



MODERN SLAVERY STATEMENT
COX AUTOMOTIVE AUSTRALIA

Cox
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THE REPORTING ENTITIES AND THE CONSULTATION PROCESS

Cox Automotive Australia Pty Ltd (ACN 090 535 505) (CAA) is an Australian privately owned company with headquarters in Melbourne. CAA is part of the international Cox Automotive group, which is an international automotive service provider, with solutions that help dealers, manufacturers, fleet companies and leasing firms add value and improve business performance with inventory solutions and retail and data solutions in the digital transformation era. CAA and one of its subsidiaries, Manheim Pty Ltd (ACN 089 074 206) (Manheim) are reporting entities under the Modern Slavery Act 2018 (Cth) (Act) (together, Reporting Entities). This Modern Slavery Statement (Statement) is a joint statement that covers the Reporting Entities.

The Reporting Entities are committed to this annual Statement, released and published on the Australian Government's central register of Modern Slavery Statements in the first half of 2024. The Statement aims to identify, assess and address the risk of Modern Slavery within our business and supply chains.

The Statement has been prepared in consultation with the Reporting Entities and their subsidiaries. There has been significant discussion between the Reporting Entities' shared service functions, including within the Finance, IT, Legal and Compliance, Marketing and People Solutions teams. The Reporting Entities shared services have connected to provide feedback on the Modern Slavery risks. Specialist teams such as Business Improvement and the senior business stakeholders were also engaged for their insight into Modern Slavery risks affecting Reporting Entities.

As part of our integrated approach to the management of Modern Slavery risk, the Reporting Entities have communicated and explained our commitments and expectations regarding Modern Slavery more broadly within our business through policies and training, and we intend to enhance that communication even further in the future. The Reporting Entities and the Cox Automotive international group, share a commitment to continuous improvement in the management of Modern Slavery risk and the improvement of human rights and working conditions in all our operations and supply chains. The Legal and Compliance team has consulted Cox Automotive internationally to confirm that the Cox Automotive international group are committed to meeting the Modern Slavery legal requirements in their jurisdictions. Collaboration with the Cox Automotive international group has provided a pathway to reach compliance maturity and highlighted the initiatives to manage Modern Slavery risk with an industry viewpoint.

The Reporting Entities' Executive Risk Management Committee has diligently reviewed this Statement with a top-down view to ensure maximum consultation across the business and to provide governance. The Executive Risk Management Committee meets regularly with a focus on the enterprise level risks identified across the Reporting Entities. Progress against objectives set by each risk owner is reviewed and then the Executive Risk Management Committee provides a report on the Enterprise Risk Register to the Reporting Entities' senior management teams as well as the International Enterprise Risk Management teams.

WHAT IS MODERN SLAVERY?

Modern slavery refers to a range of serious human rights violations. The term is used to describe situations where coercion, threats or deception are used to exploit people and deprive them of their freedom. Modern slavery includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

STATEMENT ON PREVENTING MODERN SLAVERY

Modern Slavery is a crime which results in the abhorrent abuse of the human rights of vulnerable workers. The Reporting Entities are committed to acting ethically, with integrity and transparency in all its business dealings and relationships and supports the Act's principles. We will implement effective systems and controls to monitor and ensure that Modern Slavery and human trafficking are not taking place either within our own business or in any part of our supply chain, in compliance with the Act. We have published our Modern Slavery Policy on the CAA website and provide biennial training to all employees.

The Reporting Entities expect the same high standards from its suppliers, contractors, and other business partners, and as part of its contracting processes includes specific prohibitions against the use of Modern Slavery. In turn we expect our suppliers to hold their own supply chains to these high standards.



STRUCTURE

CAA is the Australian parent company of a group of companies which own and operate several businesses, brands and products in the Automotive sector across Australia and New Zealand. It is the sole shareholder of Manheim and is responsible for the governance arrangements for Manheim.

Manheim provides automotive remarketing services in Australia and has operational sites in each State and Territory of Australia.

The head office for CAA and Manheim is at 4 Gordon Luck Avenue, Altona North, Victoria. The Reporting Entities' shared services, including Finance, IT, Legal and Compliance, Marketing, Work Health and Safety and People Solutions are based at the head office.

OPERATIONS

CAA owns and operates businesses offering solutions across all pillars of the automotive ecosystem, from inventory management and reconditioning to lead management and dealer management systems, website design, photography, data insights and after-sales loyalty. CAA focuses on delivering and improving products and services to create faster vehicle transactions, enabling consumers to have an efficient online-to-offline experience.

As one of Australia's leading providers of automotive remarketing services, Manheim caters for the needs of a diverse range of industry sectors. The business provides comprehensive remarketing solutions for passenger cars, commercial vehicles, light and heavy

trucks, motorcycles, boats and recreational vehicles as well as machinery, plant and equipment. Manheim also provides specialist services to the insurance industry for the remarketing of damaged items from these sectors. Manheim holds regular trade and public auctions for passenger cars and commercial vehicles, 4WDs, damaged vehicles and trucks and machinery online and in person.


SUPPLY CHAINS

The Reporting Entities' supply chain is largely Australian based with a small number of services purchased from overseas companies. The key suppliers for the Reporting Entities include professional services, HR, marketing, insurance agents and IT providers and service providers within the transport, mechanical, storage and equipment industries. These providers include local carrier services that service our National Transport team in transporting vehicles and machinery across sites and local mechanics and repairers that service our re-marketing division in assisting with sales on behalf of our customers.

The Reporting Entities are committed to obtaining and retaining high quality goods and services at a market competitive price whilst also ensuring they are from sources which have not breached human rights. We aim to develop strong partnerships with our suppliers, based on mutual trust, understanding and respect and shared ethical values.

We expect our suppliers to adhere to business principles consistent with our own:

- (i) to ensure that their products and services are produced and delivered to comply with legislation relevant to their business; and



(ii) to ensure they adopt and implement acceptable safety, environmental, product quality, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

POLICY ON RECRUITMENT AND EMPLOYMENT

The Reporting Entities will always recruit the best person for job and will not discriminate on the basis of protected characteristics such as age, disability, gender, gender reassignment, marital or civil partnership, pregnancy and maternity, race, colour, nationality, ethnic origin, religion or belief, and sexual orientation.

The Reporting Entities have implemented a Recruitment policy and requires its employees to undertake training to understand its core principles, which are to create and sustain a positive working environment where everyone is equally valued and treated fairly with respect and dignity all times.

The Reporting Entities will adhere to the following principles in respect of our employees:

- We will treat all employees fairly and honestly. All employees will have agreed terms and conditions in accordance with legislation and will be given appropriate skills training.
- We will pay a fair wage reflecting market conditions and will always meet any national minimum wage.

- Working hours shall not be excessive and shall comply with industry guidelines and national standards where they exist.
- We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour and have a zero tolerance to modern slavery.
- Team members have the rights of freedom of association and collective bargaining. We respect the right of our team members to choose whether or not to join a trade union without influence from management.
- We will negotiate in good faith with the properly elected representatives of our employees.
- We will abide by the non-discrimination laws where we operate our business.
- We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- We have formal grievance procedures through which staff can raise personal and work-related issues.

RISK OF MODERN SLAVERY IN THE OPERATIONS AND SUPPLY CHAINS

The Reporting Entities consider the following areas as potential risks for the business:

- suppliers who are based overseas, particularly where those businesses may be in countries with less robust human rights legislation than in Australia;
- agency or contractor workers who may be vulnerable to abuse by their employer;
- general suppliers who may subcontract their services or purchase without ensuring adequate due diligence; and
- excessive working hours and breach of work health and safety obligations.

Based on an analysis of the potential risks, the Reporting Entities consider the residual risk of Modern Slavery across the Reporting Entities and the entities they own and control as low. We will monitor and address Modern Slavery risks within our internal operations through our relevant policies and practices.

ACTIONS TAKEN TO ASSESS AND ADDRESS THE MODERN SLAVERY RISKS

The risk of Modern Slavery was included in the Enterprise Risk Register, reflecting the seriousness placed by the Reporting Entities. The Executive Risk Management Committee provides essential governance framework over risk management. The risk of Modern Slavery was considered against the adopted risk methodology and assessed as being below the enterprise level risk severity and frequency threshold.



TRAINING, AWARENESS AND REPORTING

The Reporting Entities have an online learning management system combined with a robust course library. It enables targeted learning, boosts employee experience and loyalty, and protects the brand by keeping the Reporting Entities compliant with the Act.

A professional training module on Modern Slavery is included on the learning management system. This has been implemented as a mandatory module at employee induction stage, with a refresher at 2-year intervals. All existing employees are enrolled in the course and completion rates are monitored. Any concerns or questions regarding the risk of Modern Slavery practices within our operations or supply chain are reported to the Legal and Compliance team via the Compliance inbox. All reports related to the risk or instance of Modern Slavery are entered into the dedicated register and addressed based on the investigation procedure in place.

YEAR ON YEAR IMPROVEMENTS TO PROCESS

As a result of the ongoing focus on preventing Modern Slavery, the following improvements have been made:

- Conducted a desktop review of the Reporting Entities international suppliers and added those suppliers that the Reporting Entities consider to be of a higher risk, to a watchlist for further monitoring.
- Continuing to improve the Supplier Compliance Programme for new suppliers being onboarded, going above and beyond supply chain checks.
- The Reporting Entities' Executive Risk Management Committee continues to monitor the risks associated with Modern Slavery and the effectiveness of the steps undertaken in both the operations and the supply chain to eradicate any form of slavery, in line with the UN Guiding Principles.
- Actively recruiting to expand the resourcing and capability of the Reporting Entities' Executive Risk Management Committee.

- A contract register continues to be developed and expanded by the Legal and Compliance team. This requirement has been included in the Enterprise Risk Register. This allows consistency in supplier contracts reviewed by the Legal and Compliance team and an inclusion of a provision to warrant compliance to the Act where practicable.
- A Master Service Agreement has continued to be developed which includes a clause for all suppliers to understand the applicable laws and regulations including the Act and provide confirmation of their compliance.
- We will continue to review, and where necessary, take additional steps to improve our procurement framework to address the risk of Modern Slavery in our supply chain. Our current roadmap includes the following next steps:
 - Reporting Entities contracts with agency worker providers to be reviewed and refreshed by the Legal and Compliance team to include a provision warranting compliance to the Act.
 - All employment contracts to confirm Reporting Entities' commitment to the Act and will include a requirement of the same from the employees.
 - A review of all current suppliers to assess and determine whether further due diligence in respect of their supply change is required.





REPORTING ENTITIES POLICIES

The Reporting Entities monitor and address human rights issues in our operations under the relevant policies and practices. The People Solutions team has documented policies and guidance covering aspects of Australian legislation encompassing employment and providing employees with clear standards compliance with our legal obligations, including:

- The Reporting Entities' internal Code of Conduct and Modern Slavery Policy highlights the Reporting Entities' expectation that employees work to ensure that our activities reflect our commitment to respecting human rights and human-rights related laws. Employees are made aware that we do not engage in business with companies or individuals that engage in child labor, forced labor, human trafficking, or other human rights abuses and how to report any concerns.
- The Reporting Entities' Supplier Code of Conduct highlights the high standards expected from its suppliers, contractors and other business partners, including specific prohibitions against the use of Modern Slavery. The Supplier Code of Conduct is published and available on the CAA website. In turn, we

expect our suppliers to hold their own supply chains to these high standards.

- The Reporting Entities' Modern Slavery Policy outlines our ongoing commitment and approach to reducing the risk of Modern Slavery practices within our supply chains and operations. The Modern Slavery Policy is published on the Reporting Entities intranet and is published on the company website to provide guidance on support available to our people if they become aware of circumstances where someone is at risk of or affected by Modern Slavery practices.
- The Reporting Entities' Harassment and Bullying Prevention policy is in place to guide the expected ongoing level of behaviour. The Reporting Entities will always recruit the best person for the job and will not discriminate based on protected characteristics such as age, disability, gender, gender reassignment, marital or civil partnership, pregnancy and maternity, race, colour, nationality, ethnic origin, religion or belief, and sexual orientation.



DUE DILIGENCE PROCESSES

Team members: The Reporting Entities' recruitment process includes robust controls to validate the ID of any prospective employee and ensure that they have proof of Right to Work. The Reporting Entities require all its team members to undertake training to understand its core principles, which are to create and sustain a positive working environment where everyone is equally valued and treated fairly with respect and dignity all times. In addition, the Reporting Entities have in place a Recruitment Policy and a Discrimination, Harassment and Bullying Prevention Policy.

The Reporting Entities have standardised fair employment agreements to address the risk of underpaid and unpaid work and ensure work health and safety is paramount.

Suppliers: The Reporting Entities continue to assess the supply chains across the various business areas and require vendors to complete an assessment questionnaire at onboarding to indicate compliance with all applicable laws and regulations. Separately, where an IT vendor is identified as a critical vendor, they are required to complete an assessment on an annual basis to indicate compliance with all applicable laws and regulations. The Reporting Entities will continue to develop these compliance questionnaires and to seek regular feedback from suppliers to monitor supply chains.

For vendors such as Tax and Audit consultants, the Reporting Entities work with the Cox Automotive International business partners with Australian presence. These vendors have been screened and selected based on thorough procurement due diligence procedures. Finally, terms and conditions for contracts with local job agencies are drafted via the Legal and Compliance team based on the standard requirement to be compliant with the local Australian laws and regulations.

The Legal and Compliance team will from time to time outsource matters to external legal consultants and will instruct reputable firms and practitioners who are appropriately qualified and hold the relevant practising certificates. These practitioners are governed by professional bodies such as the Legal Services Board or local equivalent.

Our focus on Chain of Responsibility has driven us to engage specialist service providers. There was mandatory training delivered and there is a training register to ensure participation. The business has developed a questionnaire for Manheim Transport carrier companies to ensure they are compliant with legislation.

ASSESSMENT OF THE EFFECTIVENESS OF SUCH ACTIONS

The Reporting Entities are committed to advancing the maturity and ensuring that appropriate action is taken to identify, assess and mitigate the risks of modern slavery in our organisation and supply chains. These measures include:

- Regular review of the Enterprise Risk Register with a continued focus on identifying Modern Slavery Risks and action taken to reduce Modern Slavery Risk within the supply chain.
- Communication to all staff providing insight in how to identify Modern Slavery Risk, how to escalate and report them through the relevant channels mentioned on the Code of Conduct, Whistleblower Policy and Modern Slavery Policy.
- Regular review of the Modern Slavery register that captures any relevant reports made to the Compliance inbox by the Legal and Compliance team and escalations to the Executive Risk Management Committee.

- Biennial training on Modern Slavery to be completed by all Reporting Entities' team members. The Reporting Entities are committed to acting ethically and with integrity and transparency in all its business dealings and relationships. This training module is designed to increase awareness about all forms of Modern Slavery, the indicators of Modern Slavery, protections that are available, best practice and referral pathways within the Reporting Entities. This initiative is in line with one of the Reporting Entities' values 'Doing the right thing' and supporting the communities our businesses operate in.
- The Executive Risk Management Committee manages the Risk function, and together with the Compliance function considers and develops improved processes for compliance best practice. Any deviations or lapses are reported to the Reporting Entities' executive leadership team and/or the Executive Risk Management Committee.





This Statement was approved for and on behalf of the Reporting Entities by the Board of Directors of the Reporting Entities on 27 June 2024, the Chief Executive Officer of Cox Automotive Australia on 27 June 2024 and CFO of the Reporting Entities on 25 June 2024.

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