

Modern Slavery Statement (Australia)

SG Fleet Group Limited
ABN 40 167 554 574

December 2022

Modern Slavery Statement

A. Reporting entity

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) by SG Fleet Group Limited (ABN 40 167 554 574) and its related entities (together, “SG Fleet” or “the Company”) for the financial year ending 30 June 2022. It outlines the approach and initiatives taken by the Company and its related entities to identify and address the risks of modern slavery in its operations and supply chain. The Company has consulted its related entities during the preparation of this statement.

The statement relates to SG Fleet for the full 2022 financial year and to the acquired LeasePlan Australia Limited business (ABN 57 006 923 011 - see below) for the second half of the 2022 financial year. LeasePlan Australia Limited submitted a modern slavery statement relating to the 2021 calendar year on 30 May 2022.

The statement has been approved by the Board of Directors of SG Fleet on 28 November 2022.



Andrew Reitzer
Chairman
SG Fleet Group Limited

B. Structure, operations and supply chains of SG Fleet

1. Business Overview

SG Fleet is a leading provider of integrated mobility solutions, including fleet management, vehicle leasing and salary packaging services, with a presence across Australia, as well as in New Zealand and the United Kingdom. At the end of the 2022 financial year, the Company employed approximately 1,100 staff worldwide and had approximately 270,000 vehicles under management.

During the reported period, SG Fleet operated under multiple brands across corporate and consumer business segments: sgfleet (operating in Australia, UK and New Zealand), nlc (Australia) and, for part of the reported period, LeasePlan (Australia and New Zealand).

During the 2022 financial year, SG Fleet acquired the Australian and New Zealand businesses of international fleet management and leasing company LeasePlan Corporation NV. Under the acquisition agreement, use of the LeasePlan brand will be phased out over time. Use of the nlc brand will also be phased out during the 2023 financial year.

The acquisition of the LeasePlan businesses did not materially alter the nature of SG Fleet’s business activities or its geographical footprint. SG Fleet’s services and activities for each jurisdiction are summarised in the table below:

Australia	United Kingdom	New Zealand
<p>Provider of:</p> <ul style="list-style-type: none"> • passenger and commercial vehicle operating leases, finance leases and fleet management services for corporate and government customers • passenger vehicle novated leases and consumer finance for individuals • insurance products relating to leased and managed vehicles for corporate and government customers and for novated leases • disposal of passenger and commercial vehicles • other mobility solutions, including car share and subscription services • other vehicle-related services, such as mobility and EV consulting, 	<p>Provider of:</p> <ul style="list-style-type: none"> • contract hire, finance lease, daily rental and fleet management services for passenger and commercial vehicles for corporate and government clients • vehicle salary sacrifice services for individuals • personal vehicle contract hire for individuals and sole traders • disposal of passenger and commercial vehicles • insurance products relating to salary sacrifice leases for individuals • other vehicle-related services, such as mobility and EV consulting 	<p>Provider of:</p> <ul style="list-style-type: none"> • passenger and commercial vehicle operating and finance leases and fleet management services for corporate and government clients • disposal of passenger and commercial vehicles • other vehicle-related services, such as mobility and EV consulting

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Further information about SG Fleet’s business activities can be found on the Company’s website at www.sgfleet.com.

2. Supply Chain

SG Fleet’s operations are primarily office-based. The main categories of supply chain activities relating to or supporting the Company’s business activities are as follows:

- provision of daily rental and lease vehicles
- procurement, delivery, and disposal of vehicles
- in-life movement of vehicles
- roadside emergency breakdown services
- maintenance and repair of vehicles
- registration, fuel, toll, infringement, and accident management services
- sourcing and installation of after-market products, such as electronic devices, racking, and protective equipment for personal and commercial vehicles
- telematic and other hardware devices, and associated software
- lease portfolio funding

Other major categories of suppliers include IT, commercial property, insurance, financial, marketing and other professional services.

In Australia, SG Fleet works with approximately 10,000 suppliers, ranging from small businesses to multi-national companies. Of the Company’s suppliers, 2,797 account for more than 99% of its total spend.

C. Risks of modern slavery practices in the operations and supply chains of SG Fleet

SG Fleet aims to do business with suppliers that have similar values and ethical business practices, including those related to human rights. The Company assesses risks in its operations and supply chain through consultations with relevant internal stakeholders. Risk factors include the location of the supplier, the nature of the goods and services provided, the level of control SG Fleet has over the supplier and the Company’s understanding of the supplier’s level of corporate governance.

Following this consultation process, the Company has assessed its exposure to the risk of modern slavery and human trafficking as low as its business operations take place in countries with a relatively low prevalence of slavery. However, the Company recognises that modern slavery risks may go beyond its immediate suppliers, for example where suppliers have operations in countries where slavery and human trafficking is more prevalent, or where suppliers use raw materials in

manufacturing (for example the manufacturing of motor vehicles) where those raw materials are sourced from high risk countries.

D. Actions taken by SG Fleet to assess and address modern slavery risks

1. Policies & Governance

SG Fleet is committed to compliance with all applicable laws and standards in the sectors and jurisdictions in which it operates. The Company's corporate values of trust, excellence, collaboration and innovation underpin its culture and the way it conducts business.

SG Fleet aims to identify and mitigate the risk of modern slavery and human trafficking occurring within its supply chain and business operations. To this end, the Company maintains a set of policies and procedures that govern the way it operates. The Company's policies and procedures are aligned to its values, govern the way it operates and reflect how it manages its potential human rights issues with regard to operations and supply chain. These policies and procedures include an Employee Code of Conduct, employment screening, equal opportunity and diversity and whistle-blower programs and a Supplier Code of Conduct. Compliance with business policies and procedures are monitored through an internal audit program.

2. Supplier Code of Conduct

SG Fleet has adopted a Supplier Code of Conduct, which articulates the Company's expectations from its suppliers, including in respect of their stance on modern slavery and human trafficking, ethical business practices, anti-competitive conduct, safe and fair work conditions and environmental responsibility.

The Supplier Code of Conduct specifically states that suppliers must ensure that all work is undertaken without coercion or any form of forced, bonded, indentured or involuntary labour.

SG Fleet's standard new (and renewed) supplier agreements include an obligation to comply with its Supplier Code of Conduct or to have an equivalent policy. The Company also reserves the right to conduct ad-hoc audits on suppliers to confirm their adherence to the terms of the agreements.

3. Employees & Training

SG Fleet is committed to maintaining a safe work environment for all staff, which values equal opportunity and is free from discrimination, harassment and victimisation. Educating staff is fundamental to creating such an environment and to ensuring that potential human rights and modern slavery risks are identified and managed.

SG Fleet entities have policies and procedures concerning employment screening (including work eligibility checks), employment conditions and appropriate workplace behaviour. All staff are expected to abide by the requirements of these policies, in addition to demonstrating behaviour consistent with the Company's values. All new staff are required to complete comprehensive training in relation to SG Fleet policies (including codes of conduct), laws and regulations of each state and country relevant to an employee.

Annual 'refresher' compliance training is mandatory for all staff. Completion is monitored and tracked through an online system. Failure to complete the training within the specified timeframe is escalated to the employee's line manager.

Non-compliance with the SG Fleet Employee Code of Conduct and other policies is taken seriously. Any failure to comply with the Code of Conduct may lead to disciplinary action, which can include termination of employment.

4. FY2022 Performance

In the 2022 financial year, SG Fleet continued its endeavours to combat modern slavery by:

- reviewing its Supplier Code of Conduct;
- maintaining its requirement that suppliers comply with SG Fleet's Supplier Code of Conduct, which is to be included in new (and renewed) supplier contracts;
- continuing to conduct supplier due questionnaires that requests a copy of the relevant supplier's published mandatory or voluntary modern slavery statement or details of how the supplier mitigates the risk of modern slavery within its supply chains;
- collaborating with "preferred" suppliers to encourage the publishing of a voluntary or mandatory modern slavery statement as a means of improving the Company's visibility of suppliers' efforts to mitigate risks; and
- maintaining whistleblowing policies that facilitate reporting of risks or alleged incidents of modern slavery.

The Company acknowledged the challenges associated with suppliers providing complete and meaningful responses to its questionnaires and continued to investigate various options for improvement. For example, the Company analysed its supplier database to identify the 25% of suppliers that receive more than 99% of its spend. The Company is working closely with these suppliers to obtain more detailed responses to its questionnaire, including a copy of those suppliers' published modern slavery statements.

Case Study

During the 2022 financial year, the Company reviewed:

- customer requests to complete modern slavery related surveys or questionnaires, and requests to provide evidence of compliance with modern slavery legislation;
- reports and analysis of other organisations' efforts to comply with modern slavery legislation; and
- examples of 'best practice' modern slavery reporting.

Based on this analysis, the Company issued a tender for the provision of services capable of supporting its modern slavery assessment and mitigation activities. In total, detailed responses were invited from six organisations able to provide online survey, analysis and response capabilities related to modern slavery. The Company intends to adopt an enhanced approach to modern slavery risk by leveraging these newly available capabilities.

The proposed approach will:

- incorporate a requirement for all preferred suppliers to either publish a mandatory or voluntary modern slavery statement, or respond to the Company's online survey;
- focus on the leading suppliers, which account for more than 99% of the Company's spend; and
- analyse suppliers' responses utilising software that considers country and industry risks in its evaluation process.

The Company is confident that this revised approach will support its modern slavery assessment and mitigation efforts by yielding higher survey completion rates and more detailed responses.

E. Assessment of the effectiveness of SG Fleet's actions

1. Effectiveness of the Company's actions

Although it is very difficult to assess the effectiveness of the steps referred to above, relevant indicators include:

- the number of issues or potential issues identified by management;
- the number of notifications of risks or issues raised by staff, the public or law enforcement agencies;
- the incidence of suppliers or other participants in the Company's industry being involved in modern slavery.

SG Fleet has not received any notifications or identified any issues. However, the Company will continue to remain alert to the risk of modern slavery and human trafficking.

2. Continuous Improvement

Whilst the Company takes the view that it operates in a relatively low risk business sector and that its management and processes minimise the risk of modern slavery or human trafficking occurring, the Company is committed to further improvements and will continue to review and enhance its approach to addressing human rights risks by taking further steps.

This may include:

- continued mandatory modern slavery compliance and risk training for staff;

- mandatory disclosure of modern slavery risks by the Company's preferred suppliers, annually, along with a request that all preferred suppliers publish a mandatory or voluntary modern slavery statement;
- introduction and adoption of an industry-leading modern slavery risk assessment approach to better identify modern slavery risks in the supply chain, with a particular focus on suppliers high-risk countries and industries; and
- inclusion of modern slavery risk-based questions in due diligence assessments during the supplier contracting and on-boarding process.

F. Process of consultation with any entities that SG Fleets owns or controls

The senior management of the related entities has been consulted in the preparation, and have reviewed the content of, this statement.

G. Other relevant information

Impact of COVID-19

The impact of COVID-19 on SG Fleet's operations and supply chains during the 2022 financial year was as follows:

- a significant proportion of staff remained on a work-from-home arrangement
- demand for the products and services of the Company continued to recover after a temporary decline
- supplies from suppliers impacted by COVID-19 continued to see some disruption

The Company takes the view that these impacts did not alter its modern slavery risk profile.