

Modern Day Slavery – MOTUS Holdings (UK) Ltd

This scope of this policy applies to MOTUS Holdings (UK) Limited (“MOTUS”) and its Subsidiaries; Employees, Franchise & Manufacturing Partners and Suppliers of Goods & Services engaged in business with MOTUS. [MOTUS subsidiaries are: MOTUS Group (UK) Limited (Company No. 00653665), S&B Commercials Limited (Company No. 01635078) and Reeve (Derby) Limited (Company No. 04120259)].

The Statement covers Modern Day Slavery and Human Trafficking in accordance with the Modern Day Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business for the financial year ended 30 June 2018.

Modern Day Slavery and Human Trafficking can take on many forms such as; slavery, servitude, forced labour, compulsory labour and human trafficking. Such activities are an affront to human dignity, an offence in UK law and completely contrary to the values of the MOTUS.

Group overview

MOTUS is the largest independent commercial vehicle dealer group in the UK and, with its passenger vehicle interests included, ranks inside the Top 15 of all UK automotive dealer groups. Our operations encompass 115 automotive franchise outlets across 70 locations, covering passenger vehicles, trucks and vans – truck and van, 87 franchise outlets; passenger cars, 28 franchise outlets. The business additionally operates two specialist commercial vehicle body shops and has further interests in parts and service facilities and commercial vehicle equipment supply. We also have a network of 14 ATF sites, able to carry out DVSA MOT's on Commercial Vehicles.

We work with a number of franchise partners that include DAF Trucks, Mercedes Benz Trucks / Vans, VW Commercial Vehicles, ISUZU Trucks and pick-ups, IVECO, FORD Commercials, FIAT Professional, Renault Trucks, LDV, MAN Trucks, Vauxhall, Peugeot, Citroen, FIAT, NISSAN, SEAT, JEEP, Renault, Mazda, Alfa Romeo, Dacia, Mitsubishi, Abarth and KIA.

MOTUS employs almost 3,000 people across its operations, operating on mainland UK. The UK business is owned by Imperial Holdings Limited which is a JSE listed South African-based international group of companies operating in the logistics and vehicle sectors with operations mainly in Africa and Europe.

Policy and principles

MOTUS is committed to complying with its obligations under the Modern Day Slavery Act and other relevant legislation relating to the detection and prevention of modern slavery. In particular, MOTUS is committed to implementing and enforcing effective systems and controls that seek to ensure that modern slavery is not taking place anywhere in its business or in its supply chains. The Company expects that any organisation within the scope of the legislation will also apply the same high standards.

The Company has zero tolerance for breaches in the Modern Day Slavery Act and has in place policies processes, whistleblowing and auditing procedures to ensure that any organisation within the scope of the policy who transacts business with MOTUS complies with it.

The company will terminate any commercial relationships with suppliers if they are in breach of our policy and/or are found to have been involved in modern slavery.

Our recruitment processes are transparent with appointments approved by Directors. There are robust procedures in place for the vetting of new employees that enables us to confirm their identities and ensure they are both paid directly and correctly.

Any breach of our Modern Day Slavery policy by any employee will result in disciplinary action which could result in dismissal for gross misconduct.

Managing risk in our supply chain

We are committed to maintaining the highest ethical standards across our supply chain. The prevention, detection and reporting of modern slavery in any part of the Company's business is the responsibility of all those working for the Company or under the Company's control. Individual management teams are responsible for ensuring compliance with laws and regulations, including compliance with the Modern Day Slavery policy.

To achieve this, MOTUS will ensure that:-

- All colleagues are aware of the Modern Day Slavery policy by making it available to view on the Company Intranets;
- Training on this policy, and on the risk our business faces in our supply chains, forms part of the induction process for all individuals who work with us;
- Our zero –tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter; and
- Managers and their teams will be responsible for ensuring that MOTUS has on record for suppliers a signed MOTUS declaration of compliance (to our Modern Day Slavery Policy).

Actions taken in financial year ended 30 June 2018

During the financial year ended 30 June 2018, MOTUS took the following steps with the intention of ensuring that slavery and human trafficking does not take place in its business or supply chains:-

1. Human Resource Policies
Within our commercials division (Imperial Commercials, Mercedes Benz and Vehicle Solutions divisions) we reviewed our HR policies in during 2017/18 and internally published in May 2018 to reflect Modern Day Slavery requirements where required.
2. National Minimum Wage Reviews
We conduct national minimum wage reviews to verify all employees are paid in accordance with legal requirements on a regular basis.
3. Employee induction and training
Our obligations in relation to modern slavery are communicated to new employees as part of inductions provided.

Actions identified to be taken in the forthcoming financial year

The following steps have been identified to be performed in the current financial year to promote awareness of our anti-slavery and human trafficking arrangements:-

4. Group Modern Day Slavery Policy
The Group Modern Slavery Policy to be reviewed and updated (to combine Pentagon Motor Group Limited arrangements into the existing Group Policy). The policy applies to all Group companies, divisions and businesses, and their respective staff and subcontractors. The policy to be provided to business Directors / Managers (and their respective teams) to consider in their purchasing decisions and arrangements.
5. Risk assessments
A risk assessments is undertaken on a prioritised and proportionate basis to identify areas of potential risk in relation to modern slavery and human trafficking among existing suppliers. Where appropriate managers to undertake confirmation of adequacy of arrangements for those high risk supplier categories identified. The majority of our supplies are from our main franchise partners of commercial vehicles and parts.
6. Standard contractual documentation
Our purchasing standard terms and conditions for suppliers to be reviewed / updated to comply with the Modern Slavery Act. These to be finalised and introduced for use in contracts with suppliers.

Approval

This statement is made with respect to the financial year ended 30 June 2018 in accordance with section 54(1) of the Modern Slavery Act 2015. The statement will be reviewed and updated (if necessary) annually to reflect our ongoing commitment to ensuring that its business and supply chains are free from slavery and human trafficking.



Rob Truscott

Chief Executive Officer

23 October 2018