

MRH (GB) LIMITED

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2017

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that MRH (GB) Limited (including its subsidiary companies) has taken and is continuing to take to minimise the risk that Modern Slavery or human trafficking is taking place within the company's business or supply chain.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. It is a complex phenomenon and we know that Modern Slavery is a growing and global issue given current patterns of population migration the world over. MRH (GB) Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity in all business dealings and to putting in place commercially reasonable systems and controls to minimise the risk of any form of Modern Slavery taking place within the business or our supply chain.

Our Business

The principal business of the MRH (GB) Limited group is the ownership and operation of retail motor fuel service stations in Great Britain and it is the largest independent owner and operator of retail motor fuel service stations in Great Britain and the third largest overall. The group also undertakes the following subordinate business activities:

- · The storage and wholesale supply of bulk liquid fuels on the Isle of Wight;
- The rental of property (primarily land forming part of a service station property owned by a group company but which is not required for the operation of the relevant service station);
- The operation of fast food franchises;
- The ownership and operation of three retail motor fuel service stations on Jersey;
- The wholesale supply of bulk liquid fuels on Jersey and Guernsey.

There are approximately two thousand suppliers to the Group.

Our Policies

We operate a number of internal policies and procedures to guide us in conducting our business in a legally-compliant and ethical manner. These include:

- 1. **Anti-slavery Policy**: This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- 2. Recruitment Procedure: We operate a robust recruitment procedure in respect of the employees of group companies, including conducting checks on the eligibility to work in the UK for all new employees and taking references, which we consider minimises the possibility that one of our employees has been subject to human trafficking or is being forced to work for us against their will.
- 3. Whistleblowing Policy: We operate a whistleblowing policy pursuant to the Public Interest Disclosure Act so that all employees know that they can raise concerns about the illegal treatment of colleagues, or illegal practices within our business or supply chain, without fear of negative consequences for them.
- 4. Tenant Screening Procedure: We conduct pre-contract screening against all major Sanctions Lists for all prospective tenants who intend to operate a hand car wash business on our land (and also upon renewal of existing leases) and we have a policy that we will not enter into a lease with an individual or corporate entity that is recorded on any such Sanctions List.
- Commission Retailer Audits: Group employees conduct periodic checks to ensure that the employment practices of Commission Retailers (see below for definition) meet the requirements of



the Immigration Act 2016 and we have also engaged the services of an external specialist consultant to undertake both random and targeted checks on the pre-employment procedures and documentary records of Commission Retailers who employ non-UK nationals.

Our High Risk Areas

Having risk-assessed our business we have identified that because we are not involved in commercial activities where much Modern Slavery has been found to occur we are at relatively low risk of having Modern Slavery present in our business or in our direct supply chain. However, to the extent that the risk exists we consider that the highest risk areas for Modern Slavery to occur within the business of the MRH (GB) Limited group are:

- 1. the operation of service stations; and
- 2. the undertaking of hand car wash businesses on the group's service station properties.

In respect of the operation of service stations the group's business model is to enter into arms-length contracts with independent third parties to (i) act as agent for the relevant group company in the sale of motor fuels and certain other products to consumers and (ii) provide services in relation to the day-to-day operation of the subject service station. As such, the group company that owns the service station does not employ any of the people that work at the service station. They are employed by the independent third party operator (known as a "Commission Retailer") and so the MRH (GB) Limited group has little control over the employment practices and staffing activities of the Retailer at a service station. Across the sector (so not just in the Company's business) - and particularly in the south and east of England - a significant minority of people who work in service stations are non-UK nationals and so this does provide a potential opportunity for criminals involved in human trafficking and forced labour activities.

In respect of hand car wash businesses these are operated by independent third parties who lease plots of land at certain of the group's service station properties. As at 1 January 2017 twenty five such businesses were operating on land owned by group companies. Across the sector (so not just in the Company's business) a high proportion of people who own and who work in these businesses are non-UK nationals and so this also provides a potential opportunity for criminals involved in human trafficking and forced labour activities.

Our Performance Indicators

We will consider it a reasonable indicator that slavery and/or human trafficking is not taking place within our business if (a) no reports are received from employees, the public, or law enforcement agencies to indicate that slavery or human trafficking practices have been identified in relation to our business or our trading partners and (b) none of our existing tenants who operate a hand car wash business on our land appear on a Sanctions List.

Approval For This Statement

This statement was approved by the Chief Executive Officer of MRH (GB) Limited

Name: Karen Dickens (Chief Executive Officer)

Date:

Signature:

204 JUNE 2017