

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Introduction

- 1.1** Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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. We have a zero-tolerance approach to modern slavery and 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 business or in any of our supply chains.
- 1.2** We are also 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 expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3** This Statement complements our Code of Business Conduct and Code of Ethical Trading.

http://www.northgateplc.com/index.php/download_file/650/

http://www.northgateplc.com/files/3214/2659/3825/Code_of_business_conduct.pdf

2. Our business

Northgate plc, listed on the London Stock Exchange, is the parent company of a group of companies engaged in the provision of vehicle rental and related activities in the UK, Spain and Ireland. The head office is in the UK and the principal operating subsidiaries are Northgate Vehicle Hire Limited, Northgate Vehicle Sales Limited, Northgate Espana Renting Flexible S.A. and Northgate Vehicle Hire (Ireland) Limited. The group employs over 2,900 people across the three jurisdictions.

3. Our supply chain

We recognise the responsibility that we have to work with all parties in our business and supply chain to ensure that those within it are treated fairly, humanely and with respect. We believe this means ensuring that workers are not exploited or subject to unsafe or inhumane working conditions, that child labour is not used and that our staff should be free to raise any concerns or suspicions they have so that they can be investigated and acted upon. Staff are encouraged to raise any concerns with their managers or through our confidential whistleblowing procedure.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. This Statement reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

To support compliance with this Statement we have in place systems to:

- Identify and assess potential risk areas in our supply chain.
- Mitigate the risk of slavery and human trafficking occurring in our supply chain.
- Monitor potential risk areas in our supply chain.
- Protect whistle-blowers.

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3. Our supply chain CONTINUED

To ensure those in our supply chain and contractors comply with our values we require them to agree to comply with our Code of Ethical Trading:

http://www.northgateplc.com/files/6614/7851/3643/Supplier_Ethical_Trading_Declaration_May_2016.pdf

or confirm that they have in place their own equivalent code of at least the same standard and provide us with a copy of such code. Key provisions require our suppliers to agree that they will not use child labour, not allow inhumane treatment, not practise discrimination and not allow excessive hours.

In the event that our suppliers do not comply with our Code of Ethical Trading, we reserve the right to terminate the arrangement.

Going forward, we intend to analyse our supply chain in more detail, highlighting those in higher risk areas, including nature of business and geographical area of operations, and will seek to ascertain relevant compliance with regard to their own supply chain.

4. Our people

4.1 Internally, our Equal Opportunity Policy addresses workplace issues such as Recruitment and Selection. Monthly checks are conducted for National Minimum Wage to ensure that our employees receive the correct rates of pay in all instances.

Evidence is required to be available to confirm that Northgate have checked and are confident that all staff recruited by Northgate are eligible to live and work in the country of employment.

4.2 Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide our staff with training as part of our induction programme and repeat it on a regular basis thereafter.

This Statement which applies to our businesses in the UK, Spain and Ireland, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2017.



Chief Executive Officer
Northgate plc