



MODERN SLAVERY STATEMENT

Reporting Period: 1 July 2022 and 30 June 2023

Introduction

In this Statement, unless expressly mentioned otherwise, references to the “**NGP Group**”, refers to NGP Investments (No.1) Pty Ltd and the reporting entities set out in Schedule 1 of this Statement, as defined in the *Modern Slavery Act 2018* (Cth) (the **Act**).

This statement is submitted by the NGP Group on its own behalf, and on behalf of each reporting entity in the NGP Group and sets out the actions taken by the NGP Group during the reporting period (**Statement**).

All entities within the NGP Group are incorporated in Australia.

NGP Group opposes slavery in all forms. NGP Group recognises the importance of protecting human rights and is strongly committed to seeking to ensure that their employees, customers, those who may be impacted by their activities and those within their supply chain operations are free from all forms of modern slavery.

Business Structure, Operations and Supply Chain

Business Structure and Operations

NGP Group is a corporate group comprised of several privately owned Australian companies. The NGP Group’s core operations during the reporting period consisted of automotive retail dealerships in Victoria, New South Wales, the Australian Capital Territory and Queensland providing full-service facilities including the sale of new and used vehicles, service, parts, and the facilitation of consumer finance. The NGP Group employed an average of 1,998 people during the reporting period.

Supply Chain

NGP Group’s supply chain centres around the manufacture of motor vehicles and parts, and the transportation of the products it sells at NGP Group dealerships and workshop sites. NGP Group’s supply chain includes:

- The procurement of motor vehicles and parts from overseas facilities where motor vehicles and parts are manufactured and assembled;
- The procurement of transportation services from local contractors;
- The procurement of other services from local contractors (for example, security, vehicle detailing and cleaning).

The largest suppliers by dollar value, including overseas equipment manufacturers (OEMs), have stable, long term supply arrangements with the NGP Group.

Risks of Modern Slavery Practices in Operations and Supply Chain

Modern slavery practices in the operations and supply chains of companies pose significant risks, both ethically and legally to the NGP Group which include:

- *Reputational and Financial Risk:* Any involvement in modern slavery practices risks severe damage to the NGP Group and its associated entities' brand reputation and its' revenue streams.
- *Legal and Regulatory Risks:* Australia has stringent laws to combat modern slavery, and engaging in such practices can result in severe legal consequences including significant fines and civil litigation.
- *Operational Risks:* Discovery of modern slavery practices within a supply chain can lead to disruptions as the NGP Group may need to reevaluate and possibly restructure their supply chains to eliminate unethical practices diverting attention and funds from other business priorities.
- *Supply Chain Complexity:* NGP Group's operations are based wholly within Australia, a low-risk geographical region, although we acknowledge that there may be some inherent risks in our global supply chains. These supply chains can be complex and opaque and the NGP Group may struggle to identify and address modern slavery risks in these supply chains effectively.

During this reporting period, we continued to consider our supply chains and operations to identify modern slavery related risks. During the assessment process, we identified the highest risk areas as being:

- *Manufacturing:* The manufacturing sector is particularly vulnerable to modern slavery. The modern slavery statements of our manufacturing partners include more information on their respective approaches to modern slavery risks.
- *Migration Services:* Offshore labour organised by third party recruiters in the Middle East and the Philippines presents an increased risk of exploitative recruitment and employment practices;
- *Services Procurement:* This sector has an increased use of migrant and unskilled workers and an increased risk of exploitative recruitment and employment practices. The suppliers identified as the major risks include; security, detailing, cleaning and maintenance services and the procurement of branded goods not for re-sale.

Actions taken to address modern slavery risks, including due diligence and remediation processes.

NGP Group is taking the following action to assess and address risks of modern slavery practices in its operations and supply chains:

1. NGP Group takes active steps towards ensuring that the organisations it enters into business with have ethical workplace practices and acknowledges that this requires continued commitment and diligence. We continue to monitor the approaches to Modern Slavery of our biggest suppliers, our manufacturing partners, all of which have provided comprehensive Modern Slavery Statements. A supplier survey is also providing important information from our significant suppliers to assist us understanding where further investigation is required.
2. The NGP Group continues to focus on its' preferred supplier arrangements with a Registered Migration Agent and a Recruiter specialising in sourcing automotive technicians from the Middle East and Asia to ensure that the new recruits are protected from any exploitative practices.
3. A standing internal working group comprising of key stakeholders who are overseeing the development of the NGP Group's approach to Modern Slavery continue to focus on increasing awareness of modern slavery, identifying modern slavery risks and how to respond to those risks. The internal working group continues to review our response to modern slavery, reviewing any relevant issues reported through communication channels including any reported issues with suppliers and oversees our Modern Slavery Statement, Modern Slavery Policy, Supplier Survey, Whistleblower Protection Policy and Code of Conduct.
4. Ongoing education and training of internal stakeholders via various internal and external communication channels continues including a new online training module to be launched in 2024.
5. There are several mechanisms for employees and third parties to report (including anonymously) suspected or actual illegal activity or breaches of Company Policy, including in relation to modern slavery issues. Employees can utilise the internal complaints procedure, including the Whistleblower Protection Policy.
6. The current policies in place across the NGP Group, which assist in reducing and mitigating any risks of modern slavery include the Modern Slavery Policy, the Whistleblower Protection Policy and the Code of Conduct.

Effectiveness of actions and next steps

NGP Group considers it is important to review, update and develop its processes to minimise the risk of modern slavery occurring in connection with its business and operations. This will be achieved through reviewing any information collected from suppliers and continuing to implement a Modern Slavery Plan. The annual senior management review will continue to review our response to modern slavery. An online training module will be launched in 2024 to help designated employees understand what

modern slavery is, the types of conduct that is modern slavery, where the risks might lie in your operations and supply chain, and what you can do to mitigate those risks.

Process of Consultation with NGP Group

Monthly management meetings with reporting entities provide an opportunity to report on and review relevant issues or concerns with any suppliers.

NGP Group is committed to continuous improvement with respect to its supply chain and recognises that our company has a global supply chain that exposes it to risks that it may be linked to modern slavery practices through its suppliers.

This statement was approved by the boards of each of the reporting entities set out in the Schedule.



Daniel Ryan
Chief Executive Officer
NGP Group

NGP Group

Schedule of Reporting Entities

Company Name	ABN
N G P Investments (No 1) Pty Ltd	80 001 495 352
N G P Investments (No 2) Pty Ltd	78 001 495 343
Castlereagh Automotive Pty Ltd	84 136 581 970
Coniston Trucks Pty Ltd	15 638 816 912
Inchurch Automotive Pty Ltd	74 137 048 474
Janrule Pty Limited	45 003 484 571
N G P Essendon Pty Ltd	73 616 1 18 051
N G P Ingles Pty Ltd	53 631 340 728
N G P Lorimer Pty Ltd	98 610 702 988
N G P Melbourne Investments Pty Ltd	48 078 856 381
N G P Melbourne Pty Ltd	79 004 074 819
N G P Toorak Pty Ltd	71 608 590 361
N G P Wollongong Pty Ltd	33 632 002 781
NDM Investments Group Pty Ltd	74 607 497 754
NGP Finance Pty Ltd	79 629 752 969
NST Investment Pty Ltd	26 112 693 562
Penrith City Automotive Pty Ltd	31 091 198 631
Penrith City Holdings Pty Ltd	28 091 514 000
Prestige Cars Pty Ltd	59 068 818 020
South East Automotive Pty Limited	16 1 17 048 450
Southern Highlands Automotive Pty Ltd	12 095 216 961
Southern Highlands Motors Pty Ltd	91 131 107 983
Southsub Pty Ltd	20 637 081 077
The Trustee for MCT Property Trust	26 578 653 682
Western Region Automotive Pty Limited	72 112 718 420
WFM Motors Pty Limited	31 001 632 837
Winbirra Estate Pty Ltd	65 074 110 991