

**BREDE MANAGEMENT CONSULTANTS PTY LTD**

**Modern Slavery Statement 2021**

## Our Entities

Brede Management Consultants Pty Ltd (ABN 78 008 551 264) is the controlling entity of the trading entities listed below, collectively called “the Group”.

1. Bacova Holdings Pty Ltd trading as National Capital Motors.
2. Goulburn Motor Investments Pty Ltd ATF Goulburn Motors Unit Trust trading as Goulburn Country Motors.
3. Greenway Motor Company Pty Ltd ATF Scollay Motors Unit Trust trading as National Capital Toyota.
4. Bega Automotive Pty Ltd ANF BEGADP Pty Ltd and BVM Company Pty Ltd trading as Bega Valley Motors.
5. BMC Development Company Pty Ltd ATF Yass Road Unit Trust trading as Jayco Canberra.

The Group’s mission is to be a values-driven Automotive group. Our values should be referred to at all times, and our values drive our behaviour towards our guests, peers and ourselves.

The Group’s values are depicted in the below diagram:



## Our Structure, Operations and Supply Chains

The Group is a family-owned motor vehicle group, with operations in the Australian Capital Territory and regional New South Wales.

The Group employs over 250 employees across 7 dealership sites in Canberra, Goulburn, Bega and Queanbeyan.

The main business activities are the sale of motor vehicles and caravans, parts and servicing for 12 motor vehicle franchises.



The majority of the Group's supply chains are suppliers located in Australia. Overseas suppliers are mainly the Original Equipment Manufacturers.

## Risks of Modern Slavery Practices in Our Operations and Supply Chains

The Group depends on a large network of third parties to provide goods and services to keep our dealerships running. These include motor vehicle suppliers, parts suppliers, freight/transport services, fleet management organisations, finance providers, vehicle repairers, advertising companies, marketing consultants, professional services, cleaning services, uniform laundry services, site security services, waste removal services, and tradespeople.

Within our operations, the Group considers the risks of modern slavery practices to be low because all our operations are based in Australia, and the Group takes utmost steps in ensuring compliance with Australian law and regulations.

The Group acknowledges that it is not easy to review the risks of modern slavery practices in our supply chains due to the large number of suppliers involved and the overseas locations of some of the suppliers. However, with the availability of our larger suppliers' Modern Slavery Statements on the Australian Border Force's Modern Slavery Register, the Group will be able to commence reviewing and assessing these risks.

## Our Actions to Assess and Address the Modern Slavery Risks

The Group is committed to ensuring our employees' rights are respected and remunerated fairly, and our workplaces are safe.

Our existing induction process for new employees includes going through and providing a copy of our comprehensive *Company Policy Manual for Induction* which covers our policies on:

- No access to the workplace after normal working hours
- Workplace health & safety
- Bullying and harassment prevention together with grievance handling procedure
- Manual handling assessment and control
- No smoking, alcohol and/or drug use in the workplace
- Diversity, inclusion and equal opportunity from hiring process to integrating diversity into the workplace.

The Group ensures that our employees' remuneration and entitlements are in accordance with the Vehicle Repair, Services and Retail Award 2020, Clerks – Private Sector Award 2020, and the National Employment Standards.

In terms of supplier selections, the Group's preference is to deal with local suppliers as much as possible.

The Group is committed to continuous improvement and will continue to fine tune its policies and procedures as we review and identify risks across our operations and supply chains.

## Assessing the Effectiveness of Our Actions

In order to assess the effectiveness of our actions, the Group will develop the following Modern Slavery Key Performance Indicators (KPIs) to help measure our response to modern slavery:

- Proportion or number of complaints resolved by a grievance mechanism
- Number of supplier contracts that include modern slavery clauses

The Group will also review our broader and existing KPIs in terms of supplier selections to ensure we do not inadvertently contribute to modern slavery risks.

## Consultation with Our Entities

The Group is controlled by the same parent entity and by the same majority directors. The Group is therefore under the same direction in terms of compliance with the Group policies and minimisation of modern slavery risks.

## Other Relevant Information

The Group is a member of the Motor Traders Association of NSW and the Australian Automotive Dealer Council. The Group will seek assistance from these industry associations where necessary to develop best practice principles to identify and minimise modern slavery risks.

## Principal Governing Body Approval

This modern slavery statement was approved by the Board of Brede Management Consultants Pty Ltd as the controlling entity of the Group on 10 December 2021.

Signed by



**Campbell Brede**  
**Chairman**