



## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

Barloworld Holdings Limited is a commercial organisation and we are required to make this Modern Slavery and Human Trafficking statement pursuant to section 54(1) of the Modern Slavery Act 2015, for the financial year ending 30 September 2022.

### **The Group's Structure**

Barloworld Holdings Limited is part of the Barloworld Limited Group ("**Barloworld**") which has a number of subsidiaries including Barloworld UK Limited, Barloworld Equipment UK Limited, Vostochnaya Technica UK Limited and Barloworld Mongolia Limited. Our parent company is Barloworld Limited, which has its head office in South Africa.

### **The Group's Businesses**

Barloworld is a distributor of leading global brands providing integrated sales, rental, fleet management, product support and logistics solutions. The group has adopted several policies relevant to the identification of modern slavery risks including: Anti-Bribery and Corruption, Environmental, Whistleblowing, Health and Safety, Employee Code of Conduct, Supplier Code of Conduct and updated Human Rights policy. These policies are regularly reviewed and copies are available on the Barloworld Limited, SA website at <https://www.barloworld.com/sustainability/policies-and-disclosures>. Awareness about human rights topics will be incorporated in the respective Ethics and Compliance Training programmes and will be provided to all employees on a biennial basis. The Home Office "Modern Slavery Awareness and Victim Identification Guidance" together with copies of the Barloworld Supplier Code of Conduct, Human Rights Policy and Whistleblowing policies have been circulated to all UK employees to provide key facts, clear and up to date information and raise awareness of Modern Slavery. Barloworld employees and management receive regular training on the Barloworld Worldwide Code of Conduct and on adherence to our values and the Barloworld way of doing business.

### **The Group's Supply Chain**

We do not currently verify our product supply chain or audit suppliers specifically to evaluate risks of slavery or human trafficking or require our existing direct suppliers ("**Suppliers**") to certify that materials incorporated into products comply with laws regarding slavery and human trafficking in the countries in which they are doing business. However, the Barloworld Supplier Code of Conduct applies to all potential and existing suppliers and sets out the ethical standards required to do business with the Barloworld Group.

### **Supplier Code of Conduct**

As part of the qualification and selection process, new suppliers are assessed (through the Supplier Due Diligence process) to ensure adherence to the ethical standards within its supply chain and international best practices in human rights, health & safety, privacy / data protection, social responsibility and environmental standards, when undertaking contractual obligations with Barloworld or any Group company. Current Suppliers are prioritised for assessment based on the potential sustainability risk ranking associated with the goods and services delivered, privacy / data protection risks, anti-bribery and corruption risks, and including potential reputational risks from adverse media news coverage.

Barloworld enters into business relationships with Suppliers, who demonstrate our values of integrity, excellence, teamwork, commitment, and sustainability. Suppliers are required to commit to the ethical principles outlined in the Supplier Code of Conduct and to comply with sound business practices that Barloworld embraces, comply with the law and conduct activities in a manner that respects human rights and is mindful of their impact on the environment. Suppliers are not required to buy Barloworld products in order to compete for business or to continue to be a Supplier. The Supplier is required to communicate the contents of the Supplier Code of Conduct

to its employees, subcontractors and other business partners, who are involved in supplying products and services to Barloworld and to ensure their adherence to these standards.

We expect our Suppliers to support our values and comply with all laws applicable to their business and the laws of the countries in which they conduct their business, in keeping with our Supplier Code of Conduct. Furthermore, as a signatory to the United Nations Global Compact, Barloworld expects its Suppliers to support the 10 principles, including the elimination of all forms of forced and compulsory labour (Principle 4) and the effective abolition of child labour (Principle 5).

### **Whistleblowing**

In line with Barloworld's Whistleblowing Policy, anyone who becomes aware of a circumstance or action that violates, or appears to violate the Supplier Code of Conduct, Barloworld policies or applicable law is encouraged to raise issues and concerns using the appropriate communication and whistle-blowing channels, including via walk-in reporting directly to management or the Barloworld Ethics Line, which is an independent and confidential telephone, e-mail and web-based reporting channel by which employees or others can report unethical behaviour that affects Barloworld. Barloworld will not penalise or subject anyone to retaliation as a result of raising an ethical issue in good faith.

Barloworld is committed in the next twelve months, to continue to evolve and strengthen its approach to managing the risk of Modern Slavery and Human Trafficking within its businesses.



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**Jaco Schreuder**  
Director

Approved by Barloworld Holdings Limited Board of Directors  
4 November 2022