

Date: April 2021

Subject: MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Pursuant to section 54 of the United Kingdom Modern Slavery Act 2015 (“MSA”), this statement constitutes the modern slavery and human trafficking statement (“Modern Slavery Statement”) of Pentagon Holdings Ltd and its UK subsidiaries, including Pentagon Freight Services PLC and Pentagon Transport Ltd (collectively, “Pentagon Group”), as required under the MSA.

The MSA prohibits slavery, servitude, forced or compulsory labour and human trafficking (“Modern Slavery”). The Pentagon Group is committed to combatting all forms of Modern Slavery that could in any way be connected to our business and supply chain.

About Pentagon Group

The Pentagon Group is a freight forwarding & logistics service provider to the energy and resource industries. Our headquarters is located in Dartford, UK, with regional offices in the USA, the UAE, Singapore, and Australia. Further information on the Pentagon Group’s services and global operations can be found on our website, <https://www.pentagonfreight.com/>

We understand that all businesses face a risk of Modern Slavery existing in their supply chain and at the Pentagon Group we are committed to combatting Modern Slavery by preventing the recruitment, movement and harbouring of people for the purposes of exploitation within our business and supply chains. Our Code of Conduct and our Global Management System are relevant to reducing the risk of Modern Slavery affecting our business and supply chain.

The Pentagon Group’s significant suppliers include services procured to facilitate our freight forwarding and logistics operations, for example air and ocean carriers, trucking companies, and other external service providers.

Policies, procedures, and steps taken in respect of the prevention of Modern Slavery and Human Trafficking

The Pentagon Group functions under a number of policies which set ethical standards, encourage the reporting of concerns or whistle blowing, and are relevant in assessing internal Modern Slavery risks and the risks presented by suppliers, as follows:

- Our [Code of Conduct](#), particularly under our values of Respect for People and Non-Discrimination and Fair Dealings, as well as our Human Trafficking and Forced Labor Policy, require compliance with laws and regulations, health and safety procedures, and provides a procedure for reporting illegal and unethical behaviour. It applies to all directors, officers, managers, employees and should also be followed by all agents and external service providers. These values are continuously affirmed in our associated work practices, third party relationships, business documentation and adherence to all applicable laws and regulations.

- We perform due diligence on potential and existing suppliers, including agents and external service providers. This diligence includes screening processes on compliance with applicable laws such as human rights and human trafficking risk events. It also conducts internal and onsite supplier audits, if deemed necessary, in order to verify our supply chain suppliers' conformance with our Code of Conduct and other policy commitments.
- Our agreements with agents and external service providers, provide statements of intent and, amongst other objectives, are focused on pursuing business with integrity and respect and working with suppliers whose policies are consistent with our own.
- We provide policies, procedures, guidance and training for **ethical, compliant and legal decisions** in the Pentagon Group workplace, in order to raise awareness of Modern Slavery and human trafficking risks, along with instruction on their expected reaction if they know or suspect these risks are present, internally or externally.
- Integration of compliance controls is continuously evolving within our business and transparency, responsibility and respect for human rights are critical drivers for our collective achievements.

The Director of Global Compliance is responsible for producing this Modern Slavery and Human Trafficking Statement for Pentagon Holdings Ltd. And Pentagon Freight Services PLC.

This Statement has been approved by the Pentagon Group Board