

25<sup>th</sup> January 2019

## **Keltruck Limited Modern Slavery Statement:**

Keltruck Limited (“Keltruck”, “us”, or “we”) is committed to conducting business with integrity and in a socially responsible and sustainable manner. From an ethical and legal standpoint this includes upholding the United Nations Global Compact’s principles relating to Human rights, labour practices, the environment and anti-corruption.

We were founded as a family run business and still hold many of the core principles linked to this. We aim not only to subscribe to the letter of the law, but to conduct business in such a way that respects all stakeholders and their human rights. We expect our supply chain and customers to do the same.

Keltruck is a household name in the commercial vehicle and road transport industry and is, on many measures, the largest independent Scania dealership in the world, employing circa 400 employees, with 19 depots across our network and with a supply chain of over 400 separate suppliers. This puts a lot of onus on our shoulders in terms of corporate and social responsibility.

We are pleased with the progress we have made this year in terms of improving the way we handle data and in our fight against modern slavery.

Internally we have safeguards in place to protect our staff; we have open whistle blowing channels available and perform random audits. We have rewritten our supplier code of conduct, which is detailed below. We sent this to each of our suppliers and are in the process of collecting responses. We will push each of our suppliers to conform to this at a minimum and reserve the right to terminate any agreement with any supplier which does not comply with our code of conduct. Suppliers who do not respond or do not conform to the code of conduct shall be reviewed.

Keltruck Limited may at any time review or request a supplier to complete a self-assessment and/or allow Keltruck upon reasonable notice to perform on site audits or reviews at the suppliers’ premises.

Sincerely,

Keltruck Limited Board of Directors

## Keltruck Limited Supplier Code of Conduct

### Introduction:

Keltruck Limited is committed to conducting business with integrity and in a socially responsible and sustainable way. This includes upholding the United Nations Global Compact's principles relating to human rights, labour practices, the environment and anti-corruption. Keltruck Limited expects its suppliers to share the commitment.

This Code of Conduct sets out minimum standards at Keltruck Limited. Keltruck requires its suppliers to comply with this Code of Conduct within their own business, and within their own supply chain.

Keltruck Limited may at any time review or request a supplier to complete a self-assessment and/or allow Keltruck upon reasonable notice to perform on site audits at the supplier's premises.

Keltruck Limited reserves the right to terminate any agreement with any supplier which does not comply with this Code of Conduct.

Keltruck Limited.

### Legal Compliance:

Keltruck Limited and its suppliers shall ensure that all activities are conducted in accordance with all applicable international, national and regional laws and regulations as a bare minimum standard.

### Social Sustainability:

Social sustainability relates to practices that contribute to the quality of life of both employees and communities that could be impacted by the company's operations. Keltruck Limited and its suppliers shall ensure that they meet the following basic standards;

#### **Human Rights:**

To respect and support human rights wherever they operate and to ensure that neither the supplier nor their employees are complicit in human rights abuses.

## **Child Labour:**

Child labour in any form is unacceptable. Keltruck and its supply chain shall not directly nor indirectly employ children below the minimum age of 15, unless the exceptions recognised by ILO 38 Minimum Age Convention (Article 6,7) apply.

Suppliers should have a child labour policy and remediation plan for child labour. If a child is found performing work in Keltruck or its own supply chain, the responsibility to identify measures to ensure the protection of the affected child is shared between Keltruck and the relevant supplier(s). It is of the utmost importance to always protect any identified children from being forced into more harmful work such as prostitution or drug trafficking.

## **Young Labour:**

Where anyone under the age of 18 is employed, their best interests must be the primary consideration.

## **Forced Labour:**

All workers are to be employed voluntarily. Forced, bonded or compulsory labour should not be used and employees should be free to leave their employment after reasonable notice. Deposits of money or identity papers should never be required from employees.

All employers shall provide all employees with a written contract in a language understood by them. The content should also be explained verbally in clear and understandable terms. The contract shall clearly state the voluntary nature of employment and procedures of leaving the job. You should only employ workers who are legally allowed to work in the receiving country.

## **Freedom of association:**

It should be respected that employees have the basic right to freely, voluntarily and without interference establish, join, or not join, unions and employee representation of their own choice and to bargain collectively.

## **Discrimination:**

All employees should be provided with a safe, respectful work environment free from all forms of unlawful discrimination, abuse and harassment. Employment should be fair and employees should be treated equally irrespective of their particular characteristics or demographics and all forms of unlawful discrimination should be prohibited.

## **Disciplinary Practices:**

All employees are to be treated with respect and dignity. Physical or verbal abuse or other harassment and any threats or other forms of intimidation are prohibited from the work place.

## **Working Hours:**

Working hours of employees must comply with national laws. Employees should be given the right to regular work breaks, paid annual leave and the right to at least one day off every seven days, unless exceptions are

defined by collective agreements. For avoidance of doubt, if local laws and / or any applicable collective bargaining agreement(s) are more beneficial to the employees than the above, such laws or agreement(s) shall be applied.

## **Wages and benefits:**

All wages and benefits should be detailed in the employment terms and conditions and should be provided to employees. These should be fair and reasonable pay and terms, which at the very least correspond to the legal minimum requirement. This should be based on ordinary working hours. Any overtime should be compensated.

## **Environmental Sustainability:**

Environmental sustainability is of utmost importance – we have a specific responsibility to the environment given the industry we operate in. For this reason, Keltruck and the supply chain must always endeavour to minimise impact on the environment, by reducing natural resource usage, harmful emissions, and by constantly seeking better alternatives for the long-term. We should be responsible to comply with the applicable environmental legislation and regulations as a bare minimum standard. Processes must be in place to actively improve the efficiency with which finite resources (such as energy, water, and raw materials) are used, and as far as possible move away from fossil fuel usage. Take due care to keep the negative impact on the environment as well as employees to a minimum in all activities. Avoid waste by recycling resources as effectively as possible. Dispose of all residual waste in a safe manner, avoiding any potentially harmful disposal methods. Have appropriate measures in place to improve the environmental performance of products and services when in use by the end user.

## **Business Ethics:**

Keltruck and its suppliers should be committed to conducting business in an ethical manner. The relationship between Keltruck and its suppliers shall be trustworthy and transparent. Keltruck Limited and its suppliers shall ensure that they comply with the following principles;

### **Anti-Bribery and Corruption:**

As part of Keltruck's ethical standards, Keltruck and its supply chain must refuse to deal directly or indirectly with any entity which solicits or is suspected of soliciting any form of bribe. We should ensure that all employees, sub contractors and other representative do not grant, offer, or accept any bribes, facilitation payment, inadmissible donations or other inadmissible payments or undue benefits to or from customers, officials, or other business partners. These can come in many forms, including: improper offer for payment; facilitation payments; commissions or kickbacks in monetary or other forms to or from employees, or organisations.

Decisions should always be made objectively and not influenced by personal interests or relationships.

### **Fair Market Behaviour:**

Business shall be conducted in compliance with competition and anti-trust law. Relationships between Keltruck Limited and the supplier should be reasonable and transparent. No anti-competitive agreements

should be concluded by the supplier, nor should Keltruck, with competitors; suppliers; customers or other third parties; and a dominant market position should not be abused.

## **Money Laundering:**

It is imperative to only conduct business relations with business partners of whose integrity you are convinced. Ensure that the applicable legal money laundering and terrorism financing provisions are not breached.

## **Whistle Blowing:**

There should be an environment where any employees may raise concerns in good faith, anonymously and without fear of retaliation. A culture of openness and accountability is encouraged.

## **Data Protection:**

Due to the nature of business it may be essential to share certain data points or suppliers may encounter various data points in the process of conducting duties. All data must be treated in line with the General Data Protection Regulation, PECR, or any other applicable laws and regulations at the very minimum. In line with data protection, we expect all our suppliers to sufficiently train staff to a sufficient level on the importance of data protection, what they can do with data and how to protect it.

## **Confidentiality:**

Any information received in the course of business must be kept confidential, only to be used for the intended purpose and never used for any personal or illegal benefit or gain. No data should be passed on or sold without prior written consent from one of the directors of Keltruck. Any information that is disclosed or uncovered must be treated with a high level of respect and confidentiality.

## **Personal Information:**

Keltruck require its suppliers to protect the personal data of employees, former employees, customers, suppliers and any other persons concerned. Suppliers shall only collect, process, use and store personal data where there is a legitimate lawful basis to do so. All personal data should be treated and processed in line with the principles of GDPR, the principles being: Data Minimisation; Purpose limitation; Lawful, fair & transparent processing; Accuracy, Storage limitation; Integrity and confidentiality, Accountability. Data should not be processed further than its original intent, unless requested in writing by a member of Keltruck. Any company handling data should adopt a *privacy by design* approach to ongoing business.

## **Supplier Management:**

Suppliers are responsible for ensuring compliance with the Keltruck Limited Supplier Code of Conduct in its supply chain. Suppliers shall conduct audits of their supply chain when requested by Keltruck within reason. Any non-compliance identified in the supplier's supply chain should be assessed and remedied within a reasonable time frame and without any additional cost to Keltruck. Keltruck Limited reserves the right to update this policy at any time and will immediately inform all suppliers if this is done.