

Modern Day Slavery – MOTUS Holdings (UK) Ltd

This scope of this policy applies to MOTUS Holdings (UK) Limited (“MOTUS”) and its’ Subsidiaries; Employees, Franchise & Manufacturing Partners and Suppliers of Goods & Services engaged in business with MOTUS. [MOTUS subsidiaries are: MOTUS Group (UK) Limited (Company No. 00653665). Also with effect from July 2019 MOTUS includes F&G Holdings Ltd, F&G Commercials Ltd and other related subsidiaries and ROCO Trucks Limited where all trade and assets were transferred to Motus Group (UK) Limited on 1st December 2019.

The Statement covers Modern Day Slavery and Human Trafficking in accordance with the Modern Day Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business for the financial year ended 30 June 2019.

Modern Day Slavery and Human Trafficking can take on many forms such as; slavery, servitude, forced labour, compulsory labour and human trafficking. Such activities are an affront to human dignity, an offence in UK law and completely contrary to the values of MOTUS.

Group overview

MOTUS is the largest independent commercial vehicle dealer group in the UK and, with its passenger vehicle interests included, ranks inside the Top 15 of all UK automotive dealer groups. Our operations encompass 128 automotive franchise outlets across 80 locations, covering passenger vehicles, trucks and vans – truck and van, 94 franchise outlets; passenger cars, 34 franchise outlets. The business additionally operates five specialist commercial vehicle body shops and has further interests in parts and service facilities and commercial vehicle equipment supply. We also have a network of 17 ATF sites, able to carry out DVSA MOT's on Commercial Vehicles.

We work with a number of franchise partners that include DAF Trucks, Mercedes Benz Trucks / Vans, VW Commercial Vehicles, ISUZU Trucks and pick-ups, IVECO, FORD Commercials, FIAT Professional, Renault Trucks, LDV, MAN Trucks, Vauxhall, FORD, Peugeot, Citroen, FIAT, NISSAN, SEAT, JEEP, Renault, Mazda, Alfa Romeo, Dacia, Mitsubishi, Abarth and KIA. The majority of our supplies are from our main franchise partners of passenger and commercial vehicles and parts.

MOTUS employs almost 3,500 people across its operations, operating on mainland UK. The UK business is owned by Motus Holdings Limited which is a JSE listed South African-based international diversified (non-manufacturing) business operating in the automotive sector with operations mainly in South Africa, UK and Australia.

Policy and principles

MOTUS is committed to complying with its obligations under the Modern Day Slavery Act and other relevant legislation relating to the detection and prevention of modern day slavery. In particular, MOTUS is committed to implementing and enforcing effective systems and controls that seek to ensure that modern day slavery is not taking place anywhere in its business or in its supply chains. The Company expects that any organisation within the scope of the legislation will also apply the same high standards.

The Company has zero tolerance for breaches in the Modern Day Slavery Act and has in place policies, processes, whistleblowing and auditing procedures to ensure that any organisation within the scope of the policy who transacts business with MOTUS complies with it.

The company will terminate any commercial relationships with suppliers if they are in breach of our policy and/or are found to have been involved in modern day slavery.

Our recruitment processes are transparent with appointments approved by Manager or Directors. There are robust procedures in place for the vetting of new employees that enables us to confirm their identities and ensure they are both paid directly and correctly.

Any breach of our Modern Day Slavery policy by any employee will result in disciplinary action which could result in dismissal for gross misconduct.

Managing risk in our supply chain

We are committed to maintaining the highest ethical standards across our supply chain. The prevention, detection and reporting of modern slavery in any part of the Company's business is the responsibility of all those working for the Company or under the Company's control. Individual management teams are responsible for ensuring compliance with laws and regulations, including compliance with the Modern Day Slavery policy.

To achieve this, MOTUS will ensure that:-

- All colleagues are aware of the Modern Day Slavery policy by making it available to view on the Company Intranets;
- Training on this policy, and on the risk our business faces in our supply chains, forms part of the induction process for all individuals who work with us;
- 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; and
- Managers and their teams will be responsible for ensuring that MOTUS has on record for suppliers a signed MOTUS declaration of compliance (to our Modern Day Slavery Policy).

Actions taken in financial year ended 30 June 2019

During the financial year ended 30 June 2019, MOTUS took the following steps with the intention of ensuring that slavery and human trafficking does not take place in its business or supply chains:-

1. Human Resource Policies
Our HR policies were updated in 2017/18 to reflect Modern Day Slavery requirements where required; these were again reviewed to confirm continued compliance in early 2019.
2. National Minimum Wage Reviews
We conduct national minimum wage reviews to verify all employees are paid in accordance with legal requirements on a regular basis.
3. Group Modern Day Slavery Policy
The Group Modern Slavery Policy was reviewed and updated to reflect all UK Group operations and their respective staff and subcontractors. The policy was provided to business Directors / Managers (and their respective teams) for consideration in their purchasing decisions and arrangements.
4. Risk assessment
A risk assessment of our supply chain was undertaken to identify those high risk industry / sectors within our business. The results of the risk assessment completed is to inform the supplier assurance and pre-screening arrangement that are to be considered / adopted by the Group.

Actions identified to be taken in the forthcoming financial year

The following steps have been identified to be performed in the current financial year to promote awareness of our anti-slavery and human trafficking arrangements:-

5. Employee induction and training
Our induction and training modules to be developed and obligations in relation to modern day slavery to be communicated to new employees as part of inductions provided and to business managers responsible for operations and purchasing.
6. Supplier Assurance (of high risk supplier categories)
A review of high risk suppliers identified in those high risk industry / sectors affecting our business is to be completed for suppliers with annualised spend exceeding £50k. This assessment may include obtaining confirmation from suppliers where appropriate that no modern day slavery risks exist in their supply chains and / or supplier visits (to confirm arrangements and visibility of required documents to provide reassurance that the risk of modern day slavery is mitigated).
7. Purchasing contractual documentation
Include contractual provisions where appropriate in our supply contracts confirming that our suppliers adhere to and accept our Policy and the Modern Day Slavery Act 2015.
8. Supplier Pre-Screening
Consider the introduction of supplier pre-screening arrangements where appropriate in our contract and tender processes.

Approval

This statement is made with respect to the financial year ended 30 June 2019 in accordance with section 54(1) of the Modern Day Slavery Act 2015. The statement will be reviewed and updated (if necessary) annually to reflect our ongoing commitment to ensuring that our business and supply chains are free from slavery and human trafficking.



Rob Truscott

Chief Executive Officer

10th December 2019