

Issue: 1

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Contact: HR

## 1 Introduction

This Modern Slavery Statement sets out the actions taken by CLA Trading Pty Limited ACN 082 220 399 t/a Europcar (**Europcar**) to assess and address modern slavery risks in its Australian operations and supply chain for the financial year ending 30 June 2020. This Modern Slavery Statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth).

Europcar recognises the risk of modern slavery globally and its continuing prevalence in some industries and global markets. Europcar is firmly committed to ensuring that no element of modern slavery exists in Europcar's operations or supply chains.

## 2 Operations

Europcar is a major player in mobility markets and is part of the Europcar Mobility Group which is listed on Euronext Paris. It is wholly owned by CLA Holdings Ltd ACN 084 548 283, with G1 Holdings (Australia) Pty Ltd ACN 111 575 574 as the parent company. As at March 2021, Europcar has around 430 corporate employees of which 340 are based in Operations in Europcar's rental stations and approximately 90 are based in Europcar's headquarters located in Tullamarine, Victoria.

Europcar operates in all Australian States and Territories, with around 105 locations Australia wide. This includes 22 franchise locations.

## 3 Supply Chain

Europcar's supply chain includes both overseas and Australian based suppliers, with a total supply chain of approximately 830 suppliers. Europcar's supply chain entails:

- Manufacturers, distributors and repairers of automobile and other vehicle supplies;
- Personnel engaged through Europcar's wash partners and reservations call centre / back office as part of Europcar's operational processes;
- Professional services including legal, tax and other accounting services;
- Insurance;
- IT and office equipment and consumables;
- Software; and
- Telephone and internet.

Europcar's motor vehicles are purchased from Australian suppliers, however America, Germany, Japan, China, South Korea, Italy and France are identified as the original source.

## 4 Risks of modern slavery practices in the operations and supply chains

Europcar recognises that as a volume purchaser of goods, particularly motor vehicles, the business conduct and performance of its suppliers can have a significant impact on its performance and reputation within the communities in which it operates.

To that end, Europcar aims to conduct business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights.

As it currently stands, Europcar's supply chain is predominantly limited to Australia, however it has a reservations call centre and some back office support roles that are based in the Philippines. Europcar considers this outsourcing arrangement to be low risk.

During the current reporting period, Europcar did not identify any instances of modern slavery practices within Europcar's operations.

## 5 **Actions taken to address modern slavery risks**

As part of Europcar's initiative to identify, mitigate and respond to modern slavery risks, Europcar:

- Abides by a Code of Ethics and Commitment, under which Europcar's guiding principles include:
  - complying with national and international laws and regulations;
  - respecting the dignity and the human & property rights of Europcar's employees, customers, industrial and commercial partners, and shareholders, whether they are defined by local or international legislation, regulations or standards;
- Observes various conventions of the International Labor Organization including Conventions 29, 105, 138 and 182 which concern child labour and forced labour;
- Undertakes responsible procurement by engaging only with suppliers who operate in a manner consistent with Europcar's Supplier Compliance Statement, which requires suppliers who engage personnel to work on Europcar sites to declare to Europcar, every quarter, that:
  - they have taken all reasonable steps to ensure that they have complied with their obligations under the relevant work health and safety legislation;
  - all personnel engaged by them have the right to work in Australia; and
  - they have complied with all of their statutory and industrial obligations under legislation and all applicable industrial instruments, including any applicable modern awards or enterprise agreements and the National Employment Standards;
- Promotes transparency by encouraging whistle-blowers to report instances of unethical, unlawful or undesirable conduct in accordance with Europcar's Ethics Principles and Whistleblowing Tools; and
- Undertakes training programs in compliance specifically in relation to its Code of Ethics and Commitment including Whistleblowing, Anti-bribery and International Sanctions. Europcar requires 100% completion of these three courses by new employees on commencement and by existing employees on an annual or bi-annual basis.

Europcar's responsible procurement is further reinforced in its Code of Ethics and Commitment which outlines Europcar's objective to choose industrial and commercial partners who are able to provide guarantees that they comply with:

- the ban on child labour and forced labour;
- the ban on practices detrimental to human dignity;
- implementation of legal mechanisms that guarantee employee representation and the defence of labour rights within the company;
- compliance with regulations applicable, in particular, to working conditions and working hours;

- implementation of mechanisms designed to promote open labour relations, where they exist; and
- compliance with applicable regulations regarding health and the environment.

In addition to the above, Europcar adopts a Corporate Social Responsibility Supplier Policy which requires suppliers to declare that they respect the basic human rights of employees, including:

- refusing to employ or make anyone work against their will;
- refusing to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
- complying with the maximum number of working hours laid down in the applicable laws; and
- employing no child, and observing the International Labor Organization Convention 138.

## **6 Actions taken to assess modern slavery risks**

Europcar acknowledges that the modern slavery risks relating to third parties vary depending on their industry, geographic location and company size. Therefore, the scope of Europcar's policies, processes and systems reflect these specific risks.

Europcar's policy is that third parties with whom it deals are assessed to ensure that they meet a sufficient level of integrity. Those assessments can assist Europcar in identifying potential instances of modern slavery, and include consideration of:

- the nature of the third party (private or public entity);
- the type and strength of relationship with Europcar;
- the amount of the contract with Europcar;
- the country where the third party is located; and
- the activity and/or sector of activity of the third party.

Europcar's policy is to conduct periodic audits to determine whether third parties continue to meet a sufficient level of integrity.

## **7 Tracking and ensuring the effectiveness of actions**

Europcar requires its supply chain wash partners to complete self-audits periodically in relation to their compliance with Australian employment laws.

Further, Europcar periodically audits its suppliers to confirm their ongoing adherence to Europcar's Corporate Social Responsibility Supplier Policy (as noted above under Point 5, this policy requires – among other things – respect for human rights and compliance with legislated maximum working hours).

## 8 Consultation process

Europcar, in partnership with its stakeholders, will continue to review and develop its Modern Slavery Statement as its risks and business models change. This Modern Slavery Statement will be reviewed each year in consultation with all relevant stakeholders, and updated as appropriate.

This statement was approved by the board of CLA Trading Pty Ltd on 25 of March 2021.

A handwritten signature in black ink, consisting of a large, stylized 'B' followed by a horizontal line extending to the right.

Benoit Garel

Managing Director