



MODERN SLAVERY STATEMENT

Reporting Period: 1 July 2023 and 30 June 2024

Introduction

In this Statement, unless expressly mentioned otherwise, references to the “**NGP Group**”, refers to NGP Investments (No.1) Pty Ltd and the reporting entities set out in Schedule 1 of this Statement, 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, detailing the actions taken during the reporting period to address modern slavery risks (**Statement**).

All entities within the NGP Group are incorporated in Australia.

NGP Group opposes slavery in all forms. NGP Group recognises the importance of protecting human rights and is strongly committed to seeking to ensure that their employees, customers, those who may be impacted by their activities and those within their supply chain operations are free from all forms of modern slavery.

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. These dealerships provide a range of services, including the sale of new and used vehicles, servicing, parts supply, and consumer finance facilitation. During the reporting period, the NGP Group employed an average of 1,848 people.

Supply Chain

The NGP Group’s supply chain is primarily focused on motor vehicle and parts manufacturing and transportation. Key aspects include:

- The procurement of motor vehicles and parts from overseas facilities where motor vehicles and parts are manufactured and assembled;
- The procurement of transportation services from local contractors;
- The procurement of other services from local contractors (for example, security, vehicle detailing and cleaning).

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

Risks of Modern Slavery Practices in Operations and Supply Chain

Modern slavery practices in the operations and supply chains of companies pose significant risks, both ethically and legally to the NGP Group which include:

- *Reputational and Financial Risk:* Any involvement in modern slavery practices risks severe damage to the NGP Group and its associated entities' brand reputation and its' revenue streams.
- *Legal and Regulatory Risks:* Australia has stringent laws to combat modern slavery, and engaging in such practices can result in severe legal consequences including significant fines and civil litigation.
- *Operational Risks:* Discovery of modern slavery practices within a supply chain can lead to disruptions as the NGP Group may need to reevaluate and possibly restructure their supply chains to eliminate unethical practices diverting attention and funds from other business priorities.
- *Supply Chain Complexity:* NGP Group's operations are based wholly within Australia, a low-risk geographical region, although we acknowledge that there may be some inherent risks in our global supply chains. These supply chains can be complex and opaque and the NGP Group may struggle to identify and address modern slavery risks in these supply chains effectively.

During this reporting period, we continued to consider our supply chains and operations to identify modern slavery related risks. During the assessment process, we identified the highest risk areas as being:

- **Manufacturing:** Modern slavery risks in the manufacturing sector, as identified in OEM partners' modern slavery statements.
- **Migration Services:** Offshore labour recruitment, particularly from the Middle East and the Philippines, poses a heightened risk of exploitative practices.
- **Service Procurement:** Industries like security, detailing, cleaning, and branded goods procurement involve unskilled or migrant workers, increasing modern slavery risks.

Actions taken to address modern slavery risks, including due diligence and remediation processes.

The NGP Group has implemented the following measures to address modern slavery risks:

- **Supplier Monitoring:**
 - Regularly reviewing the modern slavery statements of major suppliers, including manufacturing partners.
 - Conducting supplier surveys to identify areas for further investigation.
- **Ethical Recruitment Practices:**
 - Partnering with a Registered Migration Agent and a specialist recruiter to ensure offshore labour recruitment is free from exploitative practices.
- **Internal Governance:**
 - Maintaining a dedicated internal working group to oversee the NGP Group's modern slavery initiatives, policies, and responses.

- Monitoring issues reported via established communication channels, such as the Whistleblower Protection Policy.
- **Training and Education:**
 - Providing ongoing education and awareness training for employees.
 - Launching a new online training module in 2024 to improve understanding of modern slavery risks and mitigation strategies.
- **Reporting Mechanisms:**
 - Offering employees and third parties channels to report suspected illegal activity or breaches of company policy anonymously.
- **Policy Framework:**
 - Maintaining and updating policies such as the Modern Slavery Policy, Whistleblower Protection Policy, and Code of Conduct, revised in June 2024.

Effectiveness of actions and next steps

The NGP Group is committed to continuously improving its processes to mitigate modern slavery risks. This includes:

- Regularly reviewing information collected from suppliers and implementing a Modern Slavery Plan.
- Conducting an annual senior management review of the Group's modern slavery response.
- Enhancing employee training with the newly launched online module to raise awareness of modern slavery risks and prevention strategies.

Process of Consultation with NGP Group

Monthly management meetings with reporting entities provide opportunities to review and address supplier-related issues.

The NGP Group recognises the complexities of a global supply chain and remains committed to identifying and mitigating modern slavery risks.

This statement was approved by the boards of each of the reporting entities set out in the Schedule.



Daniel Ryan
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 |
| N G P Essendon Pty Ltd | 73 616 1 18 051 |
| NGP Group Services Pty Limited | 25 143 438 797 |
| N G P Ingles Pty Ltd | 53 631 340 728 |
| N G P Lorimer Pty Ltd | 98 610 702 988 |
| 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 Toorak Pty Ltd | 71 608 590 361 |
| 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 |