



**Polaris Sales Australia Pty Ltd (ACN 088 081 949)**

**Modern Slavery Statement**

**2022**

**Financial year**

1. This modern slavery statement relates to Polaris Sales Australia Pty Ltd (**Polaris**) for the financial year beginning 1 January 2022 and ending 31 December 2022 (**Reporting Period**).
2. We are a *reporting entity* under the *Modern Slavery Act 2018* (Cth) (the **Act**), and accordingly give the Minister this modern slavery statement (**Statement**) under section 13 of the Act.
3. This Statement sets out the steps that we have taken and will be taking to ensure that business practices that compromise fundamental human rights, such as slavery, trafficking in persons and child labour are not taking place in our own business or in our supply chains.

**Introduction**

4. We are committed to a programme of continuous improvement in our business practices to combat modern slavery in our supply chains and in our business. It is our policy to conduct all business ethically and in accordance with the Act, as amended from time to time.
5. We are committed to acting ethically in all our business dealings and relationships wherever we operate, and to implement and enforce effective systems to counter modern slavery practices. We will uphold all laws relevant to countering modern slavery in all the jurisdictions in which we operate.

**Structure, business and supply chains**

6. We are owned by Polaris Industries Inc. (**Polaris Group**) through its subsidiaries.
7. For more than 60 years, the Polaris Group has been making high-quality, breakthrough products as the global leader in powersports, Polaris Inc. pioneers product breakthroughs and enriching experiences and services that have invited people to discover the joy of being outdoors since our founding in 1954. Polaris' high-quality product line-up includes the Polaris RANGER®, RZR® and Polaris GENERAL™ side-by-side off-road vehicles; Sportsman® all-terrain off-road vehicles; military and commercial off-road vehicles; snowmobiles; Indian Motorcycle® mid-size and heavyweight motorcycles; Slingshot® moto-roadsters; Aixam quadricycles; Goupil electric vehicles; and pontoon and deck boats, including industry-leading Bennington pontoons. Polaris enhances the riding experience with a robust portfolio of parts, garments, and accessories. Proudly headquartered in Minnesota, USA, Polaris serves more than 100 countries across the globe. In recent years, the Polaris brand has expanded beyond Powersports into adjacent markets, like commercial and military vehicles, where the brand can add value. Today, Polaris offers a diverse portfolio of best-in-class brands.

8. The Polaris Group is headquartered in Medina, Minnesota, USA and is listed on the NYSE. It employs approximately 16,000 employees and serves 100+ countries.
9. Our head office is in Melbourne, Australia and during the Reporting Period, we employed approximately 50 people.
10. We are organised into three businesses:
  - (a) Off-Road Vehicles (ORV) and Snowmobiles;
  - (b) Motorcycles; and
  - (c) Part, Garments & Accessories
  - (d) Global Adjacent Markets.
11. We own or control Polaris Sales New Zealand.
12. Our business activities include the importation, distribution, sales and marketing of Polaris vehicles and Indian Motorcycle in Australia & New Zealand. We do not manufacture any of the Polaris and Indian Motorcycle products in Australia or New Zealand.
13. Our suppliers are Polaris Industries Inc. and its subsidiaries, which operate globally. In a small number of cases, we may purchase parts and accessories from other local suppliers which are based in Australia and New Zealand.
14. We also engage other service providers who assist with our business operations including IT contractors, recruitment agencies and third party commercial real estate, cleaning and office services. These third parties are based in Australia.

### **Risks of modern slavery**

15. The risks of modern slavery in our operations and supply chain in Australia are low. Our service providers are all located in Australia where there is an overall low modern slavery geographic risk. The Polaris Group manages manufacturing and has significant processes and controls to identify and address modern slavery risks in the supply chain and business operation.

### **Assessing and addressing modern slavery risks**

#### Our policies on slavery

16. We have policies in place that mitigate the risk of modern slavery in our operations and supply chains.
17. Our employees are required to comply with the Polaris Code of Conduct (**Code**), which is a global document issued by the Legal, Ethics and Compliance Department. The Code informs employees that if they encounter a situation that might have ethical implications, it is important to alert someone immediately. This would include modern slavery violations. The Code suggests that talking it over with the employee's manager is a good first step. If that is uncomfortable, employees are encouraged to discuss the matter with Human Resources or to contact the Corporate Legal Department or our Compliance Officer and breach of the Code may result in disciplinary action for the relevant employee.
18. Specific contact details are provided within the Code for:

- (a) Sr. Director, Internal Audit;
  - (b) Chief Financial Officer;
  - (c) Chair of the Audit Committee;
  - (d) General Counsel; and
  - (e) Global Head of Ethics & Compliance.
19. In addition, employees can:
- (a) call the Polaris Business Ethics Hotline which is available 24 hours a day, 365 days a year. The Hotline is managed by an independent third-party provider (EthicsPoint) whose trained representatives will ask specific questions about the situation and submit a report to us for investigation. Each call is assigned a reference number so the employee can provide additional information or check on the status at any time; or
  - (b) complete an Online Report by visiting our external, secure server managed by Ethics Point. Employees can submit an online report by accessing the “Reporting Violations” link on our company intranet or [www.ethicspoint.com](http://www.ethicspoint.com). Employees complete a form that enables us to investigate and take appropriate actions; or
  - (c) contact the Polaris Sales Australia Managing Director or Human Resources.
20. If an employee reports in good faith a potential breach of the law or Code and if they cooperate in a company investigation, they are expressly protected against retaliation, harassment, or discrimination.
21. We are not aware of any report either internally or to Ethics Point during the Reporting Period relating to modern slavery.

#### **Assessing effectiveness of actions**

22. Ensuring that modern slavery practices are not taking place in our business and supply chains is and will always be a work in progress since we will regularly conduct due diligence exercises and risk assessments of our suppliers in relation to modern slavery prevention practices. Where such exercises and assessments suggest a risk of modern slavery, we will request the relevant supplier to investigate and redress where necessary, and to update us accordingly. Where a supplier fails to satisfactorily redress a risk area, we may decide to cease using the supplier.
23. We will continually monitor the effectiveness of our modern slavery practices and controls under the supervision of the Corporate Legal and Ethics Team and the Global Head of Ethics & Compliance.

#### **Future actions**

24. We intend in the coming financial years to take the following steps in respect of our policies, in order to improve our modern slavery control framework:
- (a) To review all relevant policies to see whether it is appropriate to refer directly to modern slavery issues; and

- (b) To consider the inclusion of a specific modern slavery clause in Polaris Standard Contracts and local suppliers' Terms and Conditions.

25. We are committed to ensuring that there are no modern slavery violations in our supply chains or in any part of our business operations.

Due diligence processes for modern slavery prevention

26. Within the coming financial years, we will review our due diligence exercises that are conducted in the process of selecting suppliers to cover the question of modern slavery, in order to assess how suppliers manage the risk of modern slavery in their operations and supply chains.

Steps taken to assess and manage any risks

27. Our 2023 Compliance and Governance Action Plan includes considering what steps we should be taking to assess which parts of our business and supply chains (if any) have a risk of modern slavery taking place, and the steps we will need to take to assess and manage that risk.

Training

28. In furthering our commitment to modern slavery compliance, our 2023 Action Plan will include a consideration of what modern slavery compliance training is required and should be made available to our employees, and then ensuring that such training is carried out especially for the Management Team at Polaris Sales Australia.
29. Our Managing Director for Polaris Sales Australia & New Zealand received a briefing on modern slavery requirements of the Act prior to approving this Statement.

**Consultation with entities we own or control**

The Polaris Sales New Zealand subsidiary is wholly owned by Polaris Sales Australia Pty Ltd with the same Managing Director accountable for both operating business entities.

This statement is made pursuant to the Act and has been approved by the Directors for Polaris Sales Australia Pty Ltd on 8 August 2023.

Signed on Behalf of the Directors of Polaris Sales Australia Pty Ltd

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**Alan Collins**

**Managing Director**

**Polaris Sales Australia and New Zealand Pty Ltd**

8/8/2023