



Burnt Tree Group Limited  
Operating under the Enterprise Flex-E-Rent brand

## **United Kingdom Modern Slavery Act Disclosure Statement – Fiscal Year 2018**

### **Introduction**

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Pursuant to the United Kingdom Modern Slavery Act of October 2015, Burnt Tree Group Limited (BT) has prepared this statement to detail actions taken to understand potential forced labour and human trafficking risks related to our business and supplier network, and to document the steps taken to mitigate any such risk. This statement relates to actions and activities during fiscal year August 1, 2017 – July 31, 2018.

### **Company Structure**

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BT, an indirect subsidiary of Enterprise Holdings, Inc., together with its affiliates and subsidiaries (“Enterprise Holdings”), is a global transportation provider which, through a network of subsidiaries and independent franchisees, operates the Enterprise Rent-A-Car, National Car Rental, Alamo Rent a Car, Enterprise Car Club, and Enterprise Flex-E-Rent brands. Together with its affiliate, Enterprise Fleet Management, Enterprise Holdings offers car rental and car-sharing services, truck rental, ride sharing, corporate fleet management and retail car sales. As a total mobility provider, Enterprise Holdings serves the needs of a wide variety of businesses, consumers, and organizations. BT offers flexible rental programs for commercial vehicles in the U.K., mainly to business customers. Principal elements of BT’s supplier network are original-equipment vehicle and parts manufacturers, after-market vehicle parts suppliers, and electronic equipment manufacturers. To a limited extent, contract labour constitutes an element of BT’s supplier network.

### **Company Policy**

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BT is committed to maintaining and enhancing processes and systems to ensure that forced labour and human trafficking are not taking place in our business or supplier network. In furtherance of that commitment, and as set forth below, we employ an integrated and comprehensive approach to assessing and mitigating these risks.

### **Forced Labour and Human Trafficking Risk Areas**

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Pursuant to an analysis conducted by Enterprise Holdings, Inc., of exposure to industries, geographic regions, labour forces and products in which forced labour and human trafficking are known to occur, we continue to assess the risk to the BT business to be minimal. Within Enterprise Holdings’ global supplier network, we believe there remains potential risk in the following areas: extraction of metal used in vehicles purchased from original-equipment manufacturers and equipment purchased from after-market suppliers; extraction of rubber in tires used in our rental and leasing fleets; extraction of metal and minerals used in electronic equipment such as computers, tablets and telephones, and assembly of same; manufacture of employee uniforms, use of independent contractors for car washing and logistics; and the harvesting of coffee purchased and provided to employees and customers.

## Due Diligence and Risk Mitigation Programme

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Enterprise Holdings, Inc., utilizes a variety of means to execute on its anti-forced labour and human trafficking commitment. BT has adopted and supports all of these means within our own business.

### **Awareness**

The commitment begins with awareness of our anti-forced labour and human trafficking stance—awareness among employees, customers and business partners, and suppliers:

- **Employee Code of Conduct** – BT has adopted the Enterprise Holdings [Employee Code of Conduct](#). It contains explicit language regarding our anti-forced labour and human trafficking position. The Code was issued to and acknowledged by all employees and accompanied by an interactive training module. The Code is posted on Enterprise Holdings' website, allowing access to the general public, our customers, and business partners.
- **Supplier Code of Conduct** – BT issued Enterprise Holdings' [Supplier Code of Conduct](#) in 2016 across its supplier network, which contains anti-forced labour and human trafficking language mirroring that found in the Employee Code of Conduct. In this way, each of BT's suppliers is affirmatively advised of our position and expectation that our suppliers comply with such principles. New suppliers are provided the Supplier Code of Conduct during the on-boarding process.

### **Risk Assessment and Investigation**

As noted above, in work towards preparation of the inaugural 2016 disclosure statement, potential forced labour and human trafficking supplier-network risk was identified by Enterprise Holdings, Inc., in the following areas, all of which apply to BT: extraction of metal used in vehicles purchased from original-equipment manufacturers and equipment purchased from after-market suppliers; extraction of rubber used in vehicle tires; extraction of metal and minerals used in electronic equipment, and assembly of same; manufacture of employee uniforms, use of independent contractors for car washing and logistics; and the harvesting of coffee provided to employees and customers. *Actual* risk in these areas was assessed by the following means in 2016, and followed-up on in subsequent years, as set forth below:

- **Supplier Policy and Practices Review**
  - **Original equipment manufacturers and after-market equipment suppliers**
    - Review conducted of published human rights and working conditions statements for all original equipment manufacturer suppliers to Enterprise Holdings. All were found to have strong anti-forced labour and human trafficking positions, as well as detailed assessment, avoidance and mitigation plans, addressing both the sourcing of raw materials and assembly of products.
    - Review conducted of published human rights and working conditions statements for after-market equipment suppliers. As many were smaller in size, few maintained websites or published statements. Suppliers with material sales to Enterprise Holdings were identified in 2016 for follow-up inquiry. Responses were received from all

suppliers, with most asserting the operation of business free of forced labour and human trafficking, as well as the presence of controls designed to mitigate supply chain risk. A small number of suppliers acknowledged a need to implement additional controls to mitigate supply chain risk. Follow-up inquiry to ensure all suppliers have placed appropriate controls within their supply chains will continue.

○ **Vehicle tire manufacturers**

- Review conducted of published human rights and working conditions policies and statements for all major vehicle tire manufacturers. The vast majority were found to have strong anti-forced labour and human trafficking positions, as well as detailed assessment, avoidance and mitigation plans, addressing the sourcing of rubber. For those without statements, but with sales to original equipment manufacturers only, the statements of the original equipment manufacturers were viewed as “covering” the supplier. Remaining manufacturers without statements were determined not to have sales to Enterprise Holdings.

○ **Electronic equipment manufacturers**

- Review conducted of published human rights and working conditions statements for all major electronic equipment manufacturers, as well as the statements of specific Enterprise Holdings’ suppliers. The vast majority were found to have strong anti-forced labour and human trafficking positions, as well as detailed assessment, avoidance and mitigation plans, addressing both the sourcing of raw materials and assembly of products. In recognition of the known risk of the use of forced labour in the extraction of minerals (“3T & G” – tungsten, tantalum, tin and gold) used in electronic equipment, suppliers without published statements were identified in 2016 for follow-up inquiry. Inquiry responses indicated that suppliers do not have forced labour and human trafficking issues within their businesses and have controls in place to mitigate risks in their supply chains.

○ **Employee uniform manufacturers**

- Review conducted of published human rights and working conditions statements, where available, for all suppliers of uniforms to Enterprise Holdings. Most suppliers were found to have strong anti-forced labour and human trafficking positions, as well as detailed assessment, avoidance and mitigation plans, addressing the assembly of products. Suppliers without published statements were identified in 2016 for follow-up inquiry. Inquiry responses indicated that suppliers do not have forced labour and human trafficking issues within their businesses and have controls in place to mitigate risks in their supply chains.

○ **Car washing and logistics contractors**

- Review conducted of contracts held with U.S- based car washing and logistics staffing services, and presence of terms requiring compliance with federal and state employment and immigration law verified. Staffing services in the United Kingdom and Europe were identified in

2016 for contract review and follow-up inquiry. Inquiry responses indicated that suppliers do not have forced labour and human trafficking issues within their businesses and have controls in place to mitigate risks in their supply chains.

- **Coffee distributors**

- Review of Enterprise Holdings' coffee suppliers' websites revealed that none published human rights and working conditions statements. In recognition of the known risk of the use of forced labour in the harvesting of coffee, all suppliers were identified in 2016 for follow-up inquiry. Inquiry responses indicated that most suppliers do not have strong controls in place to ensure that working conditions in their supply chain are appropriate. Additional discussion was held with the largest coffee supplier to Corporate headquarters during 2017 and 2018. Coming out of this discussion was a decision to switch coffee suppliers. The coffee now supplied at Corporate Headquarters in the United States and Europe is either Fairtrade or Rainforest Alliance certified.

- **Supplier Questionnaires** – As noted above, where evidence of anti-forced labour and human trafficking policies and practices could not be established through review of published materials, suppliers were sent questionnaires inquiring about their practices, and their responses, thereafter assessed for follow-up action.

### **Assurance**

- **Supplier Interview and Follow-Up** – Responses to supplier inquiries has been and will be assessed for risk and follow-up investigation as appropriate.
- **Contracts and Agreements** – BT has developed standard contract language regarding the prohibition of forced labour and human trafficking and is including it in its contracts with suppliers of goods and services based on risk.
- **Reporting Mechanism** – BT utilizes a third-party-administered hotline to allow for anonymous reporting of ethics and compliance concerns. In 2016, we modified the hotline web portal to facilitate such reporting not only from employees, but from customers, suppliers and business partners as well. To afford greater visibility to the forced labour and human trafficking issue, a standalone “Forced Labour and Human Trafficking” issue type was added to the list of matters for which reports can be submitted. The availability of the hotline was made known to our suppliers by way of reference in the Supplier Code of Conduct.

### **Training**

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As noted above, BT issued Code of Conduct training to employees this fiscal year. This comprehensive course presented and tested knowledge of the company's anti-forced labour and human trafficking policy and practices.

### **Conclusion**

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BT fully continues to fully support the principles underlying the United Kingdom Modern Slavery Act and remains committed to the operation of a business—both directly and

through our supplier network—free from the presence of forced labour and human trafficking. While to date, we have found no direct evidence of forced labour and human trafficking activity or risk in our business or supplier network, as noted in this and the 2016 statement, several areas of inquiry with suppliers remain open and will be followed through to conclusion. Going forward, leveraging the progress made over the past three years, we will continue to drive awareness of our anti-forced labour and human trafficking position with employees, suppliers, business partners and customers; examine our business and supplier network for risk; and aggressively respond to and address risk or evidence of forced labour or human trafficking.

Adopted on behalf of Burnt Tree Group Limited.

A handwritten signature in black ink, appearing to read "Rick Short". The signature is stylized and cursive, with a prominent horizontal stroke at the end.

Rick Short  
Director