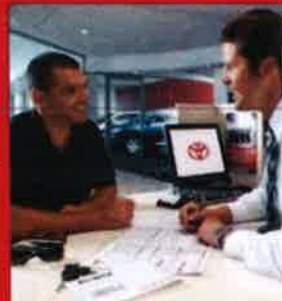


# Modern Slavery Statement 2020



**tonywhite**  
GROUP

### Reporting Entity's Structure, Operations & Supply Chains

This Modern Slavery Statement is prepared by TWG Corporate Pty Ltd ACN 114 142 095 as Trustee for ("ATF") White King Corporate Unit Trust ABN 70 760 893 620 trading as The Tony White Group and includes the following entities:

- White/King Brisbane Pty Ltd ACN 109 437 587 ATF White/King Brisbane Unit Trust ABN 31 663 193 507;
- Elsternwick Dealership Pty Ltd ACN 139 959 149 ATF Elsternwick Dealership Unit Trust ABN 33 455 121 828;
- Mornington Dealership Pty Ltd ACN 165 097 816 ATF Mornington Dealership Trust ABN 88 290 325 809;
- Listaglen Pty Ltd ACN 006 050 997 ATF Barratts Business Trust ABN 58 873 934 293;
- PPT Investments Pty Ltd ABN 80 000 868 860;
- Trinity Motors Pty Ltd ACN 097 743 578 ATF White Cairns Dealership Trust ABN 17 126 951 482;
- Frolad Pty Ltd ACN 080 868 953 ATF Tony White Albury Trust ABN 96 603 230 104;
- White/King Wollongong Pty Ltd ACN 103 483 389 ATF White King Wollongong Trust ABN 32 392 404 226; and
- White Watson Motors Pty Ltd ACN 127 025 941 ATF White Watson Motors Unit Trust ABN 94 202 768 033.

Hereinafter referred to as "the Group".

Each entity is an independently run motor vehicle dealership operating in numerous locations across the east coast of Australia. The Group collectively employs over 1,250 staff and operates the following departments:

- Vehicle Sales;
- After Sales Service;
- Parts Sales;
- Service; and
- Management & Administration

Most departments are asset intensive and this, coupled with the numerous vehicle manufacturers the dealerships liaise with, results in prodigious supply chain networks.

While a significant portion of the Group's direct supply chain expenditure is in Australia, most vehicles are sourced from global suppliers who have operations worldwide. In these instances, the Group deal with Australian-based subsidiaries of our vehicle manufacturers. Accordingly, the Group's supply chains include the overseas factories where vehicles are manufactured, importation of the vehicles into Australia and the subsequent sale and distribution of the vehicles to the Group.

Vehicle parts are generally sourced within Australia but may follow similar supply chains to our vehicles. The Group's supply chains also include services that contribute to its operations, such as the cleaning and security companies that service our dealerships and offices.

The Group identifies the risk of modern slavery within its Australian operations as low. However, we recognise that through our supply chains we can be indirectly exposed to the risks of modern slavery.

The Group's engrained culture promotes responsible business practices and adherence to the highest ethical standards. We will not tolerate any forms of slavery or human trafficking in our organisation.

### Modern Slavery Risks in Operations & Supply Chains

The Group operates within Australia, a nation with a low vulnerability to modern slavery rating as identified by the Global Slavery Index 2018. The Group has taken several factors into consideration when assessing its direct risk to modern slavery, including the type of labour involved in the delivery of services or marketing of goods and the characteristics of the motor vehicle retail and service industry.

Taking into consideration the nature of our business and our strict governance policies, we assess that there is a low risk of modern slavery where we have operational control. As a consequence of the Group's global supply chain the risk of exposure to modern slavery is predominately centred around our overseas suppliers.

We expect our suppliers to operate in accordance with all applicable modern slavery laws. The Group monitors the provision of our suppliers' modern slavery statements and reviews these to assure us of their compliance.

### Actions Taken to Assess & Address Risks

The Group's corporate policies encourage ethical behaviour and promote compliance with legislation such as the Modern Slavery Act 2018. These policies, with support from well-structured business systems ensure that the Group prevent modern forms of slavery within our business.

In the financial year ending 30 June 2020, being the first full financial year following introduction of The Modern Slavery Act 2018, only senior management were educated on the risks of Modern Slavery. The Group will endeavour to educate remaining employees during the financial year ending 30 June 2021.

The Group is committed to reducing modern slavery risks within its own business and aiming to influence reduction through its supply chains. In addition to this the Group dedicates itself to continual progression of internal controls to ensure that modern slavery does not take place within its own business.

The Group aims to eliminate any opportunity for modern slavery to arise in our direct business by implementing robust policies and procedures which foster appropriate business behaviour. We commit to uphold the highest of standards for our employees and where possible to carry out due diligence to ensure these high standards are adhered to by our suppliers.

We intend to update our group policies to include our approach to address the various risks of modern slavery within our business. This will ensure any future issues are dealt with immediately and effectively.

### Effectiveness of Actions Taken

In the financial year ending 30 June 2020, no modern slavery concerns were raised within the Group however we are well equipped to deal with any concerns that are identified in the future. We will conduct all necessary investigations in accordance with regulatory framework to ensure an expeditious resolution.

Process of Consultation with Subsidiary Entities in Preparing Statement

The Group adheres to policies governed by corporate which help monitor and assess risks such as modern slavery. Prior to preparing this statement consultation with members of the Group was undertaken to further assess their approach to manage modern slavery risks.

This Statement has been approved by the principal governing Body of the Group, being the Chief Executive Officer and Managing Director as well as the Chief Financial Officer. The Statement was approved on 3 February 2021.

Signed



Anthony White

Group Chief Executive Officer and Managing Director

1 March 2021