

# Modern Slavery Statement



## About Us

Moto\* is the UK's largest Motorway Service Area ("**MSA**") operator, serving more than 120 million visitors every year across 70 UK sites. Moto provides a wide range of services for motorists including toilets, shower facilities, food and drink, parking, EV charging and fuel.

Our motorway service areas are open 24 hours a day, 365 days a year and our restaurants, shops and forecourts offer market-leading brands including BP, Burger King, Costa, Greggs, KFC, M&S, Pret and WH Smith. Moto is the leading provider of ultra-rapid EV charging across the UK motorway network.

Moto's purpose is to "*Brighten People's Journeys Through Life*". Our values underpin the winning culture that we are aspiring to achieve and drive every decision we make. Our values influence every aspect of what we do, for our colleagues our customers and our communities.

Moto is owned by Universities Superannuation Scheme, in partnership with CVC Capital Partners.

## Our Environmental, Social and Governance ("**ESG**") Strategy

To successfully deliver our ESG strategy, our shareholders have established an ESG Committee as a subgroup of the main Board, who will:

- take a strategic overview of 'Positive Journeys';
- monitor progress and delivery against this strategy; and
- be responsible for an overview of ESG policy compliance and reporting with any recommendations to the Board.

Moto's Operating Board is responsible for defining the ESG strategy and relevant targets and KPIs as well as reviewing ESG-related policies, processes, and practices to ensure they remain relevant, up to date and reflect industry best practice. Our ESG governance and programme structure is cross-functional and provides opportunity for us to harness the knowledge and experience of colleagues across the business.

The ESG Committee meets regularly with Operating Board ESG meetings taking place quarterly to review progress on targets and evaluate any risks and opportunities. Underpinning these are the individual ESG programme working groups each chaired by an Operating Board Director, who meet regularly. The groups are responsible for the detailed environmental and social activities that form part of our day-to-day business operations.

We are working together to create a more sustainable future by taking positive steps to protect our planet, customers, colleagues and communities, whilst continuing to

brighten peoples' journeys through life. Our Environmental, Social and Governance ("ESG") goals can be found at <https://moto-way.com/sustainability/>

## Our Supply Chains

At Moto, we largely operate on a franchise model basis in relation to the partner brands listed above (apart from BP) and work closely with them. In addition, we also have many suppliers and wholesalers supplying us with a range of goods and services ranging from utilities, IT, construction, EV charging and related infrastructure, cleaning, parking and maintenance services to the toys, books and magazines sold in our MSAs.

The principal areas of risk we face, related to Modern Slavery, include:

- our supply chain;
- any outsourced activities;
- cleaning and catering suppliers;
- recruitment (in-house and through agencies) and;
- general maintenance contractors.

We manage these risk areas through the procedures and policies Moto have in place i.e. the Asylum and Immigration Policy, Right to Work checks and supplier due diligence.

## Our Approach to Tackling Modern Slavery

As part of the "Social" element of our ESG Strategy (referred to above), we are committed to the values of *"Do the Right Thing"* and *"Set the Bar High"*, amongst others, and acting ethically and with integrity in all our business relationships, including in our dealings with our supply chain.

Moto operates a zero-tolerance approach towards any form of slavery, servitude, human trafficking or forced labour (collectively termed **"Modern Slavery"**). Moto's Operating Board has accountability for ensuring that Moto does not breach any laws on Modern Slavery.

We work every day to create the right conditions for our colleagues and others with whom we work, to flourish and achieve their full potential.

## Our Policies

- Our **Supplier Code of Conduct** enables us to ensure that all our third-party suppliers adhere to our standards, including with respect to Modern Slavery;
- Our **Whistleblowing Policy** enables all colleagues to raise concerns about business practices or the supply chain, including in relation to Modern Slavery, without fear of reprisals;

- Our **Anti-Bribery and Corruption Policy** enables all colleagues to raise concerns about any suspected bribery or corruption, including that which could be linked to Modern Slavery;
- Our **ESG Policy** recognises that our colleagues are at the heart of our business and that their wellbeing is paramount;
- Our **Asylum and Immigration Policy** enables us to ensure that leaders responsible for recruiting and employing colleagues are aware of the Right to Work checks and practices to be carried out to ensure compliance with applicable laws and regulations, including with respect to Modern Slavery; and
- Our **Modern Slavery Policy** enables all colleagues to properly understand what Modern Slavery is, what our key risk areas are, and how to identify and report any instances of Modern Slavery.

So that our colleagues are aware of the standards expected and how to report any concerns, our colleagues have access to all our policies from the point of onboarding.

## **Due Diligence and Risk Assessment/Procedures**

### **Our Suppliers**

- Our directed suppliers, undergo thorough due diligence checks, including assessments regarding Modern Slavery risks and compliance;
- For all suppliers, we refer to compliance with our Supplier Code of Conduct as a pre-requisite in our documentation at Request for Quotation stage;
- All our precedent supplier contracts contain:
  - (a) an anti-slavery clause which we endeavour to ensure flows down through all layers of our supply chain and prohibits suppliers and their employees from engaging in slavery or human trafficking; and
  - (b) an audit clause which allows us to monitor the supplier's compliance with Modern Slavery laws, amongst other things;
- We endeavour to contract with all suppliers using our Moto precedent supplier contract terms but where this is not possible, we always seek to include an anti-slavery clause which prohibits suppliers and their employees from engaging in slavery or human trafficking and an audit clause which allows us to monitor the supplier's compliance with modern slavery laws, amongst other things;
- We do not tolerate slavery and human trafficking within our supply chains; and

- We have implemented a contract and supplier management tool to enhance our visibility over our supplier base.

### **Our Colleagues**

- We complete a Right to Work check for all new hires to confirm the identity of the worker and to verify their right to work in the UK. We have strengthened these checks by engaging TrustID, an accredited digital identity verification provider, which enhances the robustness and consistency of our Right to Work process by using secure, technology-driven authentication methods to validate identity documents, reduce the risk of human error or fraudulent documentation, and ensure compliance with Home Office guidance;
- Colleagues are issued with a written contract of employment that complies with all applicable employment laws including regarding wages, benefits, working hours, minimum wage levels and no unauthorised deductions;
- Our contracts of employment contain reasonable notice provisions to allow our colleagues to terminate their employment with us, should they wish to do so;
- Colleagues are paid by bank transfer to their nominated bank accounts, thus minimising the risk of Modern Slavery;
- We salary benchmark against like-for-like roles within our industry;
- We are exploring initiatives to improve inclusive recruitment, including trials to guarantee interviews for disabled candidates who meet minimum criteria, and partnerships to support more disabled colleagues into employment;
- Colleagues are free to join trade unions and Moto regularly engages with USDAW when agreeing pay levels and terms of employment; and
- Our recruitment team follows firm and documented processes and only uses vetted reputable recruitment agencies to ensure the potential for Modern Slavery is reduced as far as possible.

### **Wellbeing at Moto**

- We aim to create a culture of wellbeing by educating and supporting colleagues, as well as creating an environment where they feel safe and valued;
- We have a wellbeing focus group 'A Better You' which meets regularly to discuss and implement wellbeing strategies and initiatives within Moto. The group also delivers webinars on sensitive topics such as silent carers, adoption and coercive/abusive relationships, suicide awareness, baby loss awareness and eating disorders to normalise and create an open channel of discussion for our colleagues on these sensitive topics;
- We have a Wellbeing Hub which gives all colleagues instant access to support in financial, social, physical and mental aspects of wellbeing;

- We provide “Wellbeing Champion” training covering financial, physical, mental, and social wellbeing to all leaders and nominated colleagues. We currently have c.600 trained Wellbeing Champions within Moto and are aiming to have 1000 trained by 2027;
- We have introduced neurodiversity awareness workshops to upskill leaders in recognising and supporting different needs across our workforce, helping to create a more inclusive and supportive environment;
- We encourage leaders to meet regularly with their teams, not only to review their performance, but to also build trust and support their wellbeing;
- We regularly remind colleagues of our Whistleblowing Policy which encourages colleagues to “Speak Up” if they have concerns, including in relation to Modern Slavery;
- We are further enhancing our people data and insight through the development of a People Dashboard, providing improved visibility of workforce demographics and helping us better understand and support our colleague population;
- We conduct an annual “Have Your Say” survey to gauge colleague happiness levels across the business and act, based on the feedback, to create a winning culture and great place to work; and
- We regularly review occupational health and safety risks to try and minimise work-related risks that could lead to mental or physical injury or ill-health.

### **Performance Indicators**

We use the following key performance indicators to measure how effective we have been to ensure that Modern Slavery is not occurring in any part of our business or supply chains:

- The percentage of colleagues who have completed Right to Work in the UK documentation;
- The percentage of nominated suppliers who have agreed to comply with our Supplier Code of Conduct (or equivalent terms); and
- The number of whistleblowing reports that have been received indicating Modern Slavery practices. These are recorded on a register and reported to the Risk & Audit Committee, with learning points cascaded.

Our labour and human rights policies and practices are assessed as part of our overall ESG strategy by an independent provider of business sustainability ratings (EcoVadis).

### **Training**

Our colleagues complete a range of e-learning modules as part of their onboarding when they join the business. Depending on their role, this includes training on how to conduct Right to Work in the UK checks, training on safety, health and wellbeing and diversity and

inclusion, we are working on updating these modules to enhance them from a modern slavery perspective. This training instils in our colleagues the values of diversity, equity, and inclusion, condemns harassment and discrimination, and provides guidance around a multitude of ethics and compliance issues. Additionally, we are enhancing our colleague safety training to further improve awareness, understanding of risk, and confidence in role-based responsibilities, supporting a strong and proactive safety culture across our sites. Alongside this we have been working in partnership with policing authorities to deliver training and guidance to key colleagues on spotting signs of modern slavery externally.

### **Ongoing Development**

In 2026/7, we will build on this by:

- Continuing our supply-chain mapping to determine the location of our Tier 1 suppliers and their risk profiles in terms of supplying products and/or services and implementing a process for carrying out such location and risk profile checks for all potential suppliers going forwards. Implementing our new P2P system and the usage of AI tools will accelerate this process over the next 12 months;
- Continue to endeavour to include a "Modern Slavery" and a "right to audit" clause in contracts with our suppliers to enhance risk control and mitigation;
- Delivering relevant colleague training on Modern Slavery risks as part of a wider Code of Business Conduct programme;
- Continue to work on our programme for delivering training and guidance for key colleagues (in partnership with policing authorities) on spotting signs of Modern Slavery externally (as they are uniquely positioned to do this through their dealings with the public at MSAs) and reviewing the potential to deliver this training to all colleagues via e-learning;
- Enhancing CCTV quality and coverage across our estate allowing us to assist policing authorities with their investigations combatting Modern Slavery and human trafficking;
- Enhancing our annual sustainability survey for brand partners and key suppliers to include social indicators, providing greater visibility of human rights related performance; and
- Continuing our supplier due diligence questionnaires and undertaking audits across our first line suppliers in higher risk areas such as EV, Power and Construction. Where a supplier has higher geopolitical risk factors, or there has been a highlighted risk, in person visits and audits will be undertaken.

Notes:

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the actions that Moto Hospitality Limited has taken during the financial

year ended 25 December 2025 to identify and prevent modern slavery risks in our business and supply chains.

This statement was approved by the Operating Board of Moto Hospitality Limited on 30 June 2026 on behalf of all Moto Group Companies.

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*Kennedy McMeikan*  
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**Kennedy McMeikan**

**CEO**