

Modern Slavery Policy Statement

Policy Owner	Human Resources
Version Number	POL-002
Review Details	This policy is effective from 1 st July 2020 This policy was last updated on 1 st July 2020

1. Purpose

In 2019 the Australian Federal Government introduced new legislation regarding the impacts of slavery in the modern day and what Australian business can do to support the eradication of such human right exploitation across the globe. As such the government introduced the Modern Slavery Act 2018, which has requirements for large businesses to implement processes and a policy statement that would support the goals of the Act.

2. Application

This policy statement applies to all Servco Australia and associated entities Officers, Employees or anyone who performs work on our premises and anyone who supplies us with goods and services. This policy must be reviewed and administered by each entities Senior Management team and has been approved by the Servco Australia Board of Directors.

3. Policy Statement

3.1 Our Structure, Business and Supply Chain

Servco Australia Pty Ltd is a privately-owned business that operates automotive retail facilities across Australia representing the key brands of Toyota, Lexus and Harley Davidson. Each Dealership operates as its own entity and in partnership with a Dealer Principal who has an equity interest in that specific entity. Currently Servco Australia has both metropolitan and regional operations across Queensland, New South Wales, Victoria and Western Australia employing some 1100 people in 30 locations covering all aspects of an Automotive Dealership.

The Automotive industry relies on an extensive supply chain, ensuring the ongoing supply of vehicles and parts to Australian consumers. Cars, parts, oils, fuel, third party contractors, employment, travel, IT infrastructure etc are all part of our supply chain that presents potential risks of exposure to modern slavery practices.

Servco Australia is committed to operating in an ethical and lawful manner in everything we do, along with ensuring all our partners and suppliers are aligned to our values of Respect, Service, Teamwork and Innovation. Furthermore, we expect everyone within our supply chain to operate in accordance with the relevant modern slavery laws that act against human slavery, human trafficking and child labour.

3.2 Modern Slavery Risks in our Business

The automotive industry in Australia relies heavily on the importation of vehicles, accessories and spare parts from all over the world. Because of this global network and reliance on overseas products, potential risk of suppliers not complying with the same integrity and focus we have on modern slavery is real. Currently we source the majority of our products through Toyota Motor



Corporation Australia as part of a franchise arrangement. Any additional products to support the industry are supplied through large reputable suppliers.

3.3 Actions taken

The Strategic direction and growth of Servco has been centred around a single branded strategy making us the largest Toyota dealership network in Australia. By limiting the brands we represent we are also limiting the number of manufacturers and suppliers we need to deal with, minimising potential risks of modern slavery exposure.

Even with the above strategy, potential exposure to exploitation exist. Servco Australia and its related entities have and continue to introduce policies and procedures to mitigate any potential risk and exposure to modern slavery. The procurement of any goods and service is done so in line with all our policies and through reputable companies with similar positions to Servco on human rights and civil liberties.

Servco Australia is developing a Whistleblowers policy and hotline that is being made available to anyone within the supply chain to report breaches of this and other policies. This is being introduced throughout 2020 and will complement the role out of this policy statement.

To support this approach and additional to the whistleblowers process above, Servco Australia introduced a mandatory third-party HSE and incident reporting tool across the Dealership network where employees and management can report any potential exposure to breaches of this and any other safety related matter. Once logged, each incident is tracked and has associated actions.

3.4 Effectiveness

Servco Australia completes a series of internal audits of our businesses on a regular basis to ensure we are meeting or exceeding our expectations. This process reviews various areas of our business against a set criterion. We plan to introduce a review process of each locations understanding, awareness and compliance with this policy.

On a monthly basis a review of the incident management system is conducted and any breach of this policy or human rights will be reported to the Executive team.

Once in place, any whistleblower reports will be dealt with in accordance with the relevant policy and reported on.

Any suspected breach of this policy statement will be investigated thoroughly through our standard process in line with our legal obligations and reported to the Board of Directors.

3.5 Consultation with Key Stakeholders

This policy has been developed in consultation with all key Stakeholders across all our entities, including those who do not need to comply with the Act. The Servco Australia Board of Directors have reviewed and endorsed this statement, along with each Equity owner and Board member of all associated entities.

Approved on behalf of the Board by:

Nick Pappas

Managing Director Servco Australia Pty Ltd

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Bill Parissis

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