



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY 2018-2019

As a Group, Pendragon maintains relationships with many different organisations in its supply chain, as well as employing directly large numbers of people. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains. The policy below underpins our approach, and should be considered in conjunction with our Statement on Slavery and Human Trafficking, republished annually.

Pendragon has adopted a statement of our corporate value on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with Pendragon and/or any member of our Group, to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our 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 value 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.**

1. PURPOSE OF THIS POLICY

1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Pendragon PLC (the “Company”) with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

1.2 As a Group, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

1.3 For the purposes of this Policy, “Group” means any currently active subsidiary company of Pendragon PLC, which at the date of publication includes 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 and the Policy shall specifically apply to these Group companies accordingly.

2. STEPS FOR THE PREVENTION OF MODERN SLAVERY

2.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

2.2 All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.

2.3 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:

- (i) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- (ii) engage with our suppliers both to convey to them our Anti-Slavery policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- (iii) where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- (iv) introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

2.4 From financial year 2016 we have included in the directors' report accompanying our annual financial statements a reference to the Company's Slavery and Human Trafficking Statement. The statement is presented on our website at the time our year-end financial statements are published.

3. RESPONSIBILITY FOR THE POLICY

3.1 Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

3.2 Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

4. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Whistleblowing Procedure – direct access to senior leadership

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees and may be found in the Human Resources section of the Way Manual on the Company's intranet site.

In summary, team members should approach either their Divisional Managing Director, or equivalent senior leader or the head of

human resources. If the matter is extremely serious then a director of the Company should be approached. The nature of the complaint will determine the Company's next course of action.

Confidential Feedback Line

Those who are accessing this policy because they:-

- are seeking a business relationship with us/our businesses or
- already have a business relationship with us/our businesses are also advised to familiarise themselves with the main features of our measures for combating modern slavery:

Suspicious Activity Confidential Feedback Line 0870 600 6400

This line may be accessed by employees or any other person wishing to raise a concern. You should call this line in any of the following circumstances:-

- You suspect a person acting on behalf of Pendragon or one of our businesses is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of Pendragon or one of our businesses who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of Pendragon or one of our businesses or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports to the Suspicious Activity Confidential Feedback line ("the Line") are kept in confidence, subject to the need for Pendragon to act responsibly and within the law. The source of reports to the Line will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed on our behalf or in any element of our supply chain.

Direct Communication

The Company encourages members of the public or people not employed by us to write, in confidence, to the company secretary or the Company's head of internal audit at Loxley House to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

5. SAFEGUARDS

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

6. COMMUNICATION AND AWARENESS OF THIS POLICY

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.

We expect all with whom we have business dealings to access our policies and procedures and use them to help us prevent acts which are offences under the Modern Slavery Act 2015.

7. REVIEW

Following its initial adoption, this Anti-Slavery and Human Trafficking policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This policy has been used to inform our Statement on Slavery and Human Trafficking which is republished annually.