

# Modern Slavery Statement

The logo for 'moto' is centered within a white circle. The word 'moto' is written in a lowercase, sans-serif font. The 'o' is a light blue color, and there is a small orange smile-like shape under the 'o'.

**moto**

## About Us

Moto\* is the UK's largest Motorway Service Area ("**MSA**") operator, serving more than 120 million visitors every year across 69 UK sites. Moto provides a wide range of services for motorists including Toilets, Shower facilities, Food and Drink, Parking, EV Charging and Fuel. Our motorway service areas are open 24 hours a day, 365 days a year and have over 350 restaurants, shops and forecourts with market-leading brands including BP, Burger King, Costa, Greggs, KFC, M&S, Pret and WH Smith. Moto is the leading provider of ultra-rapid EV charging across the UK motorway network.

Moto's purpose is to "*Brighten People's Journeys Through Life*". Our values underpin the winning culture that we are aspiring to achieve and drive every decision we make. Our values influence every aspect of what we do, for our colleagues our customers and our communities.

Moto is owned by Universities Superannuation Scheme, in partnership with CVC Capital Partners.

## Our Environmental, Social and Governance ("**ESG**") Strategy

To successfully deliver our ESG strategy, our shareholders have established an ESG Committee as a subgroup of the main Shareholder Board, who will:

- take a strategic overview of 'Positive Journeys';
- monitor progress and delivery against this strategy; and
- be responsible for an overview of ESG policy compliance and reporting with any recommendations to the Board.

Moto's Operating Board is responsible for defining the ESG strategy and relevant targets and KPIs as well as reviewing ESG-related policies, processes, and practices to ensure they remain relevant, up to date and reflect industry best practice. Our ESG governance and programme structure is cross-functional and provides opportunity for us to harness the knowledge and experience of colleagues across the business.

The ESG Committee meets bi-annually with Operating Board ESG meetings taking place quarterly to review progress on targets and evaluate any risks and opportunities. Underpinning these are the individual ESG programme working groups each chaired by an Operating Board Director, who meet monthly. The groups are responsible for the detailed environmental and social activities that form part of our day-to-day business operations.

Our Environmental, Social and Governance ("**ESG**") goals can be found at <https://moto-way.com/about-us/esg/>.

## Our Supply Chains

At Moto, we largely operate on a franchise model basis in relation to the partner brands listed above (apart from BP) and work closely with them. In addition, we also have many smaller suppliers and wholesalers supplying us with a range of goods and services ranging from utilities, IT, construction, cleaning, parking and maintenance services to the toys, books and magazines sold in our MSAs.

## Our Approach to Modern Slavery

As part of the “Social” element of our ESG Strategy (referred to above), we are committed to the values of “*Do The Right Thing*” and “*Set the Bar High*”, amongst others, and acting ethically and with integrity in all of our business relationships, including in our dealings with our supply chain.

Moto operates a zero-tolerance approach towards any form of slavery, servitude, human trafficking or forced labour (collectively termed “**Modern Slavery**”).

We work every day to create the right conditions for our colleagues and others with whom we work, to flourish and achieve their full potential.

### Policies

- Our **Supplier Code of Conduct** enables us to ensure that all our third-party suppliers adhere to our standards, including with respect to Modern Slavery;
- Our **Whistleblowing Policy** enables all colleagues to raise concerns about business practices or the supply chain, including in relation to Modern Slavery, without fear of reprisals;
- Our **Anti-Bribery and Corruption Policy** enables all colleagues to raise concerns about any suspected bribery or corruption, including that which could be linked to Modern Slavery;
- Our **ESG Policy** recognises that our colleagues are at the heart of our business and that their wellbeing is paramount;
- Our **Asylum and Immigration Policy** enables us to ensure that leaders responsible for recruiting and employing colleagues are aware of the Right to Work checks and practices to be carried out to ensure compliance with applicable laws and regulations, including with respect to Modern Slavery; and
- Our **Modern Slavery Policy** enables all colleagues to properly understand what Modern Slavery is, what our key risk areas are, and how to identify and report any instances of Modern Slavery.

### Due Diligence and Risk Assessment/Procedures

#### Suppliers

- For nominated suppliers, we refer to compliance with our Supplier Code of Conduct as a pre-requisite in our documentation at Request for Quotation stage;
- All our precedent supplier contracts contain:
  - (a) an anti-slavery clause which we endeavour to ensure flows down through all layers of our supply chain and prohibits suppliers and their employees from engaging in slavery or human trafficking; and

- (b) an audit clause which allows us to monitor the supplier's compliance with Modern Slavery laws, amongst other things;
- We endeavour to contract with all suppliers using our Moto precedent supplier contract terms but where this is not possible, we always seek to include an anti-slavery clause which prohibits suppliers and their employees from engaging in slavery or human trafficking and an audit clause which allows us to monitor the supplier's compliance with modern slavery laws, amongst other things;
- We do not tolerate slavery and human trafficking within our supply chains; and
- We have implemented a new contract and supplier management tool to enhance our visibility over our supplier base.

### **Our Colleagues**

- We complete a Right to Work check for all new hires to confirm the identity of the worker and to verify their right to work in the UK;
- Colleagues are issued with a written contract of employment that complies with all applicable employment laws including regarding wages, benefits, working hours, minimum wage levels and no unauthorised deductions;
- Our contracts of employment contain reasonable notice provisions to allow our colleagues to terminate their employment with us, should they wish to do so;
- Colleagues are paid by bank transfer to their nominated bank accounts, thus minimising the risk of Modern Slavery;
- We salary benchmark against like-for-like roles within our industry; and
- Colleagues are free to join trade unions and Moto regularly engages with USDAW when agreeing pay levels and terms of employment.

### **Wellbeing at Moto**

- We aim to create a culture of wellbeing by educating and supporting colleagues, as well as creating an environment where they feel safe and valued;
- We have a wellbeing focus group 'A Better Me' who meet regularly to discuss and implement wellbeing strategies and initiatives within Moto. They also deliver quarterly webinars on sensitive topics such as suicide awareness, baby loss awareness and eating disorders to normalise and create an open channel of discussion for our colleagues on these sensitive topics;
- We provide Wellbeing Champion Training covering financial, physical, mental, and social wellbeing to all leaders and nominated colleagues. We currently have 450 trained Wellbeing Champions within Moto and aiming to have 1000 by 2027;
- We encourage leaders to meet regularly with their teams not only to review their performance but to also build trust and support their wellbeing;
- We regularly remind colleagues of our Whistleblowing Policy which encourages colleagues to "Speak Up" if they have concerns, including in relation to Modern Slavery;
- We conduct an annual "Have Your Say" survey to gauge colleague happiness levels across the business and act, based on the feedback, to create a winning culture and great place to work; and

- We regularly review occupational health and safety risks to try and minimise work-related risks that could lead to mental or physical injury or ill-health.

## Performance Indicators

We use the following key performance indicators to measure how effective we have been to ensure that Modern Slavery is not occurring in any part of our business or supply chains:

- 100% of colleagues have records to confirm that they have the Right to Work in the UK;
- 100% of nominated suppliers have agreed to comply with our Supplier Code of Conduct (or equivalent terms); and
- Accurate records to confirm that no whistleblowing reports have been received indicating Modern Slavery practices.

Our labour and human rights policies and practices are annually assessed as part of our overall ESG strategy by an independent provider of business sustainability ratings (EcoVadis).

## Training

Our colleagues complete a range of e-learning modules as part of their onboarding when they join the business. This includes training on how to conduct Right to Work in the UK checks, training on Safety, Health and Wellbeing and Diversity and Inclusion. This training instils in our colleagues the values of diversity, equity, and inclusion, condemns harassment and discrimination, and provides guidance around a multitude of ethics and compliance issues.

## Ongoing Development

In 2024/5, we will build on this by:

- Continuing our supply-chain mapping to determine the location of suppliers and their risk profiles in terms of supplying high-risk products and/or services and implementing a process for carrying out such location and risk profile checks for all potential suppliers going forwards;
- Encouraging our larger suppliers to become members of the Supplier Ethical Data Exchange and tracking rates of membership ("**SEDEX**");
- Endeavouring to include a "Modern Slavery" and a "right to audit" clause in contracts with our suppliers to enhance risk control and mitigation;
- Delivering relevant colleague training on Modern Slavery risks as part of a wider Code of Business Conduct programme; and
- Reviewing the potential for our colleagues to receive additional guidance on spotting signs of Modern Slavery externally (as they are uniquely positioned to do this through their dealings with the public at MSAs).

Notes:

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the actions that Moto Hospitality Limited has taken during the financial

year ended 28 December 2023 to identify and prevent modern slavery risks in our business and supply chains.

This statement was approved by the Operating Board of Moto Hospitality Limited on 5 June 2024 on behalf of all Moto Group Companies.

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*Kennedy McMeikan*  
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**Kennedy McMeikan**

**CEO**