

Modern Slavery Statement

FY2023

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1 Introduction

This joint statement is prepared and made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) by FleetPartners Group Limited on behalf of itself and the following subsidiaries:

- Fleet Partners Pty Limited
- Pacific Leasing Solutions (Australia) Pty Limited
- Leasing Finance (Australia) Pty Limited
- Fleet Holding (Australia) Pty Limited

(together **FleetPartners, Group, we** or **our**) in respect of the financial year ended 30 September 2023 (**Reporting Period**).

FleetPartners remains committed to ethical business practices and respecting human rights in our operations and our supply chain.

This statement has been approved by the Board of Directors of FleetPartners Group Limited.

2 Our structure, operations and supply chain

2.1 OUR STRUCTURE

FleetPartners Group Limited is incorporated in Australia and is listed on the Australian Stock Exchange (ASX:FPR). FleetPartners Group Limited was formerly known as Eclipx Group Limited and changed its name during the Reporting Period.

The Group's head office is in St Leonards, New South Wales and we have presence in Melbourne, Brisbane and New Zealand. Some of our workforce work remotely in Australia on a permanent basis.

The Group's annual consolidated revenue in the financial year ending 30 September 2023 was \$676,774,000.

FleetPartners Group Limited is the parent company that owns or controls the subsidiaries listed in Appendix 1.

2.2 OUR OPERATIONS

FleetPartners provides vehicle leasing and fleet management services in Australia and New Zealand. In Australia, we also provide novated leasing and salary packaging benefits.

We have approximately 500 employees in both Australia and New Zealand, the majority of whom perform office based functions. A small number of employees perform on-site audits and inspections of certain Australian-based suppliers.

During the Reporting Period, we commenced the consolidation of distinct business units that had operated under standalone brands (FleetPlus and FleetChoice) under FleetPartners. The first phase of this consolidation was completed in March 2023, and all business units report into shared operational and management teams. This includes corporate functions such as procurement, finance and human resources.

2.3 OUR SUPPLY CHAINS

Our business is primarily office based, focussed on the provision of vehicle leasing and fleet management services. This includes novated leases and salary packaging services. During the lease term we arrange for vehicle in-life services to be provided and at lease end, we arrange for the vehicle to be re-marketed.

We often partner with motor vehicle dealers, repairers, fuel providers, auction houses, insurers, telematics, software and data providers. These entities are primarily based in Australia and New Zealand. Some IT software and services are procured from suppliers located in Singapore, India and USA.



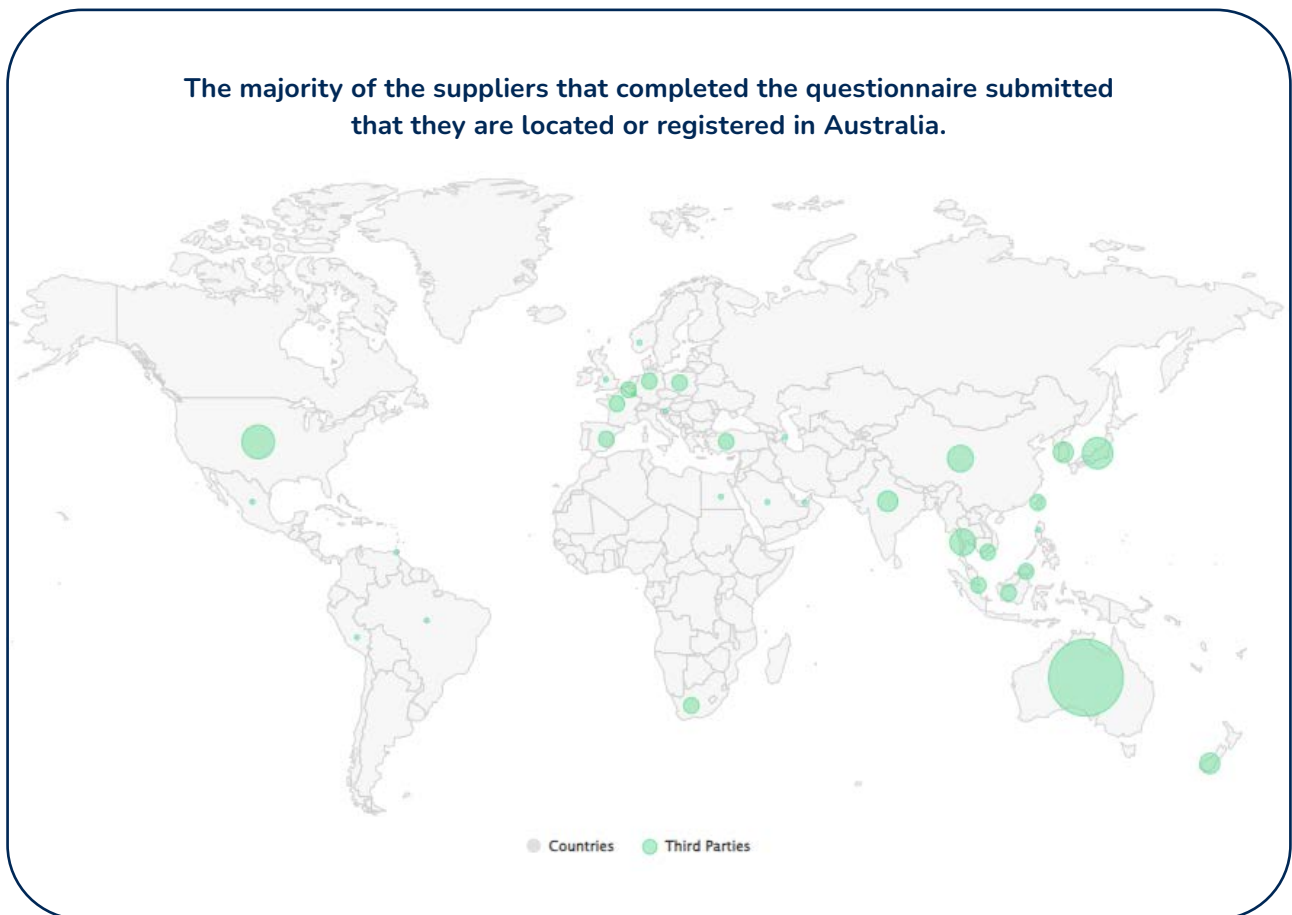
Suppliers in our supply chain can be broadly classified into two categories: vehicle lifecycle and corporate support.

In the vehicle lifecycle category, our supply chain includes vehicle dealerships and manufacturers, maintenance and repairers, vehicle auction houses and disposal agents, tyre suppliers, fuel and energy suppliers, vehicle transport, after-market vehicle accessories, accident management services roadside assistance, in-vehicle monitoring systems, rental car providers and insurance.

Suppliers that we engage for corporate support include financiers, professional services (e.g consultancy, legal, advisory, creative), insurance, property owners and managing agents, technology services and products, office related supplies, travel and accommodation, utilities and catering.

Within these supply chains, we generally have long-term arrangements with suppliers. We do, however, transact with certain suppliers on an ad hoc basis from time to time.

Based on the responses of the direct suppliers that completed the modern slavery questionnaire the geographic footprint of these suppliers is shown below.



3 Risks of modern slavery in our operations and supply chain

3.1 RISK IN OUR OPERATIONS

The Global Slavery Index 2023 estimates that on any given day in 2021 there were approximately 41,000 individuals living in modern slavery in Australia and 8,000 in New Zealand ¹. On a scale of 0 to 100, with 100 being the highest vulnerability to modern slavery, Australia is rated as 7 and New Zealand is rated as 8, both resulting in below average vulnerability for the region.

Accordingly, as our operations are based in Australia and New Zealand, we consider that the geographic risk of modern slavery in our operations remains low.

The low geographic risk, combined with our employment and recruitment practices and our workforce profile, reduces the risk of our business causing or contributing to adverse human rights impacts, including modern slavery in our operations. Our employment and recruitment practices include various policies, systems and procedures designed to address ethical employment practices, human rights, and our employees' rights to a flexible and safe workplace and appropriate remuneration. The policies cover topics such as:

- Diversity, Equity and Inclusion;
- Remuneration;
- Family and Domestic Violence;
- Dispute Resolution; and
- Work Health Safety and Wellbeing.

We conduct our operations in accordance with our Code of Conduct and our policies, systems and procedures aim to ensure we remain compliant with relevant legislative requirements.

We transparently manage the remuneration of our employees in a fair and equitable manner, reflecting the responsibilities of each role, alignment with local market conditions and legislative requirements.

We also conduct an annual gender pay review to help mitigate gender pay disparities. During the Reporting Period FleetPartners maintained our status as a Workplace Gender Equality Agency (**WGEA**) Employer of Choice for Gender Equality and Work180, recognising and endorsing us as an 'Employer for All Women.' Furthermore, we also achieved a reduction of 6.1% in the gender pay gap.

¹ Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available from: <https://www.walkfree.org/global-slavery-index/country-studies/australia/> and <https://www.walkfree.org/global-slavery-index/country-studies/new-zealand/#:~:text=in%20the%20region,-Prevalence,modern%20slavery%20in%20New%20Zealand.>

We provide all employees access to an external employee assistance program which offers a range of support services including workplace issues, critical incidents, diversity and inclusion, family and healthy relationships, health and wellbeing.

Through self-assessment in FY22 and re-assessment in FY23, we mapped initiatives that align with our three sustainability priorities – Our People, Our Community, Our Environment – to identify how we are contributing to the SDGs. We contribute to 7 of the SDGs including:



3.2 RISK IN OUR SUPPLY CHAIN

Based on our direct procurement categories, location of our key direct suppliers and our risk assessment results from the questionnaire process, we consider that the risk of having caused or contributed to adverse human rights impacts, including modern slavery, in our supply chain remains low.

However, we recognise that the supply chains of our direct suppliers are likely to include suppliers (both direct and indirect) from countries where modern slavery practices such as forced labour, debt bondage and the worst forms of child labour are more prevalent. Suppliers in the manufacturing sector have increased exposure to modern slavery risks as a result of complex supply chains that are reliant on raw materials sourced or processed from higher risk countries (for example: critical minerals for electric vehicle batteries or smartphones; information technology infrastructure manufacturers; and natural rubber used in tyres). We are also conscious of reports of modern slavery in the automotive manufacturing sector.²

Suppliers of services reliant on base-skilled workers with low barriers to entry also have increased exposure to having caused, contributed or become linked to modern slavery, such as forced labour and debt bondage, irrespective of the jurisdiction risk profile. For example, cleaning services, labour hire and temporary staffing and recruitment are sectors with higher vulnerability to modern slavery even in low risk countries like Australia and New Zealand.

Consistent with the Group's assessment of its own modern slavery risk, the risk mapping and due diligence procedures, undertaken within the parameters described in section 4.1 below, we consider the majority of our key direct suppliers as having a lower risk of modern slavery within their operations. Greater risk exists within their respective supply chains as described above.

² [Driving Force – Automotive Supply Chains and Forced Labor in the Uyghur Region \(shuforcedlabour.org\)](#)

4 Action taken to assess and address modern slavery risks

During the Reporting Period, we focused on embedding measures previously introduced, including the policies that apply across the Group, including all other subsidiaries.

4.1 SUPPLIER DUE DILIGENCE

In the previous reporting period, we enhanced our existing supplier due diligence methodology, risk mapping and due diligence process by implementing the ethiXbase360 platform to provide us with a more structured approach to assessing the risk of modern slavery in our supply chain.

During the Reporting Period through the ethiXbase360 platform, we requested key suppliers complete a modern slavery questionnaire (**MSQ**) developed in conjunction with international law firm Norton Rose Fulbright. The parameters used to select these key direct suppliers to our Australian business included:

- those assessed in previous reporting periods as posing a medium or high modern slavery risk regardless of other criteria or spend threshold;
- targeted industries of automotive glass, cleaning services, labour hire and temporary staffing and recruitment, clothing and garment supply, fossil fuel suppliers, tyre suppliers, travel services, vehicle maintenance – identify spend threshold and include those; and
- strategic importance or materiality to our operations. These included ICT, financial services, professional services and certain heavy commercial vehicle suppliers/ maintenance providers.

Responses are weighted focusing on the perceived risk factors of:

- industry (product or services risk);
- jurisdiction (country of origin risk);
- workforce composition; and
- mitigating measures (approach to human rights and health and safety including policies, processes and systems).

The analytics applied to the responses results in each supplier being assigned a low, medium or high risk rating based on based on their answers to the MSQ.

We were able to assess these results and verify the due diligence conducted in previous years. However, this methodology has also brought to our attention some suppliers that will be the focus of further due diligence in the next reporting period.

Some of our key suppliers in the vehicle manufacture, IT, insurance and finance sectors declined to complete our MSQ, preferring instead to submit their own modern slavery

statements for our review. These were assessed independently of the MSQ and the statements typically describe the possibility of modern slavery in their supply chain of their sub-suppliers.

4.2 TRAINING

We have continued to deliver the current Modern Slavery training provided to our employees in Australia as well as a targeted group of employees in New Zealand and have improved the completion rate from the previous reporting period of 93% to 99.7%. We did not achieve 100% due to extended leave taken by some of our employees during the Reporting Period.

Employees within the Group, including those employed in our subsidiaries, are required to complete comprehensive compliance training in relation to, among other regulatory obligations, identifying modern slavery and human trafficking risks. Existing employees are required to renew their compliance training biennially.

4.3 MODERN SLAVERY POLICY

The Group's Modern Slavery Policy, developed during the 2020 reporting period, outlines a formal governance structure to address modern slavery risks which includes a requirement for all employees, contractors and personnel to identify and report modern slavery risks to the Modern Slavery Policy Officer. The Modern Slavery Policy, as well as the Whistleblower Policy, make it clear that any who reports concerns will not be subjected to retaliation for reporting such risks.

During the Reporting Period, no reports of actual or suspected modern slavery were made to the Modern Slavery Policy Officer.

4.4 WHISTLEBLOWER POLICY

Our [Whistleblower Policy](#), which applies in both Australia and New Zealand, is one of a number of policies that fosters a culture of compliance, honesty and ethical behaviour and underpins our values.

We encourage the reporting of any instances of "Disclosable Matters" (i.e. Reportable Conduct under Australian law or Protected Disclosures under New Zealand law) including suspected unethical, illegal, fraudulent or undesirable conduct involving our businesses, and will ensure that those persons who make a report may do so without fear of intimidation, disadvantage or reprisal.

Under our Whistleblower Policy, "Disclosable Matters" specifically include conduct or activities relating to human rights or modern slavery issues as being matters that may be reported under this Policy. During the Reporting Period, we continued to monitor the reports made via our whistleblowing channels.

4.5 SUPPLIER CODE OF CONDUCT

During the Reporting Period, FleetPartners published its [Supplier Code of Conduct \(Supplier Code\)](#). The Supplier Code articulates our minimum expectations of suppliers providing goods and services to FleetPartners in both Australia and New Zealand that we expect our suppliers to meet or exceed, including:

- acting ethically and with integrity, including to prevent bribery, corruption, fraud, tax evasion and money laundering;
- respect and protect intellectual property rights and privacy of personal information;
- complying with all applicable human rights related laws;
- create a safe working environment for their workers, including not permitting any form of forced, bonded or indentured labour; and
- ensuring they strive to improve their own sustainability performance.

All suppliers that responded to our MSQ have either agreed to comply with our Supplier Code or comply with their own comparable code.

We have included undertakings to adhere to the Supplier Code in our revised standard supplier agreements.

4.6 OTHER INFORMATION

Our 2023 [Sustainability Report](#) describes our response to the GRI Standards, including GRI 408 which concerns the impact of our business as it relates to child labour. More information can be found on page 42 of the Sustainability Report. GRI 401 addresses the topic of employment including hiring, recruitment, retention and related practices. Other GRIs address training and education as well as diversity and equal opportunity. Information on these GRIs can be found on pages 33-41 of the Sustainability Report.



5 Effectiveness

We remain committed to evaluating the effectiveness of our actions and adapting and strengthening our approach as necessary and we will continue to monitor the Group's compliance with the policies and procedures as set out in this statement and update the Board on any emerging risks or modern slavery-related concerns identified during the next reporting period.

6 Next steps

Our action plan for the next reporting period, is to consolidate our current program and:

- use the results from our MSQ to engage with those key suppliers identified as having a higher risk of modern slavery and to the extent possible, use our leverage³ to mitigate any adverse human rights impacts with those suppliers;
- review our Modern Slavery Policy and Procedures to consider the overall effectiveness of our approach, including assessing our supplier onboarding processes;
- continue to require suppliers (including ad hoc purchases) to adhere to the Group's Supplier Code of Conduct; and
- continue to deliver the current Modern Slavery training provided to the Group's employees.

7 Consultation

FleetPartners operates a shared services model (except for certain divisions), and has centralised IT, finance, risk and legal functions within the Group, including its subsidiaries.

Accordingly, there is one management team responsible for coordinating the Group's approach to assessing and addressing the modern slavery risks within the Group and for preparing this statement. This process constituted the consultation process with the entities owned or controlled by FleetPartners in the development of this statement.

³ **Leverage** is considered to exist where the enterprise has the ability to effect change in the wrongful practices of an entity that causes harm (United Nations Guiding Principles on Business and Human Rights 2011).

8 Approval

This statement is made pursuant to section 14(1) of the Act and constitutes the Modern Slavery Statement for the reporting period ending 30 September 2023 for FleetPartners Group Limited, as a Joint Statement, inclusive of the relevant related companies of FleetPartners Group Limited to which the Act applies.

In Australia, these related companies are

- Fleet Partners Pty Limited;
- Pacific Leasing Solutions (Australia) Pty Limited;
- Leasing Finance (Australia) Pty Limited; and
- Fleet Holding (Australia) Pty Limited.

FleetPartners Group Limited, as the ultimate holding company and higher entity of the these companies, is in a position to control each reporting entity covered by this statement.

This statement has been approved by the Board of FleetPartners Group Limited on 21 March 2024 and signed by Gail Pemberton AO, Chair and Damien Berrell, Chief Executive Officer and Managing Director.



GAIL PEMBERTON AO
CHAIR



DAMIEN BERRELL
CHIEF EXECUTIVE OFFICER AND
MANAGING DIRECTOR

APPENDIX 1

Structure

The following wholly owned subsidiaries are controlled by FleetPartners Group Limited unless otherwise stated:

AUSTRALIA

CarInsurance.com.au Pty Ltd

Car Insurance Pty Ltd

Eclix Insurance Pty Ltd

Fleet Aust Subco Pty Limited

Fleet Choice Pty Ltd

Fleet Holding (Australia) Pty Limited

Fleet Partners Franchising Pty Limited

Fleet Partners Pty Limited

FleetPlus Asset Securitisation Pty Ltd*

FleetPlus Holdings Pty Ltd

FleetPlus Novated Pty Ltd

FleetPlus Pty Ltd

Leasing Finance (Australia) Pty Limited

Pacific Leasing Solutions (Australia) Pty Limited

PackagePlus Australia Pty Ltd

PLS Notes (Australia) Pty Limited

Accident Services Pty Limited

Leasing Finance Services Pty Ltd

Equipment Finance Holdings Pty Ltd

NEW ZEALAND

FleetPlus Limited (NZ)

FleetPartners NZ Trustee Limited

FleetPartners Holding (NZ) Limited

Fleet NZ Limited

Leasing Finance (NZ) Limited

Pacific Leasing Solutions (NZ) Limited

PLS Notes (NZ) Limited

Truck Leasing Limited

FleetPartners NZ Limited

* The Group does not have control of FleetPlus Asset Securitisation Pty Ltd.

APPENDIX 2

Mandatory Reporting Criteria

The table below identifies the section and page number in which the mandatory criteria have been addressed.

MANDATORY CRITERIA	SECTION IN STATEMENT	PAGE
1. Identify the reporting entity	Section 1	1
2. Describe the reporting entity's structure, operations and supply chains	Section 2	3
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that it owns or controls	Section 3	6
4. Describe the actions taken by the reporting entity and any entity that it owns or controls, to assess and address these risks, including due diligence and remediation processes	Section 4	8
5. Describe how the reporting entity assesses the effectiveness of these actions	Sections 5 and 6	11
6. Describe the process of consultation with any entities that the reporting entity owns or controls	Section 7	11
7. Include any other information that the reporting entity considers relevant (optional)	Section 4.6	10

