



# HUMAN TRAFFICKING & FORCED LABOR POLICY

## PENTAGON GLOBAL MANAGEMENT SYSTEM

---

**Pentagon Freight Services is committed to compliance with the highest standards of business conduct and ethics. It is the Company's policy to conduct all business in an honest, ethical and legally responsible manner.**

All Directors, managers, employees, contractors and third-party agents representing the Company, or its clients are expected, at all times and in all countries, to ensure its operations and supply chain are free from human trafficking, forced labor and child labor, in compliance with applicable regulations. These regulations include, but are not limited to, the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act and/or the USA Government's Federal Acquisition Regulation on Ending Trafficking in Persons, as well as local laws in the countries in which we operate.

Our objective is to create a culture and environment which will ensure the actions of all Directors, managers and employees of the Company, as well as contractors and third-party agents, in the performance of his or her duties on behalf of the Company, are compliant with all applicable regulations prohibiting human trafficking, forced labor and child labor.

The CEO and Group Directors of Pentagon Freight Services are committed to the highest standards of ethics and compliance and will not tolerate the use of human trafficking, forced labor, or child labor in its operations or in its supply chain. In furtherance of this commitment, they have designated the Global Compliance Director to deliver the objectives of this policy through the implementation and administration of a Policy Against Human Trafficking & Forced Labor within the Ethics and Compliance Program.

To achieve this objective, we will:

- ◆ Promote a culture in which all Pentagon Freight Services Directors, managers and employees, as well as contractors and third-party agents, share this commitment;
- ◆ Provide a management framework and operational guidance in the form of processes, procedures and training to recognize human trafficking, forced labor and child labor, identify and evaluate risks by conducting periodic and ongoing risk assessments, perform due diligence, monitor and audit adherence to determine the appropriate actions to address risks in a planned, systematic, efficient and compliant manner, and ensure continual improvement;
- ◆ Comply with all relevant regulatory and other requirements, including the prohibition of human trafficking, forced labor and child labor obligations included in contractual agreements;
- ◆ Provide our customers, contractors, third party agents and other business partners with the opportunity to contribute to the continual improvement of our operations; and
- ◆ Review this policy on an annual basis to ensure its continued relevance and appropriateness.

The effectiveness of any system is dependent on the commitment and competence of the people using it. All Pentagon Freight Services Directors, managers and employees will receive instruction in the use of and requirements of our compliance and ethics management system and will be trained and equipped to carry out their roles competently.

Employees are encouraged to participate and contribute to improving service and product quality. With the commitment and involvement of our employees in all business operations, we will achieve our ethics and compliance goals and continue to drive towards the achievement and maintenance of our corporate mission.

Any potential violations of this policy must be brought to the attention of the Global Compliance Director. Reports may be made anonymously and will be treated as confidential to the extent allowed by law. The Company prohibits retaliation for good faith reporting of suspected misconduct.

Failure to comply with this policy may subject Directors, managers, employees, contractors and third-party agents representing the Company to criminal or civil penalties, as well as to disciplinary action by the Company up to and including termination.

Ashley Taylor  
Group CEO  
31<sup>st</sup> January 2018