



MODERN SLAVERY STATEMENT

SECTION ONE: Introduction by the CEO, Tim Shoveller

This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 and relates to the financial year ending 31 December 2023. This Statement covers all companies within the Freightliner Group, in particular those entities, which under the Modern Slavery Act 2015, are mandated to publish an annual Modern Slavery Statement:

- Pentalver Cannock Limited; and
- Pentalver Transport Limited

This statement has been approved by the directors of the Pentalver entities.

SECTION TWO: Our Organisation's Structure

Freightliner is an established provider of intermodal and heavy haul rail freight logistics solutions, operating services across the entire UK and parts of Continental Europe, employing over 3000 employees. Our parent company is investor Brookfield Infrastructure and Singapore's state owned GIC.

Freightliner's subsidiary, Pentalver, operates off-dock container terminals (most under long-term lease) strategically placed at each of the four major seaports of Felixstowe, Southampton, London Gateway and Tilbury, as well as an inland terminal located at Cannock near many of the UK's largest distribution centres. Pentalver offers container storage, transport, specialist haulage, cargo handling, container repairs and refrigeration services. We are also one of the UK's leading providers of ISO shipping containers offering new containers, second-hand containers, refrigerated containers and container conversion.

SECTION THREE: Our Policy on Slavery and Human Trafficking

Consistent with the Freightliner Group core values, which relate to respect and integrity, our Modern Slavery and Human Trafficking Policy reflects our commitment to acting ethically 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 chains. We continuously review and update all our policies.

SECTION FOUR: Our Supply Chains

In the United Kingdom, Freightliner has over 1500 suppliers across a wide range of sectors, including the rail infrastructure operator (Network Rail), engineering suppliers, fuel suppliers, road transport suppliers, port companies, asset lessors, information technology service providers, insurance and facilities management companies. In addition, the firm works with a number of professionals, consultants, and contractors.

We believe those areas which give rise to the highest modern slavery risk are:

- Mechanical equipment and parts supply chains
- Freightliner's suppliers who subcontract manufacturing processes
- Supply from specific high risk countries where modern slavery is higher e.g. India (restriction of freedom of movement), China (state-imposed forced labour)



- Specific goods or services not for resale e.g. logistics service providers, cleaning services, employment agencies, waste recycling, warehousing

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify, assess and monitor potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Protect whistle blowers

SECTION FIVE: What Have We Done?

(i) Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a requirement for each new Supplier to agree to adhere to our Supplier Code of Conduct. To effectively promote Modern Slavery legislation our supplier conditions of trading clearly state our expectations that our suppliers will comply with the modern slavery legislation and affirm our intention to step away (without penalty) if any occurrences of non-compliance with modern slavery legislation is found. When onboarding a new supplier, we ask the suppliers to sign that they have understood and support our Code of Ethics and Sustainability Charter, and we track on an annual basis that those suppliers with a spend over £250K have a modern slavery statement (available on their website).

We have a compliance team, which consists of involvement from the following departments:

- Legal
- Audit and compliance
- Human resources
- Procurement
- Sales

(ii) Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff, suppliers and providers.

(iii) Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking: we will endeavour to do a retrospective assessment of all existing high value and/or high risk suppliers with a spend over £250K over the next twelve months, to ensure that said suppliers have in place sufficient anti-slavery policies and a modern slavery statement published.

SECTION SIX: Effectiveness of our procedures

In the financial year to 31st December 2023, there were no reported breaches relating to modern slavery made to our whistleblowing hotline, nor any instances of remedial action being required with respect to any of our suppliers. We continually review our systems and controls to assess how effective we have been in ensuring that there is no slavery or human trafficking in our supply chains and will make improvements and changes where necessary.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Group's slavery and human trafficking statement for the financial year ending 31 December 2023. It was approved by the board on 29 April 2024.

A handwritten signature in black ink, appearing to read "Shoveller", is written over a light grey horizontal line.

Timothy Shoveller
CEO Freightliner Group and Pentalver
29 April 2024