

A large, modern, curved building with multiple levels of glass and wood paneling is situated on a hillside. The building is surrounded by dense green trees and shrubs. In the background, a residential area with houses and a golf course is visible under a clear blue sky. The scene is captured during the golden hour, with warm sunlight illuminating the building and the surrounding landscape.

# Modern Slavery Statement


Under the Modern Slavery Act 2018 (Cth)

1 JULY 2022 – 30 JUNE 2023

This Modern Slavery Statement was approved by the Board of Royal Automobile Club of Victoria (RACV) Limited ("RACV") ABN 44 004 060 833 in its capacity as the principal governing body of RACV on 13th December 2023.

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth), the contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person.

This statement is signed by Geoffrey O Cosgriff in his role as President and Chairman of RACV on 13th December 2023.



**Geoffrey O Cosgriff**  
President and Chairman  
13 December 2023



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## PART ONE:

# Our structure, operations and supply chain

This fourth Modern Slavery Statement prepared by Royal Automobile Club of Victoria (RACV) Limited (“RACV”) in accordance with our obligations under the *Modern Slavery Act 2018 (Cth)* (“the Act”) describes our efforts over FY23 in identifying, assessing, and responding to modern slavery risks in our operations and supply chains.

RACV recognises that modern slavery is a complex global issue. We remain committed to continually acting ethically and transparently in our business dealings and putting effective systems and controls in place to effectively respond to modern slavery risks within our operations and supply chains. We note the growing awareness of modern slavery risk in our business dealings and developed efforts to manage exposures in a more coordinated manner. We continue to engage with industry peers, government, civil society, customers, and suppliers to help inform our responses and evolve our approach.

### Our business

RACV is a mutual organisation, providing services to more than 2.2 million members in Victoria and a growing national customer base. RACV exists to improve lives in the areas of motoring and mobility, home, cleaner energy, and leisure.

We provide a diverse range of products and services including emergency roadside and home assistance; insurance and finance; resorts, leisure, and travel services; home trades services; towing; cleaner energy, including solar power systems; technology solutions for property information; and telematics and connected vehicle services.

### Our corporate structure

The reporting entity for the purposes of the Act is Royal Automobile Club of Victoria (RACV) Limited (ABN 44 004 060 833). RACV is the parent company that owns and controls other operating companies which together form the RACV Group. The specific entities that RACV owns and controls, and which are covered by this report, are:

- RACV Holdings Pty Ltd
- RACV Insurance Services Pty. Ltd
- R.A.C.V. Finance Limited
- Intelematics Australia Pty Limited
- RACV Investment Holdings Pty Ltd
- Club Tasmania Holdings Pty Ltd
- Arevo Pty Ltd
- RACV Solar Pty Ltd and its subsidiaries – see Table 2
- Nationwide Group Pty Ltd and its subsidiaries – see Table 2
- Property Safe Investments Pty Ltd (deregistered 26 November 2022)
- Landchecker Holdings Pty Ltd
- RACV Travel and Experiences Pty Ltd (became a wholly owned subsidiary 29 May 2023)
- Home Trades Hub Australia Pty Ltd and its subsidiaries – see Table 2 (became wholly owned 31 March 2023)

The Appendix lists entities that RACV held a non-controlling interest / investment in as at 30 June 2023.

The companies set out in Table 1 are centrally managed by the RACV executive management team.

Changes to our corporate structure in FY23 included the addition of RACV Travel and Experiences Pty Ltd and Home Trades Hub Australia Pty Ltd as 100 per cent owned subsidiaries, both of which had previously been incorporated as joint ventures with third parties. The acquisition of 100 per cent ownership in these entities did not materially impact our overall modern slavery risk profile.

**Table 1: Wholly owned subsidiaries operating under the management of RACV's executive management team during FY23**

Company	Business operations
RACV Insurance Services Pty Ltd	Distribution of RACV Home and Motor Insurance
R.A.C.V. Finance Limited	Issuing and distributing RACV Personal Loans
RACV Investment Holdings Pty Ltd	Holds RACV's investment portfolio and certain joint venture investments
RACV Holdings Pty Ltd	Holds RACV's investment in RACV Investment Holdings Pty Ltd
Club Tasmania Holdings Pty Ltd	Owens and operates RACV Hobart Hotel
Arevo Pty Ltd	Real-time journey planning
RACV Solar Pty Ltd* and its subsidiaries: <ul style="list-style-type: none"> <li>• Bedlam Enterprises Pty Ltd</li> <li>• Gippsland Heating and Cooling Pty Ltd (deregistered 26 November 2022)</li> </ul>	Distribution and installation of solar power systems
Intelematics Australia Pty Ltd*	Telematics and connected vehicle services
RACV Travel and Experiences Pty Ltd	Distribution and provision of holidays and travel experiences

Other business operations, such as towing and home trades services, are managed by their own executive management team. The companies responsible for operating those businesses are described in Table 2.

**Table 2: Controlled subsidiaries operating under their own executive management teams during FY23**

Company	Business operations
RACV Solar Pty Ltd* and its subsidiaries: <ul style="list-style-type: none"> <li>• Bedlam Enterprises Pty Ltd</li> <li>• Gippsland Heating and Cooling Pty Ltd (deregistered 26 November 2022)</li> </ul>	Distribution and installation of solar power systems
Intelematics Australia Pty Ltd*	Telematics and connected vehicle services
Nationwide Group Pty Ltd and its subsidiaries: <ul style="list-style-type: none"> <li>• Eastern Van Services Pty Ltd</li> <li>• Nationwide Roadside Services Pty Ltd</li> <li>• 134 Tow Pty Ltd</li> <li>• Nationwide Towing &amp; Transport Pty Ltd</li> <li>• Fleet Company 2017 Pty Ltd</li> <li>• Leasetek Pty Ltd</li> <li>• Truck Town Pty Ltd</li> <li>• Nationwide WA Pty Ltd</li> </ul>	Towing, transport and emergency roadside assistance services
Landchecker Holdings Pty Ltd	Technology Solutions for Property Information
Home Trades Hub Australia Pty Ltd and its subsidiaries: <ul style="list-style-type: none"> <li>• RACV Security Pty Ltd</li> <li>• Club Home Response Pty Ltd</li> <li>• Property Safe Holdings Pty Ltd</li> <li>• Property Safe (Aus) Pty Ltd</li> <li>• PropertySafe Pty Ltd</li> <li>• Property Safe Administration Pty Ltd</li> <li>• Property Safe Ltd</li> <li>• Maintenance Manager Pty Ltd</li> </ul>	Home trades services, Property services, Emergency home assistance.

\* RACV Solar Pty Ltd and Intelematics Australia Pty Ltd operated under their own executive management teams until May 2023, after which they were brought under the management of RACV's executive management team. RACV Solar Pty Ltd was subsequently incorporated in the operations of Home Trades Hub Australia Pty Ltd post the reporting period ending 30 June 2023.

## Our operations

Our operations remain broadly unchanged from FY22, consisting of:

- National operations and diverse business activities serving members and customers that range from consumers and small businesses to large enterprises.
- Seven resorts in Victoria and Queensland, two RACV Club and leisure facilities in Victoria, and a hotel in Hobart.
- A network of 25 retail stores and agencies throughout metropolitan and regional Victoria. RACV's eight agencies are operated by local businesses. Staff working in RACV's retail stores are direct employees of RACV. Staff operating in agencies operated by local regional businesses are direct employees of the operator.
- Approximately 4500 staff across our offices, resorts, retail stores and other operations (including our wholly owned subsidiaries) under applicable modern awards, enterprise agreements or common law employment contracts.

Most of our staff are permanent employees engaged on a full or part-time basis and just under 25 per cent are engaged on a casual basis. Approximately 37 per cent of our employees work in professional and administrative roles (including approximately 700 staff in our member and customer facing contact teams), and around a third are hospitality workers in our Leisure clubs and resorts.

Of the total workforce, 16 per cent were contingent workers during FY23, which has increased from FY22, and includes contractors providing some of our emergency assistance services and solar power installations across Victoria. The percentage of contingent workers in the core RACV business stands at two per cent, with most of the remainder accounted for by tow truck and roadside assistance drivers contracted to our wholly owned subsidiary Nationwide Group. Around nine per cent of staff are employed on migrant working visas, over half of whom are hospitality staff.

## Our supply chain

In FY23 RACV sourced from over 4,000 suppliers a broad range of goods and services of which approximately 97 per cent came directly from local Australian suppliers. Our supply chains have not materially changed from FY22.

Most of our procurement activity occurs in our leisure business and our home and roadside assistance services.

We generally source goods either directly from local producers or through distributors and service providers operating in Australia. Goods supplied to us are manufactured (wholly or in part) in countries in Europe, North America, East Asia and Southeast Asia from primary resources grown or supplied from many regions of the world.

Some suppliers, predominantly in the nature of marketing and information technology (IT) support services, are located offshore in the European Economic Area, Hong Kong, India, Sri Lanka, New Zealand, North America, the Philippines, Singapore, South Korea, Vietnam, and the United Kingdom. In FY23, we also had supply relationships with a small number of suppliers either based in China or with deeper supply chain links to manufacturing in China.

Major categories of spend in FY23 included software providers; fleet services; professional services (including legal, audit and financial advisors); recruitment and Human Resources (HR) services; advertising and media; construction equipment and services; and IT services. The largest numbers of suppliers in FY23 were found in the categories of fleet services; construction services and equipment; accommodation services; ticketing services; food and beverages; software support; professional services; and dry goods.

Maintaining mutually beneficial, long-term relationships with key suppliers is a priority and creates potential for more collaborative modern slavery responses. We have many such relationships with suppliers, often small and family businesses in the communities in which we operate.



**PART TWO:**

# Risk of modern slavery practices



No actual or suspected instances of modern slavery were identified in our operations in FY23. Whilst RACV is not aware of any actual modern slavery in our supply chains, the diversity of our businesses means that there is an inherently higher risk of modern slavery in certain categories of supply, as reflected below.

## Operational risk

We have assessed our operational risk exposure to modern slavery as low to moderate which reflects the nature of RACV's operations, the regulatory environment, our workforce composition and our internal controls and employee safeguards.

### Hospitality services in our leisure business

A significant proportion of our overall workforce is employed in our leisure business in hospitality roles. As many hospitality sector jobs have a lower barrier to entry and are filled by low skilled workers and sometimes by migrant workers, we recognise the need for vigilance in recruitment to ensure the elevated inherent risk (relative to other aspects of RACV's operations) is appropriately monitored and mitigated.

RACV applies the following to address these potential risks:

- Pre-employment checks.
- Induction training.
- Provision of specific modern slavery training and awareness.
- Operation and regular review of whistleblower policies and grievance procedures.
- Regular internal review through our risk and controls mechanisms.
- Compliance with externally operated WorkSafe audits.

## Recruitment partners

As monitoring workforce treatment is more challenging when an intermediary is involved, and there are elevated risks associated with contracted workers in lower skilled roles including cleaning, security and gardening, recruitment agencies that we use to source staff are subject to at least the same controls as our other suppliers and engagement is centrally controlled by a talent acquisition team.

## Supply chain risks

During the reporting period we experienced a slight increase in spend associated with suppliers in high-risk categories. Our risk assessment identified just under 1,000 suppliers (a significant proportion of which are low value or non-recurring spend) with inherently elevated modern slavery risk due to their operations across the following high-risk categories and/or supply of goods originating from high-risk locations:

### Industry categories

- Harvesting fresh produce in Australia.
- Recruitment agencies.
- Building and facilities services comprising cleaning, grounds maintenance and security.
- Home maintenance and emergency assistance services.
- IT support and managed services.

## Goods categories

- Food items, including rice, fish, and products derived from cocoa.
- Fresh produce.
- Personal protective equipment.
- Garments and apparel.
- Solar panels, inverters and batteries.

## Solar and batteries

We acknowledge, and continue to be committed to effectively responding to, widespread concern associated with solar and renewable energy products including the source materials used in batteries. We also recognise the challenge of balancing our contribution to sustainability improvements with concerns about serious human rights abuses. RACV is monitoring local and international developments in this area, including potential implications of the Uyghur Forced Labor Prevention Act in the United States upon supply bound for Australia. We are encouraged to note that broader industry awareness and acknowledgement of the challenges inherent in the renewable energy supply chain is driving a more co-operative effort to address underlying issues, and we continue to work with customers, suppliers, industry bodies and government in this regard. This continues to be a focus area for RACV in FY24 and in the future, most applicable to the solar operations of our wholly owned subsidiary, Home Trades Hub Australia Pty Ltd.

Following on from issues of concern identified in FY22 in our solar supply chains, including an insufficient level of information to satisfactorily exclude linkages to Uyghur forced labour, we remain engaged with affected suppliers in their ongoing efforts to address our concerns, and encourage all solar suppliers to provide evidence of policies and processes in place to combat modern slavery risk. During FY23 requests for information of this nature were regularly distributed to suppliers and will continue to be utilised as a key part of our risk management approach.

The RACV Board and Executive Leadership team remain informed and engaged on the outcomes of these ongoing steps being taken to mitigate risk.

Due diligence in the form of supplier assessments issued during FY23 (research and analysis of the publicly available information, tailored supplier self-assessment questionnaires, and subsequent supplier engagement) has not identified significant concern in relation to our solar and battery suppliers potentially causing, contributing or otherwise being directly linked to modern slavery. We continue to monitor this area, given its inherently elevated risk profile.

## Cleaning and laundry

RACV engages a significant number of cleaning staff to clean our offices, clubs and resorts. In addition we utilise laundry cleaning services throughout our club and resort network. This industry usually sees a significant portion of workers from lower skill and sometimes migrant backgrounds due to lower barriers to entry. As such we are cognisant of the increased modern slavery risk in our supply chain for cleaning and laundry services. We continue to monitor modern slavery risks of our suppliers via supplier lifecycle management and environmental scanning.

During FY23, our environmental scanning process identified a publicised instance of worker exploitation involving one of RACV's suppliers in this industry. Using our redress principles, we contacted the supplier and have maintained dialogue with them to satisfy ourselves of resolution of the instance, their commitment to prevent recurrence, and the steps taken by the supplier to address the root cause of the issue via implementation and monitoring of relevant policies and procedures.

## Personal protective equipment

Cleaners and housekeepers in our leisure business use personal protective equipment (PPE) daily. Cognisant of allegations made during FY22 of forced labour in the supply chain for PPE, including the manufacture of rubber gloves in high-risk countries such as Malaysia, we assigned this industry category the highest initial risk rating in our model, which remained at the highest inherent risk rating for FY23. We continue to monitor suppliers for any potential connections to identified high risk manufacturers.

## Harvested produce and seafood products

RACV recognises the risks posed by our procurement of a wide range of food products, including fresh produce harvested from Australia for the hospitality facilities at our leisure centres, and applies a degree of modern slavery due diligence commensurate with this risk profile.

As seafood is one of the top seven products at risk of modern slavery imported into G20 countries (due to reliance on workers from low socioeconomic backgrounds, exploitative working conditions and practices such as confiscation of worker documents<sup>1</sup>) we have investigated the geographical origin of the seafood we source for our leisure business. At least 79 per cent of our seafood supply chain originates in Australia and New Zealand. We continue to have a small exposure to seafood sourced from the higher-risk regions of Southeast Asia. We have applied due diligence to our primary suppliers in this sector and they have accepted the modern slavery clauses in our updated supply agreement.

<sup>1</sup> See further at: <https://www.walkfree.org/global-slavery-index/findings/importing-risk/>



## PART THREE:

# How we assess and manage modern slavery risks

## Modern Slavery Risk Assessment Model

Ensuring our methodology and inputs remain up to date, in FY23 we updated our Modern Slavery Risk Assessment Model using inputs from the latest Global Slavery Index 2023 (“GSI”). These inputs included key risk factors such as the country of manufacture or service delivery, industry categorisation, and higher risk business models, such as involvement in an industry reliant on subcontracted labourers or labour hire agents.

We use these factors to help assess risk in our own operations, and to assign an initial risk rating of low, medium, or high to each of our suppliers. The rating informs the prioritisation of our management of modern slavery risk using tools such as due diligence, additional contract clauses (agreement terms) and ongoing supplier risk management.

## Due diligence

Following on from our enhanced due diligence efforts over suppliers in high-risk categories in FY22, we focused our efforts on using our redress principles to successfully engage with those suppliers with outstanding queries from the due diligence process or arising from regular media monitoring activities.

Engagement included suggested enhancements to address suppliers’ non-compliance with modern slavery reporting requirements (e.g. unendorsed modern slavery statements not yet published on The Australian Government’s online register for Modern Slavery Statements and statements published with potentially incomplete information).

During the reporting period we successfully launched a new procurement platform to enhance supplier lifecycle management and help to automate key processes

such as initial and ongoing supplier engagement, recording and tracking of supplier obligations, and supplier due diligence. This has allowed for a much broader application of modern slavery due diligence via the inclusion of a full suite of mandatory modern slavery questions in due diligence questionnaires completed by suppliers during onboarding, on contract renewal and on a pre-defined recurring basis. The new platform also enables broader environmental, social and governance (ESG) due diligence using negative sentiment and other forms of available information via Moody’s Orbis platform.

As part of our centralisation of procurement activities, our new platform will be rolling out to our wholly owned subsidiaries during FY24. Those subsidiaries to be transitioned to the new platform include Nationwide and Home Trades Hub Australia. Centralisation of this process will enhance supplier engagement, risk management, contract management and record keeping for these entities.

## Contract provisions

RACV has in place a Goods and Services Agreement template (‘Agreement’) which now places the following obligations on our suppliers:

- Suppliers must warrant that they are compliant with modern slavery laws and regulations and that none of their employees or subcontractors have been convicted or investigated for modern slavery offences.
- Suppliers must agree to maintain appropriate records about their risks of modern slavery, compliance with modern slavery related legislation and information to assist RACV in mapping our supply chain.
- Suppliers agree to submit to modern slavery related audits conducted by RACV or our appointed representative.

- Suppliers that use subcontracted labour or services are required to ensure that subcontractors and related employees comply with modern slavery legislation, to ensure consistent standards are cascaded down our supply chain.

The Agreement allows that RACV may terminate the Agreement if the supplier has engaged in modern slavery or has not complied with modern slavery related legislation.

In FY23, the majority of new suppliers to RACV were onboarded under the Agreement. With the change to the corporate structure and rollout of the new procurement platform over FY24 we expect to see the application of RACV terms to progressively be extended to our wholly owned subsidiaries.

RACV understands that contractual provisions are only part of an overall response to modern slavery, nevertheless it remains our intention to increase supplier adoption of the Agreement.

## Our governance and ways of working

### Behavioural standards and raising concerns

No changes were made in FY23 to our previously reported policy framework and mechanisms for raising concerns. No concerns related to worker exploitation or modern slavery were raised in FY23 via those mechanisms.

During FY23, RACV refreshed its organisational values, adding 'Care' as one of four core values by which the company conducts its business, and embedding it as what all staff seek to do every day for all who interact with us.

Employee awareness and acknowledgment of RACV's behavioural policies is completed periodically and a training program for new and existing employees on workplace related risks is completed annually. The policies are:

- RACV Code of Conduct
- Fair Treatment Policy
- Health, Safety and Wellbeing Policy
- Diversity Equity and Inclusion Policy
- Hours of Work Policy
- Fitness for Work Policy
- Flexible Work Arrangements Policy
- Employee Assistance Policy
- Whistleblower Policy
- Complaints Disputes and Grievances Policy

Concerns may be raised directly with managers, line managers and RACV's People and Culture function under the Complaints, Disputes and Grievances Policy; directly with People and Culture under the Fair Treatment Policy; via the RACV Whistleblower Investigation Officer, or anonymously with FairCall, RACV's externally managed whistleblowing reporting service under the Whistleblower Policy.

These policies and reporting mechanisms are subject to regular review for accessibility and suitability.

In FY23 a number of policies listed above including RACV Code of Conduct, Fair Treatment Policy, Whistleblower Policy and Complaints, Disputes and Grievances policy have been reviewed for opportunities to further reflect and reinforce the principles of modern slavery risk management and avoidance of workforce exploitation. Recommended changes will be considered as part of the next scheduled review of each of these policies.

### Risk Management Framework

One of our objectives in FY23 was to enhance our ability to record, manage and report modern slavery risk utilising more sophisticated tools. In FY23, we implemented the recording of modern slavery concerns and incidents using our GRC platform. This new method of managing modern slavery and workforce exploitation incidents identified in our supply chain allows for formalised raising and tracking of management responses to these incidents.

A regular cadence of risk reviews and reporting to RACV executive and Board, including modern slavery risks and controls, continued throughout FY23.

### Modern Slavery Risk Management Guidance

Internal guidance was developed in FY22 to support RACV's modern slavery risk management by assigning roles and responsibilities and setting out our principled and practical approach to risk identification, assessment and treatment by reference to:

- A focus on risk to people.
- Using the United Nations (UN) Guiding Principles on Business and Human Rights approach of analysing exposure in terms of whether we are 'causing', 'contributing' or 'directly linked' to risks of modern slavery.
- The potential for better outcomes where we have greater commercial leverage.
- Rewarding third parties that engage with our due diligence process and display candour in their assessment of risk.
- An agile, adaptive, and balanced approach to respond to the evolving landscape of modern slavery risk.

The modern slavery guidance has since been refreshed over the FY23 period, ensuring that RACV's approach to modern slavery risk management is consistent with the Board's stated risk appetite for conduct and compliance risk and third-party risk.

### Modern Slavery Risk Management Audit

In FY22, an effectiveness audit of our modern slavery risk management process and controls was conducted by an external party. The findings, which noted a strong risk management foundation, were reported to the Audit and Compliance Committee of the Board. All management actions associated with these audit findings were addressed and closed out over the FY23 period to further enhance modern slavery risk management.

## Education and training

Our previously reported commitment to implement modern slavery training and capacity building for our employees was met by delivering modern slavery training in FY23 to 130 employees with roles that are critical to our response to modern slavery. RACV worked with external training partners to design and implement an online modern slavery training module as part of our suite of mandatory compliance training to select cohorts of staff, allowing automated tracking and monitoring of completion and more comprehensive and efficient delivery of modern slavery training.

The training addresses:

- Guidance on what types of behaviour is considered to be modern slavery and distinguishing modern slavery from other forms of labour exploitation, to assist staff in identifying modern slavery in their day-to-day roles.
- Contextualising the prevalence of modern slavery, including that modern slavery happens in Australia.
- Indicators of modern slavery, with a focus on identifying suspicious employment practices and vulnerable workers.
- Practical actions that team members can take to raise and/or deal with concerns.
- Reporting obligations under the modern slavery act.

In FY24 we expect to offer this online training to RACV's 100 per cent owned Subsidiaries.

## Redress principles

Our redress principles, unchanged from FY22, preference working with suppliers to address risk where practical to do so. RACV is prepared to exercise rights of termination in appropriate cases. RACV may suspend procurement of goods or services from a supplier pending demonstration that the supplier has addressed the identified risks, or a genuine commitment to doing so.

RACV may engage, or require the supplier to engage, an independent third party to audit the supplier and certify to remediation of identified risks.

Our redress principles have been in active use during the FY23 reporting period with several suppliers where potential risk factors have been identified through our due diligence processes, environmental scanning results and due diligence outcomes. During this reporting period we have communicated with several suppliers using the redress principle to provide guidance where necessary. Examples of where redress principles have been used include:

- Addressing Modern Slavery Statement non-compliance. For example, unendorsed modern slavery statements not yet published on the Modern Slavery government register and incorrectly labelled statements published.
- Actively engaging with suppliers where worker exploitation instances have been identified, to address opportunities for improvement to ensure there is no reoccurrence.

## Industry collaboration

To develop a deeper understanding of better practice in relation to addressing modern slavery and policy development, RACV engaged with several external stakeholders during the reporting period, including Non-Governmental Organisations (NGOs), academic bodies, and market consultants. Knowledge from these collaborations helped improve aspects of the supplier onboarding due diligence model used to perform modern slavery risk assessment and helped us to understand developments in modern slavery response practices.

We expect to continue collaborative engagements and actively seek opportunities to engage in industry dialogue to continually improve our modern slavery response.

## Media scanning, resource access and distribution

Toward the end of FY22 we initiated and continue to produce a quarterly bulletin which is circulated to key management summarising news articles, press releases and policy changes, with a focus on risks in the Australian labour force and risks relating to products in our supply chain and countries from which we import goods.

A central repository for modern slavery related material established on the RACV intranet is regularly updated to further our objective of embedding our modern slavery response into RACV's day-to-day operations. This includes training packs and videos, our Modern Slavery Risk Management Guidelines, quarterly bulletins, and other useful information.



## PART FOUR:

# Measuring the effectiveness of our response

In previous reporting we declared our commitments for the FY23 reporting period and outlined a number of key performance indicators. The table below notes where in this statement our progress is recorded.

FY22 Commitment	Key Performance Indicator	Progress
Continue to develop the capability of risk and control owners to identify and manage modern slavery risk.	Training and capacity building of our people about modern slavery issues.	See <a href="#">Education and training</a>
Broaden and deepen responsibility for managing modern slavery risk across the RACV Group and embed these responsibilities into RACV's risk management framework.	Level of engagement of senior risk and control owners responsible for managing modern slavery risk.	See <a href="#">Risk Management Framework</a> and <a href="#">Media scanning, resource access and distribution</a>
Improve our tools to identify and receive complaints about modern slavery risk.	The level of awareness of grievance and whistleblowing procedures for workers.	See <a href="#">Behavioural standards and raising concerns</a> and <a href="#">Education and training</a>
Mature the range of responses to modern slavery risk.	Effectiveness of controls relating to modern slavery risk through a scheduled program of oversight by the RACV risk function.	See <a href="#">Risk Management Framework</a> and <a href="#">Modern Slavery Risk Management Audit</a>
Staying connected to credible external sources of high-quality modern slavery risk information and research.	Maintenance of the supplier risk model using 2023 Global Slavery Index (GSI) and ongoing media monitoring and reporting.	See <a href="#">Modern Slavery Risk Assessment Model</a> and <a href="#">Media scanning, resource access and distribution</a>



FY22 Commitment	Key Performance Indicator	Progress
<p>Enhancing our ability to recognise, record, manage and report modern slavery risk through more sophisticated tools for risk screening and supplier lifecycle management, as well as expanding modern slavery training as necessary to build specific capabilities of key personnel.</p>	<p>Implementing an online training and capacity building course of our people about modern slavery issues and integration of Orbis platform to enable ESG risk assessment and negative sentiment monitoring.</p>	<p>See <a href="#">Education and training</a> and <a href="#">Due diligence</a></p>
<p>Exploring how procurement and purchasing practice can avoid or lessen supply chain risk factors.</p>	<p>Implementation of the new procurement platform to enable management and monitoring supplier lifecycle risks.</p>	<p>See <a href="#">Due diligence</a></p>
<p>Continuing to leverage long-term supplier relationships with suppliers with the objective of appropriately addressing identified concerns and monitoring progress with agreed risk mitigation activities.</p>	<p>Activation of the redress principles as part of the due diligence process and environmental scanning results.</p>	<p>See <a href="#">Due diligence</a>, <a href="#">Redress principles</a> and <a href="#">Media scanning, resource access and distribution</a></p>



## PART FIVE:

# Looking ahead

To maintain our modern slavery awareness and response capability commensurate with the global risk, which continues to evolve, we expect in FY24 and FY25 to focus effort in the following areas:

- Staying connected to credible external sources of high-quality modern slavery risk information and research.
- Continuing to leverage long-term relationships with suppliers with the objective of appropriately addressing identified concerns and monitoring progress with agreed risk mitigation activities.
- Expanding enhanced procurement practices to wholly owned subsidiaries as part of the procurement platform rollout.
- Continuing to mature our range of management responses available to mitigate identified modern slavery risks.
- Engaging with peers, industry consultants and other organisations to help inform our preparations for potential changes to our obligations under the *Modern Slavery Act 2018*, stemming from recommendations published in FY23.

**PART SIX:**

# Consultation with controlled entities and other relevant information

RACV consulted with owned and controlled entities in the preparation of this Statement, to assess the risks of modern slavery that may be present in their operations and supply chains, and in applying its modern slavery response throughout FY23.

Responses to RACV's enquiries were overseen by a representative of each company's senior management team. RACV also engaged with the senior management teams of these companies in preparing this Statement.

We are developing action plans with each owned and controlled entity to continue to operationalise responsibilities, including incorporation of modern slavery clauses into supplier contracts and provision of comprehensive training to employees.

RACV also specifically consulted with the board of RACV Solar Pty Ltd in relation to the due diligence relating to solar and battery suppliers.

**APPENDIX**

## RACV list of entities with non-controlling interest

In addition to our owned and controlled entities detailed above at Part one, RACV also held non-controlling interest in the following entities as at 30 June 2023:

- Insurance Manufacturers of Australia Pty Limited
- Australian Motoring Services Pty Ltd
- Club Assets Pty Ltd
- Club Assist Corporation Pty Ltd
- RACV Travel and Experiences Pty Ltd (became wholly-owned subsidiary 29 May 2023)
- HSC Home Security Pty Ltd (sold 31 March 2023 as part of the restructure of the HTHA Group companies)
- Vehicle Repairhub Pty Limited
- Deep Blue Company Pty Ltd
- Real Estate Agent Select Limited (New)
- JET Charge Pty Ltd (New)
- Before you Bid Pty Ltd (New)
- Designer Journeys Pty Ltd (New)
- Vendor Compare Pty Ltd trading as PropTech Labs (New)
- Narrabundah Technology Holdings Pty Ltd



Level 7, 485 Bourke Street  
Melbourne Victoria 3000

Royal Automobile Club of Victoria  
(RACV) Limited  
ABN 44 004 060 833

[racv.com.au](http://racv.com.au)

**RACV**