicles after they were involved in everything from drug dealing to illegal sex."</p>
Impact on Stakeholder(s)	The claims made could affect UK taxpayers as there are accusations of customers misusing their mobility allowance through the Mobility Operation's taxpayer-subsidised scheme.
Implemented Management Practices	If MO suspect that a Scheme vehicle is being misused, then the customer is contacted. If the issue requires further investigation, a tracker is placed on the vehicle to ensure that the vehicle is being used by, or for the benefit of, the disabled customer. If it is found that the vehicle is being misused or a customer breaches their terms and conditions they may be temporarily or

	<p>permanently suspended from the Motability Scheme. In 2024, 5000 customers were temporarily or permanently removed from the Motability Scheme due to misuse.</p> <p>A spokesman for Motability Operations said: Misuse of the scheme is unacceptable. When concerns are raised-whether by our own teams or from external sources, we investigate thoroughly and take appropriate action. As the scheme has grown, so have the number of cases. That's to be expected- and we're responding with even greater focus. We're strengthening our approach to tackling abuse, including working closely with national policing bodies to investigate allegations of fraud or malpractice."</p> <p>The company has shared with the Daily Mail that they have a scheme protection team of around 70 people to detect and address cases of misuse of the scheme (see link to Daily Mail Article below).</p>
Report	<p>Daily Mail Article: Motability scheme cars linked to crimes</p> <p>The Telegraph Article: Motability Operations action on cases of abuse of taxpayer-subsidised scheme.</p> <p>The Guardian Article: Is it true that the disability scheme is taking UK taxpayers for a ride?</p> <p>Bloomberg Article: How Auto Sales Giant Motability Cornered Britain's Car Market.</p> <p>The Times Article. Motability Operations CEO Andrew Miller on Motability Scheme misuse.</p>

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other

Issue Date	2018
Topic	Negative news related to significant surpluses of the company and allegations of overcharging consumers.
Summary of Issue	<p>In May 2018, a report by the House of Commons Work and Pensions and Treasury select committees raised questions about the structures and governance of the scheme; government support of the scheme: the levels of reserves in Motability Operations; the remuneration of its senior staff; and the relationship between Motability and the Department for Work & Pensions. Together with the Secretary of State for Work and Pensions, the Committees recommended that the National Audit Office (NAO) should carry out a review of the scheme (see link below).</p> <p>The report provided transparency on the salary and bonus of the previous Motability Operations' CEO as well as allegations of overcharging customers by GBP 390 million. The main conclusions of the report highlight the need for the company to:</p> <ul style="list-style-type: none"> - Provide greater transparency through its annual reports and accounts about the total value of performance bonuses paid to its executive directors; - Review its approach to and clearer public accountability; - Develop and publish a long term strategy, based on broad and open consultation on the use of future income from Motability Operations; - Commission external benchmarking on the level of reserves held at Motability Operations based on comparable companies in similar industries; - Carry out a review of the performance framework for the scheme. <p>More information on findings and conclusions are outlined and available online (see links below).</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The company has not had any legal claims against them in relation to executive pay or profitability of their scheme. The findings of the UK National Audit Office report, included allegations of overcharging customers by GBP 390 million.
Impact on Stakeholders	Allegations present a potential impact on shareholders and customers.

Implemented Management Practices	<p>The company shared that they implemented practices related to greater transparency of performance bonuses paid to executive directors and their approach to forecasting. They also disclose a remuneration report in their annual report (see link below- page 123).</p> <p>Motability Operations also have their remuneration policies and practices audited by an external third party. The remuneration committee is chaired by an independent non executive board of directors. The company has also set reduction targets for executive bonuses.</p>
Report	<p>Motability Operations Annual Report Press release: The Motability Scheme The National Audit Office (NAO) Report: The Motability Scheme Motability Operations Response Motability Operations Response Information on Motability Operations scheme</p>