



ALTOMONTE HOLDINGS PTY LTD

MODERN SLAVERY STATEMENT 2024

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 Modern Slavery Statement we report on the steps we have taken to comply with our obligations under the Modern Slavery Act for the period from 1 July 2023 to 30 June 2024.

Alto Group is committed to complying with its legal obligations and to behaving in an ethical and fair manner in our dealings with our customers, staff and those we do business with. This includes a commitment that the Alto Group will not knowingly support or deal with any business involved in modern slavery

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, currently consisting of:

- 6 subsidiaries that between them hold 17 motor vehicle franchises,
- 2 subsidiaries that operate in the finance area,
- 8 subsidiaries that own properties in retail, commercial, industrial, residential and rural areas,
- 2 subsidiaries that conduct farming operations, and
- 1 building and property maintenance 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 employed 563 staff across its operations as at 30 June 2024.

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 Scone, NSW, mixed farming and grazing of cattle and sheep, and broadacre cropping of wheat, sorghum, cotton, and other crops at Dunedoo and on the Liverpool Plain region of NSW.

- **Building Operations:**
providing building and property maintenance services to companies within the Alto Group.

There have been no major changes to the Group's business operations since our last Modern Slavery Statement was filed.

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, Cupra and Skoda), Toyota, Mitsubishi, Jaguar/Land Rover, Isuzu Ute, MG and Chery. These manufacturers are based in Germany, Japan, China 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.

In addition to compliance with the law, Alto Group is committed to conducting its operations in an ethical and fair manner. It has developed a Supplier Code of Conduct which sets out the Group's expectations of our suppliers, including that all supplies are made without the use of modern slavery within their supply chains. We note that, over the past year we have seen an increase in the number of our local suppliers who have also introduced similar supply chain policies.

Alto Group's principal suppliers, the OEM's are, with the exception of Cupra, franchisors to the Alto Group. The Cupra dealership is operated by Alto as agent for the importer. 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

Alto Group has developed a Supplier Code of Conduct, setting out the minimum workplace standards and business practices that Alto expects from its suppliers. These standards were established to ensure that all suppliers are aware of Alto's expectation that they conduct their businesses with integrity and respect and in full compliance with the law. During the reporting period Alto has been developing more effective supplier response systems which should see the number and quality of supplier responses to their modern slavery risks improve over the coming reporting period. We will analyse these responses to better assess the effectiveness of our actions in this area.

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 maintained 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 receives a report from the Group Corporate Counsel as needed, but at least annually, to update the Board on the Alto Group's ongoing response to its modern slavery obligations. The Board has commenced and will continue to develop reporting frameworks to enable it to review the effectiveness of actions Alto Group is taking to assess and address modern slavery risks in our operations and supply chains. This includes reviewing downstream suppliers of labour to the Group where the focus is on ensuring taxes and charges (including Payroll Tax, SGC, and withholding tax) are identified and remitted as a means of ensuring proper remuneration is paid to labour suppliers.

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 are the Group's Dealer Principal, CFO and Corporate Counsel. Alto Group also conducts a group wide accounts payable system. This enables all Group entities to be involved in the Group's response and for any particular risk applicable to a Group entity to be identified and appropriately assessed.

As all Group entities have a common senior management structure, all entities are included in the Group's consideration of and response to its Modern Slavery obligations, thus ensuring all entities owned or controlled by Altomonte Holdings Pty Ltd are consulted in the development of this Statement. Details of the Group's reporting requirements and actions we have taken to comply with these requirements are discussed with them.

This Statement has been endorsed by the Board of Directors of Altomonte Holdings Pty Ltd at its meeting on 16 October 2024.

Date: 5th December 2024

A handwritten signature in black ink, appearing to read 'A. Altomonte', with a long horizontal flourish extending to the right.

Anthony Altomonte

Managing Director