



PENDRAGON PLC: ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement sets out the steps that Pendragon PLC and its subsidiaries (“Pendragon”) have taken to prevent modern slavery and human trafficking occurring within any part of its businesses or supply chain during the financial year ending 31 December 2018, and is made pursuant to the Modern Slavery Act 2015.

Our Structure, Business and Supply Chains

Pendragon PLC is the parent company of a group of companies which specialise in the retailing of used and new vehicles, and the service and repair of vehicles (aftersales), primarily through our 200 franchise points operating under the brands of ‘Stratstone’ for the premium vehicle segment and ‘Evans Halshaw’ for the volume vehicle segment in the UK, and our online platforms stratstone.com and evanshalshaw.com.

This statement relates to Pendragon PLC and all active companies in the group, including but not limited to Alloy Racing Equipment Limited, Bramall Quicks Dealerships Limited, Car Store Limited, Chatfields Limited Derwent Vehicles Limited, Evans Halshaw Limited, National Fleet Solutions Limited, Pendragon Management Services Limited, Pendragon Motor Group Limited, Pendragon Premier Limited, Pendragon Property Holdings Limited Pendragon Sabre Limited , Pendragon Vehicle Management Limited, Reg Vardy Limited, Stratstone Limited and Victoria (Bavaria) Limited.

Pendragon currently employs around 9,000 team members, the vast majority of whom are based at motor vehicle dealerships in the UK. Pendragon uses a wide variety of national, local and international suppliers to source goods, services and equipment for the operation of its businesses. In particular, we work principally with a variety of vehicle manufacturers from whom we obtain our principal products: motor vehicles and aftersales parts. The directors recognise the nature of our supply chain makes checking for illegal activity challenging, but there are a number of checks and safeguards we have been able to put in place that reduce the risk of slavery and human trafficking occurring in our supply chain, as explained below.

Our Anti-Slavery and Human Trafficking Policy

The Board annually reviews and approves the Pendragon Anti-Slavery and Human Trafficking Policy (the “Policy”). The Policy adopts the following anti-slavery value:-

PENDRAGON PLC ANTI-SLAVERY VALUE

As part of our culture of good governance for good business, at Pendragon PLC we operate to a set of core values which reflect our relationships with our principal stakeholder groups: customers, manufacturers, shareholders, suppliers and team members. We adopt a behavioural attitude for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

Our attitude to modern slavery is: zero tolerance.

Our full Policy is available for download at:-

<http://www.pendragonplc.com/investors/corporate-responsibility/>

The Policy sets out the steps we have taken and continue to take to prevent modern slavery and human trafficking occurring in our business or supply chain, who is responsible for the prevention of modern slavery in our business, the steps team members and suppliers are able to take to report modern slavery or human trafficking and the safeguards we have in place to ensure reporting can occur in confidence.

Our Due Diligence Processes in Relation to Slavery and Human Trafficking

In accordance with our Anti-Slavery and Human Trafficking Policy we continue to (i) conduct risk assessments with internal audit to identify which parts of our businesses are most at risk from modern slavery; (ii) engage with all our major suppliers to convey our Anti-Slavery and Human Trafficking Policy and the Pendragon PLC Anti-Slavery Value, and asked suppliers to provide confirmation that they have read and understood the Policy and will adhere to it; (iii) conduct surveys of our suppliers to establish what steps, measures and practices they have implemented to prevent modern slavery occurring in their organisations; (iv) conduct supplier pre-screening where appropriate in our contract and tender processes; and (v) include contractual provisions where appropriate in our supply contracts confirming that our suppliers adhere to and accept our Policy and the Modern Slavery Act 2015.

Responses and the reaction of our suppliers to the due diligence steps we have implemented are reviewed allowing refining and modifying of these to ensure they are appropriate in supporting adherence to, and implementation of our Policy.

Whilst the directors believe that Pendragon companies are generally at low risk of exposure to modern slavery and human trafficking, our internal risk assessments identify which of our suppliers and sub-contractors are potentially more exposed than others, and to which further diligence will be applied.

Measuring the Effectiveness of the Policy

The Pendragon PLC anti-slavery value statement makes it clear that our attitude to modern slavery is zero tolerance. To this extent, we have not adopted any performance indicators as any instance of modern slavery or human trafficking by a supplier would be considered to be a breach of the Policy.

However, through our survey of key suppliers, we record (i) how many of our suppliers have read and agreed to adhere to our Policy; (ii) how many of our suppliers have implemented their own contractual arrangements with prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude (iii) how many of our suppliers place obligations on their own employees to familiarise themselves with the supplier's own anti-slavery and human trafficking policies; (iv) how many of our suppliers conduct their own modern slavery risk assessments and (v) what steps our suppliers have taken to control and monitor the risk and contravention of the Modern Slavery Act 2015. Where a supplier has indicated to us that they are not yet in a position to provide positive affirmation, we have also asked for confirmation as to the likely timescale by which they will be able to comply.

We will re-survey and reassess our key supplies on a bi-annual basis.

Training and Awareness of our Team Members

All Pendragon team members have an obligation to familiarise themselves with our Policy and procedures to help in the identification and prevention of modern slavery. Adherence to our Policy forms part of all team members' obligations under their contract of employment. The full Policy is available on our internet site. To further raise awareness of the Policy internally, the Policy is published on our internal intranet portal, together with a short internally produced awareness film designed specifically for the retail motor industry. In addition, new team members are introduced to the Policy as part of their induction process.

STATEMENT APPROVED BY THE PENDRAGON PLC BOARD 3 DECEMBER 2018.