

# Modern Slavery Statement

**Review and Retention** 

This document will be reviewed at least annually from the date of issue or earlier if the volume of amendments indicates a need for re-issue

VERSION HISTORY						
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR		
1.001 - 1.009	N/A	Apr-21	Initial versions	Various		
1.010	Victoria Knight	Apr-21	Periodic review	Chris Mee		
1.011	Andrea Roughley	Sep-23	Re-template to ISO 9001 standards	Ashley Palmer		
1.012	Sean Derrig	Oct-24	Review and amend for Pullman Fleet Solutions as standalone organisation	Helen Shields		

#### **Document Change History**

**Used By:** Pullman Fleet Solutions

 Document: Modern Slavery Statement

 Organisation (area): Human Resources

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 Revision: 012
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 Classification: INTERNAL

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#### 1.1. Overview

At Pullman we are committed to running our business responsibly. We strive to maintain the highest standards of fairness, transparency and integrity in all we do - and this includes encouraging our supply chain partners to meet the high standards that we set for ourselves.

Pullman operates within a compliance led policy framework, which means when we procure goods or services, this is managed through our commercial team and the process is subject to robust checks throughout.

# 1.2. Our business

Pullman is one of the most recognisable industry names for HGV maintenance and repair in the UK. With a 30-year heritage of managing mission-critical HGV fleets - including tractors, rigids, trailers, fridge units, tail-lifts, tankers and ancillary of all marques - we provide a 'one-stop-shop' service for your fleet needs.

Pullman operate 13 Workshops across the United Kingdom. The organisation is controlled and managed by a board of Directors including a Managing Director. Pullman are owned by the Aurelius Group who are a globally active alternative investor focused on Private Equity, Private Debt and Real Estate.

Pullman Head Office and registered company address is in Doncaster, England, where we operate a hybrid working model.

The majority of labour supplied to the Organisation in pursuance of its operation is carried out across the United Kingdom, the vast majority in England with 1 in Livingston, Scotland.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Recruitment we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing our whistleblowing policy ensures that all employees know that they can raise concerns about how colleagues are being treated or practices within our business, or our supply chain, without fear of reprisal.
- Health and Safety this policy sets out our approach to ensure we provide a healthy working environment for our staff and contractors that work out of our premises.

# 1.3. Our supply chains

Our supply chain includes suppliers of direct goods and services (roadside assistance, tyre replacement, maintenance parts, etc) and suppliers of indirect services (professional services, facilities, sales and marketing agencies).

We conduct appropriate due diligence checks on all suppliers prior to authorising them as a supplier to us. This due diligence includes assessing regulatory licences and certificates,

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compliance with relevant regulatory bodies, checks to determine the financial stability of the supplier as well as carrying out supplier audits, where appropriate.

# 1.4. Further steps

We are taking the following further steps to combat slavery and human trafficking:

- 1. Risk assess all new suppliers and ask them to certify that they have taken steps to ensure prevention of modern slavery within their own organisation and supply chain
- 2. Notify all existing suppliers of our expectations and their obligations in relation to the prohibition of modern slavery
- 3. All Pullman employees have access to a confidential and secure portal for reporting issues known as 'WHISS'. This is paid for by Pullman but managed by an independent 3<sup>rd</sup> party who provide a whistleblowing service.
- 4. All managers and their direct reports are familiar with the service along with the rights and protections of a 'whistleblower'.
- 5. Incorporate anti-slavery and human trafficking obligations into our commercial agreements and subcontracting arrangements on a risk assessed basis
- 6. Include appropriate measures in our due diligence processes for sourcing suppliers, subcontractors and acquisitions on a risk assessed basis
- 7. Provide training to relevant employees to ensure a high-level understanding of the risks of modern slavery and human trafficking; and
- 8. Where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's slavery and human trafficking statement for the current financial year.

# 2. Document Ownership and Confidentiality

This document is classified as [INTERNAL] and should not be shared with any 3rd party without the written consent of Human Resources.

This and any associated documentation remain the property of Pullman Fleet Solutions and should be returned if requested.

If this document is printed it may not be the latest version. For the latest version contact your HR representative.

# 3. Roles & Responsibilities

HR Manager:

- Approval of this policy.
- Business ownership of this policy and related annexes (as listed).

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Executive:

- Sponsorship of this policy.
- Support the implementation of this policy including staff rollout and that staff are provided with adequate time to complete any education (if applicable) and understand their responsibilities based on this policy.

#### Business Managers/Heads Of Departments

• Promoting the importance of this policy to staff and ensuring they are given the necessary support to enable them to comply with all HR policy direction, protocols and education.

All Staff:

- Compliance with this policy and supporting annexes.
- Awareness that a breach of this policy or supporting annexes shall be treated as an incident and may be dealt with in accordance with the PFS disciplinary process.

#### 4. Who can I contact for more information?

For more information in relation to this policy, please contact your line manager or HR.

#### 5. Exceptions to Policy

If you are unable to comply with any part of this Policy, then a policy exception needs to be submitted to the Policy owner for approval.

#### 6. Document Sign Off

VERSION	APPROVED BY	JOB TITLE	DATE
1.010	V Knight	HR Director	Apr 21
1.011	A Roughley	Interim HR Director	Sep 23
10.012	S Derrig	HR Manager	Oct 24