



MODERN SLAVERY STATEMENT

Reporting Period: 1 July 2024 and 30 June 2025

1. Introduction

In this Statement, unless expressly stated otherwise, references to the **NGP Group** refer to **NGP Investments (No.1) Pty Ltd** and the reporting entities listed in **Schedule 1**, as defined in the *Modern Slavery Act 2018 (Cth)* (the Act).

The NGP Group submits this Statement on its own behalf and on behalf of each reporting entity within the Group. This Statement outlines the actions taken during the reporting period to identify, assess, and address modern slavery risks within our operations and supply chains.

All entities within the NGP Group are incorporated in Australia.

The NGP Group opposes all forms of modern slavery. We recognise the importance of protecting human rights and are committed to ensuring that our employees, customers, contractors, and those within our supply chain are treated with dignity and respect and are free from exploitation.

2. Business Structure, Operations and Supply Chain

Business Structure and Operations

The NGP Group consists of privately owned Australian companies operating automotive retail dealerships across New South Wales, the Australian Capital Territory, and Queensland. Our operations include:

- Sale of new and used vehicles.
- Vehicle servicing and repairs.
- Parts supply.
- Consumer finance facilitation.

During the reporting period, the NGP Group employed an average of **1,377 people**.

Supply Chain

The NGP Group's supply chain primarily involves:

- Procurement of motor vehicles and parts from overseas manufacturing and assembly facilities.
- Procurement of transportation and logistics services from local contractors.
- Procurement of local services such as security, vehicle detailing, cleaning, and branded goods.

The NGP Group maintains long-term supply arrangements with major suppliers, including overseas equipment manufacturers (OEMs).

3. Risks of Modern Slavery Practices in our Operations and Supply Chain

The NGP Group acknowledges that modern slavery risks may arise in both direct and indirect supply chains. Key risk areas identified during this reporting period include:

Operational Risk

Our direct operations are based wholly within Australia, which is considered a lower-risk jurisdiction. However, risks may arise through:

- Use of unskilled or migrant labour in contracted services.
- Third-party recruitment practices.
- Outsourced cleaning, detailing, and security services.

Supply Chain Risk

Higher-risk areas identified include:

- **Manufacturing:** Risks associated with global automotive manufacturing, including forced labour, excessive overtime, and unsafe working conditions, as identified in OEM modern slavery statements.
- **Migration Services:** Offshore labour recruitment, particularly from the Middle East and the Philippines, where risks of recruitment fees, contract substitution, and coercion are elevated.
- **Service Procurement:** Industries such as cleaning, security, and branded goods procurement, which are recognised as higher-risk sectors for modern slavery due to vulnerable workforces.

4. Broader Risk Considerations

The NGP Group recognises that modern slavery risks may arise due to:

- Complex, multi-tiered global supply chains.
- Limited visibility over subcontracting arrangements.
- Reliance on overseas manufacturing partners.

5. Actions taken to address and assess modern slavery risks.

The NGP Group undertook the following actions during the reporting period:

Due Diligence and Supplier Engagement

- Reviewed modern slavery statements of major suppliers, including OEM partners.
- Conducted supplier questionnaires to identify potential risk indicators.
- Requested additional information from suppliers where risks were identified.
- Included modern slavery compliance expectations in supplier engagement processes.

Ethical Recruitment Practices

- Partnered with a Registered Migration Agent and specialist recruiters to ensure offshore labour recruitment is free from recruitment fees and coercive practices.
- Ensured migrant workers are not charged recruitment fees and retain control of their identity documents.

Internal Governance

- Maintained a dedicated internal working group responsible for modern slavery compliance, risk assessment, and policy oversight.
- Reviewed issues raised through internal reporting channels, including the Whistleblower Protection Policy.

Training and Awareness

- Delivered modern slavery awareness training, with all senior management completing an online training module on modern slavery risks.
- Provided targeted training to employees involved in procurement and recruitment.

Reporting and Remediation

- Maintained anonymous reporting channels for employees and third parties to raise concerns.
- Established a process for investigating and responding to modern slavery concerns, including escalation pathways and remediation steps.
- Confirmed that no substantiated modern slavery incidents were identified during the reporting period.

Policy Framework

- Maintained and updated key policies, including:
 - Modern Slavery Policy.
 - Whistleblower Protection Policy.
 - Code of Conduct.

6. Assessing the Effectiveness of Our Actions

The NGP Group is committed to continuously improving its approach to modern slavery risk management. During this reporting period, we assessed effectiveness through:

- Monitoring supplier responses to modern slavery questionnaires.
- Reviewing training completion rates.
- Evaluating the adequacy of internal reporting mechanisms.
- Conducting an annual senior management review of modern slavery risks and actions.
- Tracking improvements in supplier transparency and engagement.

We acknowledge that measuring effectiveness is an ongoing process and will continue to refine our approach.

7. Consultation with Reporting Entities

The NGP Group consulted with all reporting entities through:

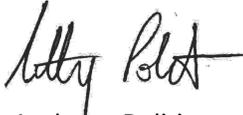
- Monthly management meetings.
- Centralised policy development.
- Shared procurement and risk management processes.
- Engagement with senior leaders across all dealerships.

This collaborative approach ensures consistent identification and management of modern slavery risks across the Group.

8. Approval

This Statement was approved by the boards of each reporting entity listed in **Schedule 1**.

Regards



Anthony Politis
Chief Executive Officer
NGP Group

NGP Group

Schedule of Reporting Entities

| Company Name | ABN |
|--|-----------------|
| N G P Investments (No 1) Pty Ltd | 80 001 495 352 |
| N G P Investments (No 2) Pty Ltd | 78 001 495 343 |
| Belconnen Automotive Pty Limited | 70 151 606 138 |
| Castlereagh Automotive Pty Ltd | 84 136 581 970 |
| Coniston Trucks Pty Ltd | 15 638 816 912 |
| Inchurch Automotive Pty Ltd | 74 137 048 474 |
| N G P Canberra Investments Pty Limited | 45 003 484 571 |
| NGP Group Services Pty Limited | 25 143 438 797 |
| N G P Melbourne Investments Pty Ltd | 48 078 856 381 |
| N G P Melbourne Pty Ltd | 79 004 074 819 |
| N G P Phillip Automotive Pty Ltd | 12 629 047 909 |
| N G P Wollongong Pty Ltd | 33 632 002 781 |
| NDM Investments Group Pty Ltd | 74 607 497 754 |
| NGP Finance Pty Ltd | 79 629 752 969 |
| NST Investment Pty Ltd | 26 112 693 562 |
| Penrith City Automotive Pty Ltd | 31 091 198 631 |
| Penrith City Holdings Pty Ltd | 28 091 514 000 |
| Prestige Cars Pty Ltd | 59 068 818 020 |
| South East Automotive Pty Limited | 16 1 17 048 450 |
| Southern Highlands Automotive Pty Ltd | 12 095 216 961 |
| Southern Highlands Motors Pty Ltd | 91 131 107 983 |
| Southsub Pty Ltd | 20 637 081 077 |
| The Trustee for MCT Property Trust | 26 578 653 682 |
| Terry Shields Pty Ltd | 73 000 678 473 |
| Western Region Automotive Pty Limited | 72 112 718 420 |
| WFM Motors Pty Limited | 31 001 632 837 |
| Winbirra Estate Pty Ltd | 65 074 110 991 |