

MODERN SLAVERY STATEMENT – JOWETT MOTOR GROUP PTY LTD

Overview

Jowett Motor Group Pty Ltd (A.C.N 069 648 433) (the **Group**) makes this Modern Slavery Statement (**Statement**) in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**).

Modern slavery can occur in every industry, and it involves grave abuses of human rights and serious crimes, often disproportionately affecting women and girls.

Freedom from slavery is a fundamental human right.

The Group seeks to prevent, mitigate, and, where appropriate, remedy modern slavery in its operations and supply chain in line with the United Nations' Guiding Principles on Business and Human Rights.

Structure

The Group is the relevant reporting entity under the Act, and it is a private company registered in Australia that operates BMW and Honda motor vehicle dealerships across Victoria and South Australia.

The Group's registered office is located at 579 Springvale Road, Glen Waverly in the State of Victoria. The Group does not own or control any other entities that employ or engage any workers.

Operations

The Group's operations include:

Direct employment of workers	The Group directly employs approximately 370 employees in Australia consisting of a predominantly permanent, skilled workforce.
Provision and delivery of products or services	The Group sells and services new and used motor vehicles, as well as aftermarket products, parts and accessories in South Australia and Victoria.
Financial lending	The Group acts an intermediary to introduce customers to lenders for finance on their vehicles. However, the Group itself does not lend.
Distribution, purchasing, marketing and sales	The Group distributes vehicles, parts and accessories on behalf of Honda and purchases BMW vehicles, parts and accessories for resale.

Supply chain

The products and services (including labour) that contribute to the Group's own products and services are as outlined below.

Products provided to the Group by suppliers	Vehicles, parts and accessories are supplied to the Group by Honda and BMW. Honda's 2023 Modern Slavery Statement outlines its supply chain risks. BMW's 2022 Modern Slavery Statement outlines its supply chain risks. In addition to this, the Group also obtains cleaning products from third parties.
Services provided to the Group by suppliers	Most of the services provided to the Group include legal, financial, accounting, technology and cleaning services. These services are provided by large, reputable and well-run Australian businesses.

Modern slavery risks

The Group assesses its modern slavery risks with reference to the general sectors, industries, types of products and services, financial landscape and countries in which the Group and / or its suppliers operate.

The Group considers that it has a low risk of modern slavery based on its assessment outlined below:

Sector and industry risks	The Fair Work Ombudsman has not identified the automotive dealership industry as a priority compliance sector for 2023 – 2024. Priority sectors are agriculture, building and construction, care, fast food, restaurants and cafes, large corporates and universities.
Product and services risks	The Group's main vehicles, parts and accessories are supplied by Honda and BMW. Honda's 2023 Modern Slavery Statement identified its main modern slavery risks as being in the procurement of parts, merchandise and accessories. BMW's 2022 Modern Slavery Statement identified higher risks of modern slavery as existing where vehicles and parts were sourced overseas. Both Honda and BMW are proactive in addressing their modern slavery risks.

	Services provided to the Group include legal, financial, accounting, technology and cleaning services provided by large, reputable and well-run Australian businesses, where there is a low risk of modern slavery.
Geographic risks	The Global Slavery Index 2023 notes that within the Asia Pacific, the Australian Government has taken the most action to combat modern slavery and that Australia has the lowest vulnerability to modern slavery in the region.
Entity risks	As the Group is proactive in ensuring that it addresses compliance risks within its own operations, it considers that it has a low risk of modern slavery.

General approach to compliance

The Group's general approach to compliance includes the actions outlined below:

- **Migration compliance:** Undertaking internal checks and relying on external support where required.
- **Regular wages audits:** Regular wages audits of payroll processes to identify risks of non-compliance and improve remediation outcomes.
- **Management capability:** Regular training and upskilling in workplace relations matters.
- **Health and safety capability:** Collaborating with safety advisors and relevant internal and external stakeholders as required.
- **Leveraging external support:** Leveraging support from industry associations, law firms and auditors where required - for example, to review and update employment documentation to ensure compliance with relevant legislation.
- **Grievance management:** Managing grievances in accordance with applicable modern awards as well as assessing whether grievances raised constitute a systemic risk and if they do, implementing a remediation plan with external support where required.
- **Cooperative workplace relationships:** Cooperating with employee representatives to ensure that workplace relations risks are properly managed.
- **Policies and procedures:** Adopting policies and procedures to support workplace relations compliance.

Reducing modern slavery risks

The Group seeks to take the following steps to reduce modern slavery risks within the key areas of its supply chain:

- **Identifying risks:** Due diligence to identify risk factors based on sector, industry, product, services, geographic and entity risks.
- **Assessing risks:** Where supply chain risks are identified, the Group seeks to investigate, verify and validate such risks on a case-by-case basis.
- **Mitigating modern slavery risks:** Integrating findings with respect to modern slavery risks by applying targeted contractual requirements to implement safeguards, training, grievance management and monitoring.
- **Remediation:** Exploring appropriate processes for helping affected workers on a case-by-case basis with reference to whether the Group has caused, contributed to or been directly linked to modern slavery.
- **Monitoring and reporting:** Annual reviews as required under the Act for relevant reporting periods.

Conclusion

This Modern Slavery Statement supports the Group in its efforts to prevent, mitigate, and, where appropriate, remedy modern slavery in its operations and supply chain.

Jowett Motor Group Pty Ltd

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