

Modern Slavery Statement 2022

Pickles

PICKLES IS COMMITTED TO WORKING WITH ITS SUPPLY CHAIN TO ERADICATE ANY FORMS OF SLAVERY

Introduction

This statement, made pursuant to section 14 of the Modern Slavery Act 2018 (Cth), is published on behalf of Pickles Auctions Pty. Limited (herein referred to as Pickles, we, us or our). The purpose of this statement is to outline our approach to ensuring that Pickles has a framework in place to minimise the risks of modern slavery in our business operations and supply chain. Pickles opposes slavery in all its forms and acknowledges that slavery can occur in many forms as detailed in the Act including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting. Pickles is committed to operating responsibly and adhering to the highest ethical standards. This includes working with our supply chain to eradicate the various forms of slavery.

Our structure, operations and supply chain

Pickles is an asset remarketing business established in 1964. Pickles remarkets and provides valuation services for motor vehicles, trucks and other asset classes. Pickles has over 750 employees located across 22 branches in Australia, with its headquarters in Sydney. Our branch network is fully supported by functions such as risk and compliance, finance, marketing, information technology, legal, WHS and people and culture. Pickles owns the following operating subsidiary, being:

- CarZapp Operations Pty Ltd

The combined turnover of these entities is in excess of \$450 million per annum.

Our customers predominantly comprise vendors such as fleet management, state and federal governments, insurance companies, large corporates, financiers, insolvency practitioners and buyers such as businesses and the general public. Our supply chain includes third parties/vendors who provide assets to be remarketed to buyers, as well as other suppliers who provide goods and services to support our effective operations. These include information technology partners, transport providers and labour hire firms.

ESTABLISHED IN
1964

WE HAVE OVER
750
EMPLOYEES

Risks of modern slavery practices in our operations and supply chains

(a) In Pickles Operations

Pickles considers the residual risk of modern slavery in our operation as low. We monitor and address human rights issues in our operations under the relevant policies and practices.

Employees are encouraged to report any concerns they may have, either to their manager, people and culture or anonymously through Stopline, a third party who has been engaged to host our Whistleblower service. Stopline is not a related party to Pickles and will gather information independently and confidentially and can be contacted on:

(03) 9882 4480 or safecall@stopline.com.au

The majority of our Australian employees have a direct employment relationship with us which minimises the risks of modern slavery. Around 60 per cent of our Australian employees are covered by Modern Awards with the remaining 40 per cent employed by individual agreements. Modern Awards contain minimum pay and entitlements and provide for consultation regarding significant operational changes. In addition, by keeping our use of contracted or third-party labour providers low, we minimise the risk of modern slavery.

Other human rights issues in addition to minimum pay and entitlements that can arise within Pickles operations include equality, fair pay, discrimination and safety.

While these are not necessarily indicators of modern slavery risk, we acknowledge they are potential labour rights issues. We continue to monitor these through policies, practices and appropriate reporting mechanisms. The health, safety and well-being of our employees is our number one priority, and this is also a continued area of focus.

(b) In Pickles supply chains

A potential modern slavery risk for our business is suppliers not complying with labour laws, WHS obligations, excessive working hours, unpaid work, paying below the minimum wage, forced labour and child labour. Actions to assess and mitigate key risks are identified on page 6.



Modern Awards

60%

Individual Agreements

40%



Employees

Actions we will take to assess and mitigate key identified modern slavery risks

Pickles takes a proactive, risk-based approach to eradicating modern slavery risk from its supply chain. This approach should drive higher levels of awareness, engagement and compliance across our supply chain.

The Pickles Audit and Risk Committee has responsibility for overseeing the Company's response to modern slavery risks. Modern slavery risk management is a permanent item on the Committee agenda.

The Executive Committee is accountable for reviewing emerging risks and opportunities and facilitates the sharing of best practice across Pickles.



The specific steps we have taken to assess and mitigate risk in our supply chain include:

- 1 Introducing a modern slavery clause into our standard supply contracts;
- 2 Proactively engaging with stakeholders;
- 3 Communicating the policy to suppliers, customers and employees;
- 4 Continuing to build long-term relationships with our suppliers based on the principles outlined in this statement;
- 5 Educating employees and suppliers on the impacts and risks of modern slavery, and
- 6 Reporting and monitoring grievances.

How we assess the effectiveness of the actions being taken to assess and address modern slavery risks

Our Audit and Risk Committee continues to monitor the effectiveness of the steps we have undertaken in both our operations and supply chain to eradicate any form of slavery, in line with the UN Guiding Principles. These steps as identified on page 6 of this document have been implemented and are now reported on and discussed at each Committee meeting. We will continue to partner with suppliers and other external partners to ensure our response to modern slavery is robust.

How we consult with any entities we own or control

During the reporting period this statement covers, we consulted with the relevant company we own in the development of this statement and communicated the actions and monitoring we are undertaking to enable the eradication of modern slavery.





The way forward – ongoing assessment of risk

In 2022, and the years to come, Pickles will work to increase collaboration with internal and external stakeholders to prevent and address any contribution that Pickles may have to the global issue of modern slavery. Pickles will achieve this by focusing on raising awareness of the forms of modern slavery among our employees and suppliers, continuing to evolve our due diligence processes to aid in the identification of risks, expanding the scope of our supply chain risk assessment, reviewing existing processes and exploring ways to improve identification and action on risks throughout our supply chain.

Further information on Pickles response to modern slavery can be found here:

<https://www.Pickles.com/en/global/csr/modernslavery/>

This statement was approved by the board of Pickles Auctions Pty. Limited and its subsidiaries.



Bruce Maclennan
Chief Executive Officer

Pickles

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