



## **Modern Slavery Statement for the financial year ending 30 June 2021**

This statement is made pursuant to the Commonwealth Modern Slavery Act 2018. It sets out the steps that Hertz Australia Pty Limited (ACN 004 407 087) (referred to here as “we”), have taken to address the risk of slavery and human trafficking taking place in their operations and supply chains.

### **INTRODUCTION**

---

The Hertz Group has a long tradition of success in the rental car industry. We are passionate competitors and are always in search of new means for growing our business and returning value to our stakeholders. That passion and competitive drive have been major factors in our success despite intense pressures in the industries we serve and the significant impact of Covid-19. In responding to these pressures however, we are committed to acting ethically at all times. Every member of the Hertz group is expected to conduct their business with integrity and maintain the set of standards detailed in the company’s Standard of Business Conduct. Hertz recognises that a vital component of being a good corporate citizen is to treat everyone in our supply chain with the dignity and respect they deserve.

### **PRINCIPLES**

---

We do not tolerate any form of modern slavery and human trafficking in any area of our business or supply chain.

We expect the same zero tolerance approach to any form of modern slavery from our business partners. If any of our business partners are found to be engaging in slavery or other unethical working practices, we will take steps to address those issues with them, seek to drive improved standards and, if necessary, terminate the business relationship.

We are committed to tackling instances of modern slavery through effective risk assessment and third-party due diligence. We are also committed to raise our employees’ awareness in order to identify instances of modern slavery and collaborating with them and other stakeholders to achieve best practice.

### **OUR ORGANISATION**

---

#### **Organisational structure**

Hertz Australia Pty Ltd is incorporated in Australia and is a wholly owned subsidiary of The Hertz Corporation, and our ultimate parent company is Hertz Global Holdings Inc which has its head office in Estero, Florida, USA.

As of December 31, 2020, The Hertz Corporation employed approximately 24,000 employees worldwide, consisting of 17,000 employees in the U.S. and 7,000 employees in its international operations.

Internationally, we do business in approximately 160 countries and regions through company-operated rental locations as well as through our partners or franchisees to whom we have licensed use of our brands. This represents approximately 8,100 corporate and franchisee locations, comprised of 2,000 airport and 6,100 off airport locations.

## **Australian Business**

- In Australia we are a provider of vehicles for hire, operating through the Hertz, Ace and Firefly brands. We offer various ways to rent a car or a van:
  - Flexicar – short-term, hourly rental of technology enabled vehicles positioned on street parking or corporate customer locations
  - Hertz, Ace and Firefly – car or van rental from short-term to long-term rental; and
  - Through our multiple brand portfolio we are able to provide customers a full range of rental services at different price points, levels of service, offerings and products.
- We currently employ over 1,000 employees at over 55 company owned and operated locations across Australia.
- We dispose of vehicles through non-retail disposition channels such as auctions, brokered sales, sales to wholesalers and sales to dealers.
- We also have a network of franchisees and agencies providing vehicle rental services throughout Australia.
- We have consulted with all relevant companies we own or control in the development of this statement. These entities are:
  - Ace Rental Cars Pty Ltd
  - HA Fleet Pty Ltd
  - HA Lease Pty Ltd
  - Hertz Asia Pacific Pty Ltd

- **Business units**

Our business is organised into a number of business units ranging from operations, through to specialist “centres of excellence” such as Sales, Fleet and Procurement.

## **OUR SUPPLY CHAINS**

---

Our supply chains include fleet related suppliers such as vehicle manufacturers and fuel providers and suppliers of non-fleet goods and services such as utilities and professional services

We rely on all of these suppliers to provide a seamless structure for our business. Although we use our own employees to provide the vast majority of our services, we also use the services of contractors to provide certain services such as for the cleaning and preparation of our vehicles for hire. Some of our contractors may subcontract some services that are ultimately provided to Hertz and this has been identified as a risk factor for the potential for modern slavery to occur.

We do not have complete visibility of the entire supply chain for the vehicles that we purchase, so there may be the potential for modern slavery to occur deeper in our fleet supply chain, such as parts of the supply chain that are involved in the extraction of the raw materials for key commodities that form part of the finished vehicles. This risk also applies to the spare and

replacement parts that are sourced from the vehicle manufacturers and then supplied to Hertz via other third parties in our maintenance supply chain.

As end users of finished products, our visibility across the non-fleet supply chain is also limited however we have identified our procurement of office consumables and uniforms as potential risk areas for modern slavery. This is as the provenance of many of the inputs to these finished goods is often not ascertained or clear.

## **POLICIES AND PROCEDURES**

---

### **Code of Conduct**

We maintain a Standards of Business Conduct (referred to here as “Code of Conduct”) which is applicable to all personnel working for and on behalf of Hertz globally. It obliges all employees to act ethically and in accordance with the law, including the Modern Slavery Act 2018 and all applicable labour laws. In particular, it states that:

- We have a responsibility to uphold human rights and stand firmly against human trafficking and forced or coerced labour.
- We follow all child labour laws and support the elimination of unlawful child labour and exploitation.
- We provide fair working conditions, wages, and benefits that meet or exceed applicable laws and local requirements, as well as a safe and healthy workplace for everyone we work with.

We require all employees to certify adherence to the highest standards of ethical business practices. The Code of Conduct is required to be acknowledged by all employees on an annual basis.

Our Code of Conduct is publicly available on Hertz Corporation’s website, and is accessible by our suppliers, business partners and customers. It can be found at the following link: [https://www.hertz.com/rentacar/misc/index.jsp?targetPage=Hertz\\_Sustainability.jsp](https://www.hertz.com/rentacar/misc/index.jsp?targetPage=Hertz_Sustainability.jsp)

### **Global Human Rights Policy Statement**

We launched our Global Human Rights Policy Statement globally on December 10, 2020, to celebrate Human Rights Day. The Policy applies to all Hertz operations globally and to all Hertz employees at all levels, officers and directors.

The Policy outlines our commitment to respecting and defending Human Rights. It means that Hertz will:

- Comply with applicable national laws and international instruments setting out Human Rights standards;
- Prevent, detect and investigate possible violations of Human Rights within our business; and
- Remediate and, if necessary, punish any breach of this policy.

With regards to third parties, our commitment also means that Hertz:

- Expect the third parties we work with to have the same zero tolerance approach towards Human Rights violations;
- Will not support or deal with any business knowingly and intentionally involved in Human Rights violations;
- Will investigate any potential violation of Human Rights within our supply chain;
- Based on the results of the investigation, may take remediation measures or, if necessary, impose adverse consequences and may also report the incident to the

appropriate authorities.

Our Global Human Rights Policy Statement is publicly available on Hertz Corporation's website and is accessible by our employees, suppliers, business partners and customers. It can be found at the following link: <https://images.hertz.com/pdfs/820052-Global-Human-Rights-Policy.pdf>

### **Anti-Modern Slavery Policy**

We adopted an Anti-Modern Slavery Policy (referred to as "Policy") which is applicable to all employees in the UK and Australia at all levels, officers and directors, as well as contractors, agency workers and temporary staff. This policy can be read in conjunction with our Global Human Rights Policy Statement.

The Policy reflects our commitment to promote and uphold human rights and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

### **Global Supplier Code of Conduct**

We recently adopted a Global Supplier Code of Conduct which applies to all of Hertz's suppliers, business partners, consultants, contractors, subcontractors and their affiliates and applies to all products and services that Hertz purchases. It outlines our expectations, standards and guidelines for how we can mutually benefit from a commitment to ethics and integrity. With regards to fair working conditions and human rights, the Code states that:

- Suppliers are required to follow all applicable laws and regulations regarding wages, hours, overtime, worker's compensation, and other mandated benefits.
- Suppliers have a responsibility to uphold human rights and stand firmly against human trafficking and forced or coerced labour.
- Suppliers should abide by all child labour laws and support the elimination of unlawful child labour and exploitation.
- Hertz expects its suppliers to develop and implement policies and procedures to ensure respect of all human rights in their businesses and supply chain.

Our Global Supplier Code of Conduct is publicly available on Hertz Corporation's website and is accessible by our suppliers. It can be found at the following link: <https://images.hertz.com/pdfs/supplier-code-conduct.pdf>

### **Global Brand Partner Code of Conduct**

Our Brand Partners – including our franchisees, sub-franchisees, licences, sub-licenses and agents – are expected to adhere to the same principles as Hertz and to enforce them within their own businesses. When it comes to fair working conditions and human rights, the Global Brand Partner Code of Conduct contains the same language as the Global Supplier Code of Conduct described above.

### **Other policies and procedures**

We maintain policies and procedures to encourage employees to report concerns and seek guidance, using confidential and anonymous methods. If employees identify any potential signs of slavery, human trafficking or other human rights abuses, they have several channels available to report this, including the Compliance, Legal and HR Departments as well as the Compliance Hotline which is a third-party service. So far, we did not receive any report of suspected modern slavery or human trafficking within our Australian business.

Finally, we maintain policies and procedures to protect employees from retaliation if they make a good faith report.

### **Training**

The Code of Conduct E-learning reiterates our commitment in uploading fair working conditions and reminds employees' responsibility to be alert for any sign of forced or coerced labour.

We also provided training materials on Human Rights to our employees globally when launching our Global Human Rights Policy Statement.

### **Human Rights Impact Assessment**

We are undertaking a deep assessment to identify, manage and mitigate potential and/or existing risks of slavery and human trafficking within our operations and supply chains.

## **CONTROLS AND MEASURES FOR OUR SUPPLY CHAIN**

---

We comply with all local laws and regulations and require the same legal and ethical standards from our business partners, including suppliers, agents, contractors and franchisees. This helps ensure our continued success, excellence and integrity. We aim to follow best practices to ensure that suppliers and contractors act in accordance with the law. Measures include the following:

### **Contractual obligations**

We provide anti-slavery and human rights obligations in our contracts with our business partners, which include the obligation to comply with all laws.

### **Due diligence processes**

We perform initial and ongoing vetting of high risk suppliers and franchisees to establish their compliance with applicable modern slavery legislation and their commitment and efficiency to tackle these issues.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we encourage our suppliers, contractors and franchisees to provide training to their employees. We will emphasise these requirements particularly in "high risk" countries to increase their awareness of these requirements related to forced labour, child labour and human trafficking.

### **Investigations**

We have a well-established global reporting of compliance incidents. When identified, those incidents, which include any suspected instances of modern slavery, are thoroughly investigated, sanctioned when appropriate and relevant follow-up actions are taken. If those incidents involve a business partner, we expect a full cooperation (e.g. access to relevant information, adoption of remedial actions when appropriate etc.).

## **NEXT STEPS**

---

Our approach, Code of Conduct and Policies are clear on the need to protect human rights. Over the coming years, we will continue to determine how we can obtain further comfort over the effectiveness of existing anti-slavery and human trafficking measures.

We will also continue to develop our programme, and we have already identified the following measures:

- Review and update the compliance training offered to all employees
- Identify key suppliers to engage for further investigation into their approach to eliminating modern slavery.

This statement was approved by the directors of Hertz Australia Pty Ltd on 25 March 2022.

DocuSigned by:  
  
CC988E29B339415...  
**Eoin MacNeill**  
Managing Director

DocuSigned by:  
  
96B81C75B41A4B5...  
**Mark Righton**  
Director