

## **MOTO GROUP ("Moto") STATEMENT ON SLAVERY AND HUMAN TRAFFICKING**

Moto has zero tolerance for slavery and human trafficking in any form and is committed to combating all such practices. We are taking steps to improve our practices and to ensure so far as possible that our suppliers share those values and put them into effect.

### **OUR BUSINESS**

Moto operates a chain of motorway and roadside service areas throughout the UK, offering retail, catering and fuel products within its amenity areas and forecourts. Details of our corporate structure appear on the "About Us" section of our web page.

### **OUR SUPPLY CHAINS**

Our supply chains include: supplies of fuel, utilities, construction and maintenance, catering supplies, and a range of other products for sale in our service areas including confectionary, tobacco, books and newspapers.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business and this is reflected in our Corporate Social Responsibility Policy. This policy sets out our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers

### **SUPPLY CHAIN COMPLIANCE/ACCOUNTABILITY**

To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- **Supplier Code of Conduct**

As part of Moto's commitment, we have adopted a Moto Supplier Code of Conduct to which we will hold our supply chain accountable. The Moto Supplier Code of Conduct prohibits the use of forced, compulsory, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery, servitude or trafficking of persons and unlawful child labour.

- **Supplier Certification, Procurement and Contracts**

- Moto require all current suppliers to certify their compliance with the Moto Supplier Code of Conduct, or in the case of large corporate suppliers and franchisors, their own equivalent standard code. As part of Moto's standard procurement procedures, Moto consider each supplier's conduct vis-à-vis the Moto Supplier Code of Conduct, when awarding and/or renewing business with the supplier. Contracts will be terminated as soon as possible in the event of a breach of the Code, or failure /refusal to certify willingness to comply. Moto will ensure that future contracts with our suppliers will require compliance with the new Moto Supplier Code of Conduct (or equivalent standard Supplier Code.)

### **MOTO ACCOUNTABILITY**

- Moto is committed to ethical and socially responsible conduct in the workplace. Moto seeks to comply with all employment legislation, including conducting appropriate right to work checks prior to employment, to ensure all employees are fully entitled to work in the U.K.

### **TRAINING AND INFORMATION**

- To ensure an understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide information and training on how to identify signs of human slavery and how to respond, as appropriate to all our employees
- The Moto Supplier Code of Conduct has been circulated to all heads of department, and all relevant employees dealing with suppliers are required to familiarise themselves with it. A copy of Moto's Corporate Social Responsibility Policy is available to all employees.
- Moto will review the Moto Supplier Code of Conduct and Moto Social Responsibility Policy each year, and any updates will be notified accordingly to all relevant employees.

#### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We will use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Records to confirm all employees have the right to work in the UK;
- Records that employees have received appropriate training;
- Records to confirm suppliers have certified compliance with Supplier Code of Conduct;

We have set up a Modern Slavery Working Group, which includes senior members of our Operating Board, with a brief to map our supply chain, identify any suppliers who may be higher risk and any further practical steps we can take to mitigate those risks, and to ensure that all necessary processes are in place to facilitate appropriate action to combat slavery. Suppliers identified as potentially higher risk by the Modern Slavery Working Group were asked to complete a more detailed audit to test compliance with the Supplier Code of Conduct.

#### **FUTURE PROGRESS**

Following a review of the effectiveness of the steps we have taken in 2018-2019, we intend to take the following further steps this year to ensure that there is no slavery or human trafficking in our supply chains:

- The Modern Slavery Working Group will continue to meet to progress, review and update the supply chain mapping process and to co-ordinate further practical actions which can be taken to mitigate risks of slavery in the supply chain.
- We will continue to make all efforts to identify any significant risks in our business and supply chain and implement any actions appropriate or necessary directly with suppliers
- We are about to commence an audit programme to review the effectiveness of the measures we have taken to recognise and eradicate modern slavery from our business and supply chain

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Moto Hospitality Limited Slavery and Human Trafficking Statement for the financial year ending 31 December 2018- 31 December 2019.

SIGNATURE: 

**Kennedy McMeikan**  
**On Behalf of all Moto Group Companies**  
**Date: 25.4 2019**

**\*Moto Group Companies include Everest UK Topco Ltd/Everest UK Bidco Limited, Moto Finance PLC Moto Holdings Limited / Moto Ventures Limited ,Moto Investments Limited and Moto Hospitality Limited. Moto Hospitality Limited is the only operating company within the group.**

## **MOTO HOSPITALITY LIMITED SUPPLIER CODE OF CONDUCT**

Moto Hospitality Limited (“Moto”) has committed to a strict set of ethical principles, to guide us in our business dealings, and we expect all our suppliers to adhere to the same ethical principles. This Supplier Code of Conduct sets out the standards and principles which we expect our suppliers to comply with.

### **1. Laws, Ethical Standards and Human Rights**

- (a) The supplier shall comply with all laws and regulations applicable to its business including those relating to human rights and employee rights at work.

### **2. Labour Standards**

- a) **Child Labour:** The supplier shall comply with all national legislation regarding the employment of children. The supplier shall not employ any children under the age of 15, save as follows. If applicable national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances where it would hinder the child from the completion of compulsory schooling or training, or if the employment would be harmful to the child’s health or development.
- b) **Forced Labour:** The supplier shall not make use of any forced or compulsory labour. The supplier shall not engage in human trafficking or exploitation, or import or use goods tainted by slavery, servitude, forced or compulsory labour or human trafficking. The supplier shall not retain employees’ government-issued identification, passports or work permits as a condition of employment.
- c) **Compensation and Working Hours:** The supplier shall comply with all respective national laws and regulations regarding working hours, wages and benefits. The supplier shall ensure that its workers are paid lawful wages, including overtime, premium pay, and equal pay for equal work without discrimination. The supplier shall not make any disciplinary deductions from pay.
- d) **Discrimination:** The supplier shall not discriminate on the basis of race, religion or belief, disability, age, sex, sexual orientation, gender reassignment, marriage, civil partnership, pregnancy, or maternity. The supplier shall treat its employees with fairness, dignity and respect. The supplier will not perform or tolerate any form of physical, sexual, psychological or verbal harassment or abuse, or victimisation or bullying, within its workforce.
- e) **Freedom of Association:** The supplier shall respect the rights of workers to associate or not to associate with any group, as permitted by and in accordance with all applicable laws and regulations.
- f) **Employment Status:** The supplier shall only employ workers who are legally authorized to work in their location and facility. The supplier shall ensure that it validates all employees’ eligibility to work status through appropriate documentation.

### **3. Health & Safety**

The supplier shall comply with all applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work-related illnesses. The supplier shall ensure that all workers receive communication and training on emergency planning and safe work practices. The supplier shall have systems to prevent, detect and respond to potential risks to the safety, health and security of all employees.

### **4. Bribery, Corruption and Improper Payments**

The supplier shall comply with all international anti-bribery and anti-corruption standards, as stated in the United Nations' Global Compact, and all local anti-corruption and anti-bribery laws, including The Bribery Act 2010 in the United Kingdom. In particular, the supplier may not offer services, gifts or benefits to Moto employees in order to influence their conduct.

**5. The Environment**

- a) The supplier shall comply with all applicable environmental laws, regulations and standards.
- b) The supplier shall take steps to implement an effective system to identify and reduce as far as possible any potential hazards to the environment.
- c) The supplier shall strive to support Moto's energy efficiency and environmental performance goals (detailed on the Moto website) through the products and services it delivers. In this regard, the supplier shall take energy efficiency and environmental protection appropriately into account in its own operations, for example, by setting its own energy efficiency and environmental goals and achieving them.

**6. The Supplier's Business Partners and Chain of Supply**

- a) So far as possible, the supplier shall take steps to ensure that any third party (including any person, business partner, agent, sub-contractor, corporate or unincorporated body) who supplies goods to, or performs services for, the supplier, in connection with the supply of any goods or services to Moto, shall also adhere to the standards and obligations set out in this Moto Supplier Code of Conduct.
- b) The supplier shall accordingly take steps to ensure so far as possible that it imposes on any such third party its own supplier code of conduct which includes obligations and standards equivalent to those imposed on the Supplier in this Moto Supplier Code of Conduct.

**7. Tax**

The Supplier shall comply with all relevant tax legislation, shall not engage in any activity, practice or conduct which would constitute unlawful tax evasion facilitation in accordance with the Criminal Finances Act 2017 and shall maintain in place such policies and procedures as are reasonable to prevent the facilitation of tax evasion by associated persons (including without limitation employees)

**8. Compliance with the Supplier Code of Conduct**

The supplier will provide all such cooperation as Moto reasonably requires in order confirming compliance with this Code of Conduct. Moto therefore encourages suppliers to implementation of their own binding ethical principles and guidelines for ethical behaviour.