

Modern Slavery Statement for the Financial Year ended 31 March 2022

This statement is made and published in accordance with section 13 of the Commonwealth Modern Slavery Act 2018, it sets out the risks and actions taken by Summit Auto Lease Australia Pty Ltd ABN 87 054 704 737 (SALA).

Group Structure

SALA was established on December 20th, 1996 and is a subsidiary company of Sumitomo Mitsui Auto Service Company Ltd (SMAS) incorporated in Japan.

It trades under the business name Summit Fleet Leasing and Management and its head office is at Unit 7, 36-48 South Street, Rydalmere NSW.

SMAS shareholders are

- Sumitomo Corporation,
- Sumitomo Mitsui Financial Group Inc.,
- Sumitomo Mitsui Finance and Leasing Co Ltd, and

At the core of SMAS lies the Company's Business Philosophy. The Corporate Mission Statement is based on this philosophy and represents SMAS fundamental and ultimate value standard stating an "utmost respect for the individual" and placing a prime importance on integrity and sound management.

As a subsidiary company of SMAS, SALA shares its parent company's core values and abides by them through its governance, policies and procedures.

SALA's Business

SALA operates nationally with physical offices in New South Wales, Queensland, Victoria and Western Australia, without international presence, does not own or control any other entities and has 72 employees.

SALA is a provider of:

- Operating Leases, Finance Leases, Chattel Mortgage and Fleet Management Services for passenger, light commercial and heavy commercial vehicles dealing with small business, corporate and Government clients; and
- Novated leases to individuals for motor vehicles; and
- Insurance products relating to novated leases; and
- Comprehensive car insurance for small business, corporate and Government clients; and
- Vehicle sales for passenger, light commercial and heavy commercial vehicles.

SALA's stance on Modern Slavery and Human Trafficking

SALA supports the principles of the Commonwealth Modern Slavery Act 2018 in the areas of Human Rights, labour standards, environment and anti-corruption measures.

SALA believes that it has an ethical responsibility to promote human rights by showing respect for human rights through its own behaviour, and by sharing this ethos with its customers.

SALA recognises the complexity of Modern Slavery risk, and in particular the variety of ways in which it can manifest in operations and supply chains. SALA is committed to maintaining and improving systems and processes to mitigate the risk that it might be involved, wittingly or unwittingly, in the commission of Modern Slavery and Human trafficking in any part of its operations, customers and supply chain (including contractors and suppliers), products, services and staff activities.

SALA expects its staff, suppliers and business partners to adhere to similar high standards and to take reasonable steps to ensure that other third parties they do business with adhere to similar standards.

Supply Chain

Our supplier base contains a mixture of short term and longer-term business relationships. Our longer-term business relationships are predominantly subject to written contracts, however, we transact with a number of suppliers on an ad hoc basis.

In the year ended 31st March 2022, SALA spent approximately \$235.6 million purchasing goods and services, with the majority of the suppliers located in Australia, whilst some IT support procured from suppliers located in Belgium, Singapore, USA, and UK . We also procure motor vehicles and fuel from domestic suppliers with operations located internationally.

SALA takes a collaborative approach to our relationship with our supply chain and encourages transparency by encouraging whistleblowers to report instances of unethical, unlawful or undesirable conduct in accordance with the Whistleblower Policy of SALA. Should issues be reported as a result of our due diligence, we will give guidance and support to our suppliers and contractors to help identify and work through an appropriate resolution.

In the case of repeated or serious instances, we will give consideration to the termination of our relationship accordingly.

Our supply chains include

- Manufacturers, distributors and repairers of automobile and other vehicle supplies; and
- Third party contractors providing equipment; and
- Consultancy and personnel as part of the sale and operational process; and
- Third party contractors providing services to SALA on request in relation to its business activities; and
- Provision of daily rental vehicles; and
- In-life movement of vehicles; and
- Roadside emergency breakdown services; and
- Accident management services; and
- Aftermarket products such as fitting out of commercial vehicles, roof rails, tinting, rustproofing etc.

Risks of modern slavery

We strive to do business with suppliers who demonstrate ethical business practices and values, including in relation to human rights. The risk that modern slavery is present in our supply chain is assessed in a focussed, collaborative manner by relevant internal stakeholders across our Legal, Risk, Procurement and Operations teams. In seeking to identify the modern slavery risks in our operations and supply chain, we considered the potential for our business to cause, contribute to, or be directly linked to modern slavery. In doing so, we looked at;

- The risk that our operation may directly result in modern slavery practices; and
- The risk that our operations and/or actions in our supply chains contribute to modern slavery; and
- The risk that our operations, products or services are connected to modern slavery through the activities of another entity, including business partners.

Having regard to this assessment process, given the fact that our operations are based in Australia, our geographic risk remains low according to the Global Slavery Index. Furthermore, the risk of modern slavery occurring in our direct employment of workers also remains low having regard to our ongoing compliance with the legal framework regulating employment practices in Australia. For these reasons, we are of the view that there are low risks that our operations have caused or contributed to modern slavery risks during the Reporting Period.

However, the location of our business does not completely remove the risk of modern slavery from our supply chains. We are conscious that our direct suppliers in Australia may have operations and downstream suppliers in countries where modern slavery practices are more prevalent, including those suppliers who manufacture goods with raw materials sourced from high-risk countries. For example, it is widely reported that some motor vehicle and information technology infrastructure manufacturers rely on their suppliers to source high-risk products such as minerals and other raw materials from countries with an increased risk profile for child or forced labour in order to produce components fitted into their products. This means that, by virtue of our supply chain, we are at risk of being directly lined to modern slavery through the business practices of companies in the later tiers of our supply chain.

Existing Measure in Place to Assess and Address Modern Slavery Risks

In our operations

SALA conducts its business in accordance with various policies, including the following which address human rights and ethical employment practices;

- Discrimination, Harassment, Bullying & Grievance Policy
- Modern Slavery Policy
- Speak Up SALA Policy
- Whistleblower Policy

SALA also has a number of policies that set out in a transparent manner our employees' rights to remuneration and a safe working environment. These policies include;

- Disciplinary Policy
- Leave Policy
- Occupational Health & Safety Policy
- Performance Appraisal Policy & Procedure
- Recruitment Policy & Procedure
- Rehabilitation Policy & Procedure
- Working from Home Policy

A professional training module on Modern Slavery is included in the learning management system, which all employees and contractors of SALA must complete annually on Modern Slavery and Human Trafficking and the requirements of the Modern Slavery Act 2018.

In our supply chain

During the year ended 31 March 2022, SALA updated its Supply and Services Agreement to include a Modern Slavery clause for all its suppliers which is being adopted for all new suppliers and gradually implemented and executed with all pre-existing suppliers

Also during the year ended 31 March 2022 we surveyed over 260 suppliers within our supply chain to collect information on our suppliers' operations and their inherent modern slavery risks and governance practices, representing 50% of the direct suppliers spend of SALA.

The suppliers who responded to the due diligence questionnaire demonstrated varying levels of maturity in their approach to identifying, preventing and managing modern slavery risks in their operations and supply chain.

Due to the limited scope of suppliers engaged, we note that for 2022, our intention is to extend the scope of our Modern Slavery Due Diligence Questionnaire to suppliers outside the top 50% of total spend and those who are in the second tier of our supply chain.

Remediation

Our Whistleblower Policy sets out the mechanisms by which our employees can raise grievances. The policy includes protections for the whistleblower's confidentiality, as well as preventing their victimisation. No complaints related to modern slavery were reported via our whistleblower channels during the Reporting Period.

If our investigative processes determine an issue of non-compliance with our policies by one of our suppliers, we will endeavour to have our supplier identify and correct those issues. If it is apparent that an individual has suffered harm as a result of such issue, we will seek to ensure that they are 'made good' by leveraging our position with our supplier.

If a supplier fails to make progress in respect of required remediation, we may subject it to review and sanctions by leveraging our position with them, including the potential termination of our relationship.

We remain committed to providing effective remedies where our operations cause or contribute to adverse human rights impacts. Our approach to remediation is to engage directly with affected persons, and work with our business partners and other stakeholders to remediate any such impacts and consider how our internal processes can be improved to prevent similar impacts in the future.

Effectiveness

The effectiveness of SALA's management of its modern slavery risk can be evaluated through the number of actual or potential modern slavery issues identified by employees, management or the public in SALA's operations and supply chain, as well as SALA industry peers.

SALA did not identify any such issues in its operations or supply chain during the year ended 31 March 2022 independently or through the company's due diligence procedures, nor has it received any notification of such issues within its own business or those of its industry peers. Consistent with SALA's assessment of its own modern slavery risk and due diligence procedures employed by SALA, identified its key suppliers as having a low risk of modern slavery within its operations. It is acknowledged, however, the SALA operations, and those of its primary suppliers, take place within Australia and have a low incidence of modern slavery generally.

Further steps

Whilst we are confident that we operate in a relatively low risk business sector and our management and processes minimise the risk of modern slavery or human trafficking occurring, we are committed to further improvements and will continue to review and enhance our approach to addressing human rights risks by taking further steps in Fiscal Year 2022 which may include:

- Continue to consider and assess SALA's suppliers and their modern slavery risk, especially when commencing new operations in a new area or when engaging new key suppliers; and
- Ensuring that modern slavery compliance clauses are incorporated into existing supplier contracts which come up for renewal; and
- Seek to improve the Modern Slavery Due Diligence Questionnaire completion rate year on year; and
- Undertaking any other measures which are appropriate to address SALA's modern slavery risks.

Consultation Process

As described above, SALA does not own or control other reporting entities. No consultation process was required.

Approval

This statement is approved by the Board of Directors on 29th September 2022 and signed by the President of SALA.



Kenji Mamiya