

Pentagon Investments Limited and Group of Companies including:  
Lawrence Vehicles Limited (T/A Lothian DAF and Lancashire DAF and subsidiaries)  
Meadow Group Services Limited  
Mertrux Limited  
Pentagon Vehicle Rentals Limited

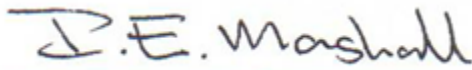
## **Anti - Slavery and Human Trafficking Policy Statement**

### **Introduction from Ian Marshall, Group Managing Director**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.



Ian Marshall  
Group Managing Director  
1<sup>st</sup> August 2025

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## **Anti - Slavery and Human Trafficking Policy**

### **Purpose**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Pentagon Investments Limited, Mertrux Limited, and Lawrence Vehicles Limited (“the Group”) to ensure that slavery and human trafficking are not taking place in any part of our business or supply chains.

The Group is committed to acting ethically and with integrity in all our business relationships, and to implementing effective systems and controls to prevent modern slavery in any form.

### **Our Structure and Operations**

Mertrux Limited is a franchised Mercedes-Benz Commercial Vehicle Dealer, retailing and repairing the Mercedes-Benz van and truck range, and supplying parts and accessories within the Mercedes-Benz UK network.

Mertrux operates from its head office in Derby, with additional branches in Leicester, Mansfield, and Nottingham.

Lawrence Vehicles Limited is a franchised DAF Commercial Vehicle Dealer, retailing and repairing DAF trucks and supplying parts and accessories within the DAF UK network.

Lawrence Vehicles Limited has its head office in Derby, with branches in Lancashire and Lothian.

Pentagon Investments Limited is the parent company of both Mertrux Limited and Lawrence Vehicles Limited and supports associated companies Pentagon Vehicle Rentals Limited and Meadow Group Services Limited, which provide shared services including Human Resources, Finance, and IT.

The Group employs approximately 387 people across six main sites in the UK.

### **Our Supply Chains**

Our supply chains include the sourcing of vehicles, bodies, ancillary equipment, and parts relating to the sale and repair of new commercial vehicles.

The automotive supply chain is among the most complex in any industry, often involving multiple tiers between manufacturers and the sources of raw materials. We recognise the challenges this presents for transparency, and we work closely with our suppliers to promote responsible business practices and respect for human rights.

Our suppliers are expected to uphold ethical labour standards and to implement measures that prevent forced, bonded, or child labour.

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## **Policies and Governance**

Our commitment to combating modern slavery is supported by the following key policies:

- Anti-Slavery and Human Trafficking Policy – outlining our zero-tolerance approach to slavery and trafficking.
- Supplier Code of Conduct – requiring all suppliers to:
  - Prohibit forced, bonded, and child labour.
  - Ensure safe working conditions.
  - Respect freedom of association and fair pay.
  - Comply with all applicable human rights and labour laws.
- Whistleblowing Policy – enabling employees and others to raise concerns confidentially and without fear of reprisal. Reports made in good faith are treated confidentially and investigated promptly.

These policies are reviewed bi-annually and whenever legislation changes and are made available to employees and suppliers through our internal and external communication channels.

## **Due Diligence and Risk Management**

We conduct due diligence to identify, prevent, and mitigate modern slavery risks in our business and supply chains. This includes:

- Supplier onboarding checks, requiring documented evidence of anti-slavery measures.
- Contractual safeguards, including the right to terminate contracts for breaches of anti-slavery obligations.
- Ongoing risk assessments across our supply chains, focusing on higher-risk areas such as raw materials, outsourced labour, and logistics.
- ‘One-up’ due diligence – expecting each supplier to apply similar standards to their own supply chains.
- Internal employment controls, including right-to-work checks for all employees and vetting of agency workers.
- Whistleblowing mechanisms, ensuring employees and stakeholders can report concerns safely.

Where risks or breaches are identified, corrective action plans are implemented, tracked to closure, and reported to the Board.

## **Training and Awareness**

We provide training and resources to ensure our teams understand and can identify modern slavery risks.

- Training is provided for managers, HR, and procurement staff.
- Effectiveness is monitored through completion rates, knowledge checks, and staff surveys.

Awareness of modern slavery risks is also embedded in our induction and ongoing supplier management processes.

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## **Measuring Effectiveness**

We monitor progress through the following Key Performance Indicators (KPIs):

- 100% of new suppliers signing our Supplier Code of Conduct.
- 95% or higher completion rate for anti-slavery training.
- At least 5 supplier audits conducted per year.
- All reported concerns investigated within 10 working days.
- Remediation plans completed for all non-compliance findings.

Case studies demonstrating practical action will be included in our annual statement in line with 2025 Government guidance.

## **Continuous Improvement and Transparency**

We are committed to continuous improvement in our approach to preventing modern slavery. Our policy and practices will be reviewed annually, and we will update them to reflect changes in legislation, regulatory expectations, and industry best practice.

This statement and supporting documents will be:

- Published on our website with a clear link from the homepage.
- Available online for at least five years to demonstrate progress over time.
- Registered on the UK Government Modern Slavery Statement Registry in line with forthcoming requirements.

## **Responsibility**

Overall responsibility for implementing and monitoring this policy rests with the Group Managing Director. Departmental management teams are responsible for ensuring compliance within their areas. All employees are expected to adhere to this policy and uphold its principles.

Signed for and on behalf of Pentagon Investments Limited and its subsidiaries Mertrux Limited and Lawrence Vehicles Limited.



**Ian Marshall**  
**Group Managing Director**  
**1 August 2025**