



**ALTomonte HOLDINGS PTY LTD**

**MODERN SLAVERY STATEMENT 2020**

## **INTRODUCTION**

The Alto Group is one of Australia's largest privately owned automotive dealership groups, with dealerships across Sydney and the Central Coast of New South Wales. In this, our first mandatory Modern Slavery Statement, we report on the steps we have taken to comply with our obligations under the Modern Slavery Act.

## **THE REPORTING ENTITY**

This report is prepared by Altomonte Holdings Pty Ltd ACN 000 821 910 which is the holding company for the Alto Group's trading entities, consisting of:

- 7 subsidiaries that between them hold 14 motor vehicle franchises,
- 2 subsidiaries that operate in the finance area,
- 7 subsidiaries that own properties in retail, commercial, industrial, residential and rural areas,
- 2 subsidiaries that conduct farming operations, and
- 1 building company.

## **STRUCTURE AND OPERATIONS**

The companies in the Alto Group are wholly owned subsidiaries of Altomonte Holdings Pty Ltd and are all Proprietary Limited corporations. The Alto Group employs 566 staff across its operations.

As part of its operations Alto Group undertakes the following activities, all of which are conducted in NSW:

- **Motor Vehicle Operations:**  
conducting showrooms for the sale of new and used motor vehicles, motor vehicle servicing and repairs, panel and smash repairs, vehicle financing and insurance, and the sale of motor vehicle parts and accessories.
- **Finance Operations:**  
provision of finance and finance broking services to customers.
- **Property Operations:**  
owning and maintaining a range of retail, industrial and commercial properties for lease to Alto Group companies for their operations, and to third party tenants.
- **Farming Operations:**  
conducting mixed farming operations at locations in rural NSW, including a thoroughbred horse stud at Corumbene, Dunedoo, mixed farming and grazing of cattle and sheep, broadacre cropping of wheat, sorghum, cotton, and other crops at Dunedoo and on the Liverpool Plain area of NSW.
- **Building Operations:**  
providing building and property maintenance services to companies within the Alto Group.

## **SUPPLY CHAINS**

The principle activity of the Alto Group is the operation of new motor vehicle franchises. The principle suppliers to the Alto Group are manufacturers and importers of new motor vehicles and parts, known in the industry as Original Equipment Manufacturers (“OEM’s”). All the Alto Group’s OEM’s import vehicles from overseas manufacturers, including the Volkswagen Group (Audi, Volkswagen and Skoda), Toyota, Mitsubishi, Honda, Hyundai, Jaguar/Land Rover and Isuzu. These manufacturers are based in Germany, Japan, South Korea and the United Kingdom.

All other goods and services used by the Alto Group in its operations are sourced directly from Australian firms, and include spare parts, oils and lubricants, paints, tyres, furniture and fittings for its premises, services including detailing and cleaning, and building maintenance including plumbing and electrical services, air conditioning and fire prevention. Professional services are supplied from legal, accounting and consulting firms. Alto Group also uses computers, mobile phones, stationery and other office supplies in its operations.

## **THE RISKS OF MODERN SLAVERY PRACTICES TO ALTO GROUP’S OPERATIONS**

The Alto Group conducts all its operations within Australia. It is subject to Australian Law, including Industrial and Workplace laws, and endeavours to ensure that its operations are at all times conducted in accordance with those laws. By doing so we consider that there is a minimal risk of any of Alto Group’s operations resulting in any modern slavery practices and we have not identified any such direct cause.

Alto Group’s principle suppliers, the OEM’s, are franchisors to the Alto Group. Alto Group franchisees are not able to influence these supply chains and there is no risk that the Alto Group’s operations or actions in these supply chains could contribute to modern slavery.

Alto Group does however recognise that there is a risk that its operations may be linked to modern slavery practices at parts of our supply chain that we are not directly linked to. These may include the mining of conflict minerals used in batteries and electronic components of vehicles, or in the production of raw materials used in their manufacture.

## **DUE DILIGENCE, REMEDIATION AND ASSESSMENT**

During the reporting period Alto Group has undertaken a high level review of its suppliers.

We have obtained from our OEM's copies of their Modern Slavery Statements and satisfied ourselves that these suppliers are aware of the risks of modern slavery practices in the supply chain, and that they are committed to implementing policies and procedures to address these risks.

Alto Group has published its Whistleblowers Policy that provides for any employee, associate or supplier of an Alto Group company to safely and confidentially disclose concerns that they may have about any suspected incidence of modern slavery, and for those disclosures to be properly investigated.

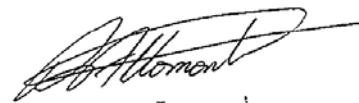
The Board of Directors of Altomonte Holdings Pty Ltd requires a report from the Group Corporate Counsel to update the Board on the Alto Group's ongoing response to its modern slavery obligations, so that it can assess the effectiveness of that response.

## **CONSULTATION WITH GROUP ENTITIES**

All Alto Group entities share common directors. The Group Managing Director is directly involved in the management of each entity, as is the Group CFO and Corporate Counsel. Alto Group also conducts a group wide accounts payable system. This enables all Group entities to be involved in the response and for any particular risk applicable to a Group entity to be identified and appropriately assessed.

## **ENDORSEMENT BY ALTOMONTE HOLDING'S BOARD OF DIRECTORS**

This Statement has been endorsed by the Board of Directors of Altomonte Holdings Pty Ltd.



Anthony Altomonte

Managing Director

Date: 17<sup>th</sup> March 2021

