



**MODERN SLAVERY STATEMENT**  
*COX AUTOMOTIVE*



## THE REPORTING ENTITIES AND THE CONSULTATION PROCESS

Cox Automotive Australia Pty Ltd (ACN 090 535 505) (CAA) is part of Cox Enterprises, a group of leading communications, media and automotive services companies. Cox Automotive group is the world's largest automotive service organisation, with solutions that help dealers, manufacturers, fleet companies and leasing firms add value and improve business performance, we are committed to our vision to transform the way the world buys, sells, owns and uses vehicles. CAA and its subsidiary Manheim Pty Ltd (ACN 089 074 206) (Manheim) are reporting entities under the Modern Slavery Act 2018 (Cth). For the purpose of this Modern Slavery Statement, CAA and Manheim are jointly termed as Cox Australia.

Cox Australia is committed to releasing our Modern Slavery Statement to the Australian Border Force for publication on the central register of statements in the first half of 2021 and will continue to do so on an annual basis to set out the actions undertaken by each entity to identify and address the risk of modern slavery within our business and supply chains.

Cox Australia has taken an integrated approach to addressing modern slavery risks. There has been significant consultation and collaboration between our people to prepare this Statement, including within the Sustainability, People and Culture, Finance, Risk, Legal and Corporate Affairs functions. We have also communicated and explained our commitments and expectations regarding modern slavery more broadly within our business, and we intend to enhance that communication even further in the future. This initiative is in line with one of Cox Australia's values 'Doing the right thing' and supporting the communities our businesses operate in.

## STATEMENT ON PREVENTING MODERN SLAVERY

Modern slavery is a crime which results in the abhorrent abuse of the human rights of vulnerable workers. Cox Australia has a zero-tolerance approach to situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Cox Australia is committed to acting ethically and with integrity and transparency in all its business dealings and relationships. We have implemented effective systems and controls to assess and manage the risks of modern slavery within our business and supply chain.

Cox Australia's supply chain is largely Australian based with a very small number of services purchased from overseas companies. CAA suppliers include service providers within the marketing, information technology, human resources and legal industries. Manheim suppliers include service providers within the transport, mechanical, storage and equipment industries. These providers include local carrier services who service our National Transport team in transporting vehicles and machinery across sites and local mechanics and repairers who service our re-marketing division in assisting with sales on behalf of our customers.

## STRUCTURE

CAA is the sole shareholder of Manheim and is responsible for the governance arrangements for Manheim. CAA manages the finance, human resources, occupational health and safety, marketing, legal and compliance functions of Cox Australia within Australia.

Manheim provides automotive remarketing services within Australia and in conjunction with Manheim Limited in New Zealand. Manheim has working sites in each State and Territory of Australia and shares its head office with CAA in Victoria at 4 Gordon Luck Avenue, Altona North.

## OPERATIONS

CAA owns and operates businesses offering solutions across all pillars of the automotive ecosystem, from inventory management and reconditioning to digital marketing, dealer management systems and after-sales loyalty. CAA owns Dealer Auction, Dealer Solutions, Digipurple, Kelley Blue Book, Manheim and Sell My Car businesses within Australia. CAA focuses on continually improving products to create faster vehicle transactions, enabling consumers to have a seamless online-to-offline experience.

As one of Australia's leading provider of automotive remarketing services, Manheim caters for the needs of a diverse range of industry sectors. We provide comprehensive remarketing solutions for passenger

cars, commercial vehicles, light and heavy trucks, motorcycles, boats and recreational vehicles as well as machinery, plant and equipment. Manheim also provides specialist services to the insurance industry for the remarketing of damaged items from these sectors. Manheim holds weekly trade and public auctions for passenger cars and commercial vehicles, 4WDs and damaged vehicles online and in person, while truck and machinery auctions are held monthly.

## SUPPLY CHAINS

We are committed to obtaining and retaining competitive goods and services whilst also ensuring they are from sources which have not jeopardised human rights, safety or the environment. We aim to develop strong partnerships with our suppliers, based on mutual trust, understanding and respect and shared ethical values.

We expect our suppliers to adhere to business principles consistent with our own: (i) to ensure that their products and services are produced and delivered to comply with all legislation relevant to their business; and (ii) to ensure they adopt and implement acceptable safety, environmental, product quality, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

## RISKS OF MODERN SLAVERY

Cox Australia considers the residual risk of modern slavery in our operation to be low. We understand that modern slavery can happen in any industry and any country and can take any form including trafficking in persons, slavery, servitude, forced marriage, forced labour; debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

Cox Australia has undertaken a business wide review and the following areas of potential risks were identified:

- suppliers who are based overseas, particularly where those businesses may be in countries with less robust human rights legislation than in Australia;
- agency or contractor workers who may be vulnerable to abuse by their employer; and
- general suppliers who may subcontract their services or purchase without ensuring adequate due diligence.

These risks have been included in the Cox Australia Compliance Risk Register. The compliance risks are the threats posed to Cox Australia's financial, organisational, and reputational standing resulting from violations of laws, regulations, codes of conduct or organisational standards of practice. The compliance risks are identified and prioritised by the Cox Australia executive leadership team for controls, policies, and procedures.

We monitor and address human rights issues in our operations under the relevant policies and practices.

## COX AUSTRALIA POLICIES

The Cox Australia Human Resources department has documented policies and guidance covering all aspects of Australian legislation encompassing employment with us CAA Australia and providing employees with clear standards for legal compliance.

Cox Australia has a Supplier Code of Conduct to reflect the same high standards that it expects from its suppliers, contractors and other business partners, including specific prohibitions against the use of modern slavery. The Supplier Code of Conduct is published and available on all CAA businesses' websites. In turn, we expect our suppliers to hold their own supply chains to these high standards.

Cox Australia also has an internal Modern Slavery Policy (Policy) outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Policy provides guidance on support available to Cox Australia employees or agents if they become aware of circumstances where someone is at risk of or affected by modern slavery practices.

## POLICY ON RECRUITMENT, EMPLOYMENT AND HUMAN RIGHTS

Cox Australia will always recruit the best person for the job and will not discriminate based on protected characteristics such as age, disability, gender, gender reassignment, marital or civil partnership, pregnancy and maternity, race, colour, nationality, ethnic origin, religion or belief, and sexual orientation. The CAA Harassment and Bullying Prevention policy is in place to guide the expected ongoing level of behaviour.

Cox Australia is committed to complying with its regulatory duties to ensure that its employees, contractors, visitors, and those for whom it is providing services are able to operate within a safe and healthy work environment.

Cox Australia will adhere to the following principles in respect of our employees:

- We will treat all employees fairly and honestly. All employees will have agreed terms and conditions in accordance with legislation and will be given appropriate skills training.
- We will pay a fair wage reflecting market conditions and will always meet any national minimum wage.
- Working hours shall not be excessive and shall comply with industry guidelines and national standards where they exist.
- We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour and have a zero tolerance to modern slavery.
- Team members have the rights of freedom of association and collective bargaining. We respect the right of our team members to choose whether to join a trade union without influence from management.
- We will negotiate in good faith with any properly elected representatives of our employees.
- We will abide by the non-discrimination laws where we operate our business.
- We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- We have formal grievance procedures through which staff can raise personal and work-related issues.





## DUE DILIGENCE PROCESSES

### EMPLOYEES:

Cox Australia recruitment process includes robust controls to validate the ID of any prospective employee and ensure that they have proof of Right to Work. Cox Australia requires all its employees undertake training to understand its core principles, which are to create and sustain a positive working environment where everyone is equally valued and treated fairly with respect and dignity all times. In addition, Manheim has in place a Recruitment Policy and an Equal Employment Opportunities and Anti-Discrimination policy.

### SUPPLIERS:

Our focus on Chain of Responsibility (CoR) has driven us to engage specialist service providers. In 2020, there was mandatory training delivered on CoR and we now manage a training register to ensure participation. We have developed a questionnaire for our carrier companies to ensure they are compliant with legislation. Our National Transport team is guided by an e-learning module on Heavy Vehicle National Law and Regulations (NHVL).

Cox Australia maintains a focus on supplier arrangements with good reputation and outlines its expectations regarding supplier conduct within the Cox ANZ Supplier Code of Conduct. Manheim's standard agreements also include modern slavery provisions addressing the expectation that customers and suppliers must not engage in modern slavery, and that they must engage in practices that minimise the risk of modern slavery within their own operations and supply chains.

## MEASURING EFFECTIVENESS

Cox Australia has a Compliance Officer responsible for managing the operational, regulatory and legal compliance objectives. The Compliance Officer manages the compliance function, conducts internal operational audits, develops and implements improved processes for compliance best practice. Any deviations or lapses are reported to the Cox Australia executive leadership team. The compliance process involves regular reviews followed by dashboard reporting to the Cox Australia executive leadership team and the Operations General Managers.

## TRAINING, AWARENESS AND REPORTING

Cox Australia has an online learning management system combined with a robust course library. It enables targeted learning, boosts employee experience and loyalty, and protects the brand by keeping Cox Australia compliant.

A professional training module on Modern Slavery is included on the learning management system. This has been implemented as a mandatory module at recruitment stage, with a refresher at 2-year intervals. All existing employees are enrolled in the course and completion rates are monitored. Legal and Human Resources have delivered training on the Modern Slavery module for enhanced effectiveness. Any concerns or questions regarding modern slavery are actively diverted to the Compliance Officer who maintains a register and provides immediate attention.



## WHISTLEBLOWING

Manheim has a well-established and effective Whistleblowing Policy and procedure for reporting. The business has a dedicated contact point and encourages reporting to the relevant manager, a legal counsel or Human Resources department. These channels are publicised both through routine training and by workplace posters.

This Statement was approved for and on behalf of Cox Australia by the Board of Directors of CAA on [date] and the Board of Directors of Manheim on [date].



**David Colwell,**  
Chief Executive Officer (and Board Member), CAA



**Charles Cumming,**  
Chief Executive Officer (and Board Member), Manheim



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