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Anti – Slavery and Human Trafficking Policy / Statement ^

Pentagon Investments Limited and group

Meadow Group Services Limited

Pentagon Vehicle Rentals Limited

Mertrux Limited

Anti - Slavery and Human Trafficking Policy / Statement




This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps the Company is taking to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Introduction from Ian Marshall, Group Managing Director

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to

the same standards.

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Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.



Ian Marshall

Group Managing Director

Organisation's Structure

Mertrux Limited is a franchised Mercedes-Benz Commercial Vehicle Dealer and retails and repairs the Mercedes Benz Van and Truck range. In addition, the group retails commercial vehicle parts and accessories as part of the Mercedes Benz UK network. Mertrux has its head office in Derby and branches in Derby, Leicester, Mansfield and Nottingham.

Our Business

The group employs approximately 190 people over 4 sites.

Our Supply Chains

Our supply chain includes the sourcing of vehicles, bodies, ancillary equipment and parts relating to the sale and repair of new commercial vehicles.

The automotive supply chain is one of the most complicated of any industry. There are often six to ten levels of suppliers between an automaker and the source of raw materials that enter the manufacturing process. The breadth, depth and interconnectedness of the automotive supply chain

make it challenging to effectively manage business and sustainability issues. Respecting human rights and environmental issues in the supply chain is ultimately our suppliers' responsibility. As customers, however, we play an active role in supplier development and have adopted various means to clearly communicate our expectations to our suppliers.



Our Policy on Human Slavery and Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of business or in our supply chains. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to prevent slavery and human trafficking 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 employ a Human Resources Team who vet all applicants thoroughly and work closely with any agencies and 3rd parties who provide us with potential labour.
- Where possible we build long standing relationships with our suppliers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We expect each entity in the chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the chain, ultimately to component manufacturers.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

We applaud the work being done to reduce forced labour and human trafficking in the UK. We are communicating to our staff our policy and awareness training will take place to complement and reinforce this. Training in this area will be provided to key personnel within the business.

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Supplier Adherence to our Values

We expect all those in our supply chain and contractors comply with our values.

The Directors and Senior Managers are responsible for compliance in their respective  their supplier relationships.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Managers/Directors have been briefed on the subject.

Our Effectiveness in Combating Slavery and Human Trafficking:

We 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:

- Use of labour monitoring and HR/Payroll systems
- Authorised Suppliers listing to be maintained and audited.
- All Managers will be briefed on issues around third party labour exploitation.
- Ensure that labour sourcing, recruitment and placement processes are under the control of trusted staff members and are not open to corruption.
- Encourage workers to report cases of hidden third party labour exploitation and investigate and act on reports appropriately.

Gary Robson

Group Human Resources Director

Approved by the Board of Directors on 21/06/2018

Group Tax Strategy

