



# MODERN SLAVERY STATEMENT 2023-24

## HEAD OFFICE

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## Contents

We have addressed the mandatory criteria detailed in the *Modern Slavery Act 2018* as follows:

Section	Requirement	Reference in our Statement
16(1)(a)	Identification of the reporting entity	Our Statement <b>page 5</b>
16(1)(b)	Description of our structure, operations, and supply chain	Our Structure, Operations and Supply Chains <b>page 7</b>
16(1)(c)	Description of the risks of modern slavery practices in our operations and supply chains and any entities we own or control	Risks of Modern Slavery Practices <b>page 10</b>
16(1)(d)	Description of the actions we have taken to assess and address these risks (including due diligence and remediation processes)	Actions taken to Assess & Address Modern Slavery Risks <b>page 13</b>
16(1)(e)	How we assess the effectiveness of our actions	Assessment of the Actions Taken to Address Risks <b>page 19</b>
16(1)(f)	Description of the process of consultation with any entities the reporting entity owns or controls	Our Statement <b>page 5</b>
16(1)(g)	Provide any other relevant information	Moving Forward - Our Modern Slavery Goals <b>page 21</b>





## 1. A message from Our CEO

Modern slavery remains a global focus, affecting many countries around the world. Royans continue to recognise our responsibility to identify, respond and contribute to the fight against modern slavery. Modern slavery has no place either within our business or our supply chain. By understanding our connection to human rights impacts and collaborating with our business partners, we aim to mitigate adverse effects.

Our mission at Royans is to remove every possible obstacle to getting our customers back on the road and back to business. This principle guides our decisions, initiatives, processes, and partnerships.

As we rely on diverse suppliers for goods, services, and equipment, we take a due diligence approach. Ethical sourcing is a priority, and we strive to engage with safe, inclusive, and respectful workplaces.

Our statement sets out the steps we've taken over FY24 and strategies we aim to employ, to manage the risks of modern slavery. It also outlines our review of internal operations and supply chains, which focuses on increasing and implementing robust processes to minimise and combat issues in this area.

We recognise that the greatest risk lies indirectly within our supply chain. While there is no single solution to human rights issues, we remain committed to building on our progress and continuously improving our approach to identifying, monitoring, managing, and reporting on modern slavery. Our commitment extends to training our team and enhancing transparency with direct suppliers. We strive for ongoing improvement.



**David Church**

Chief Executive Officer



## 2. Our Statement

This modern slavery statement, published in accordance with the *Modern Slavery Act 2018* (Cth), sets out the steps taken by Royans Group to identify and address its modern slavery risk over the period 1 July 2023 - 30 June 2024 (FY24).

This joint statement has been prepared on behalf of the following reporting entities:

- Royan Group Holdco Pty Ltd
- Royan Group Midco Pty Ltd
- Royan Group Bidco Pty Ltd

This statement also includes information in relation to the other wholly owned members of the Royans Group, including:

- Royans Melbourne Pty Ltd
- Royan Truck & Trailer Repairs Pty Ltd
- Royans Brisbane Pty Ltd
- Royans Newcastle Pty Ltd
- Royans Wagga Pty Ltd
- Royans Dubbo Pty Ltd
- Royans Wodonga Pty Ltd
- Royans Dandenong Pty Ltd
- Trucking Supplies Bidco Pty Ltd
- Bill O'Brien Smash Repairs Pty Ltd
- TFI Group Pty Ltd
- Royan Group New Zealand Operations Ltd

Royan Group Holdco Pty Ltd, Royan Group Midco Pty Ltd and Royan Group Bidco Pty Ltd, and the entities they own or control, are managed centrally, with shared governance, policies and procedures pertaining to human rights risks. Due to this centralised management structure, a segregated consultation process pertaining to the entities owned or controlled by the reporting entities, and the reporting entities was not required. Each of the reporting entities were engaged with the entities they own or control on an ongoing basis, as part of this amalgamated approach, which greatly facilitated the preparation of this joint statement. References to 'our' and 'we' in this Statement are references to the Royans Group.

This statement describes our progress during the reporting period, outlines our position, approach and key learnings in relation to modern slavery risk management and seeks to provide readers with a transparent view of our risks, actions and areas for improvement.

This modern slavery statement was approved by the Board of the Royan Group Holdco Pty Ltd as parent entity.



William Andrews  
Chair



David Church  
Group CEO & Director

29 November 2024





## 4. Our Structure, Operations and Supply Chains

Royans Group has over 628 employees in Australia and New Zealand.

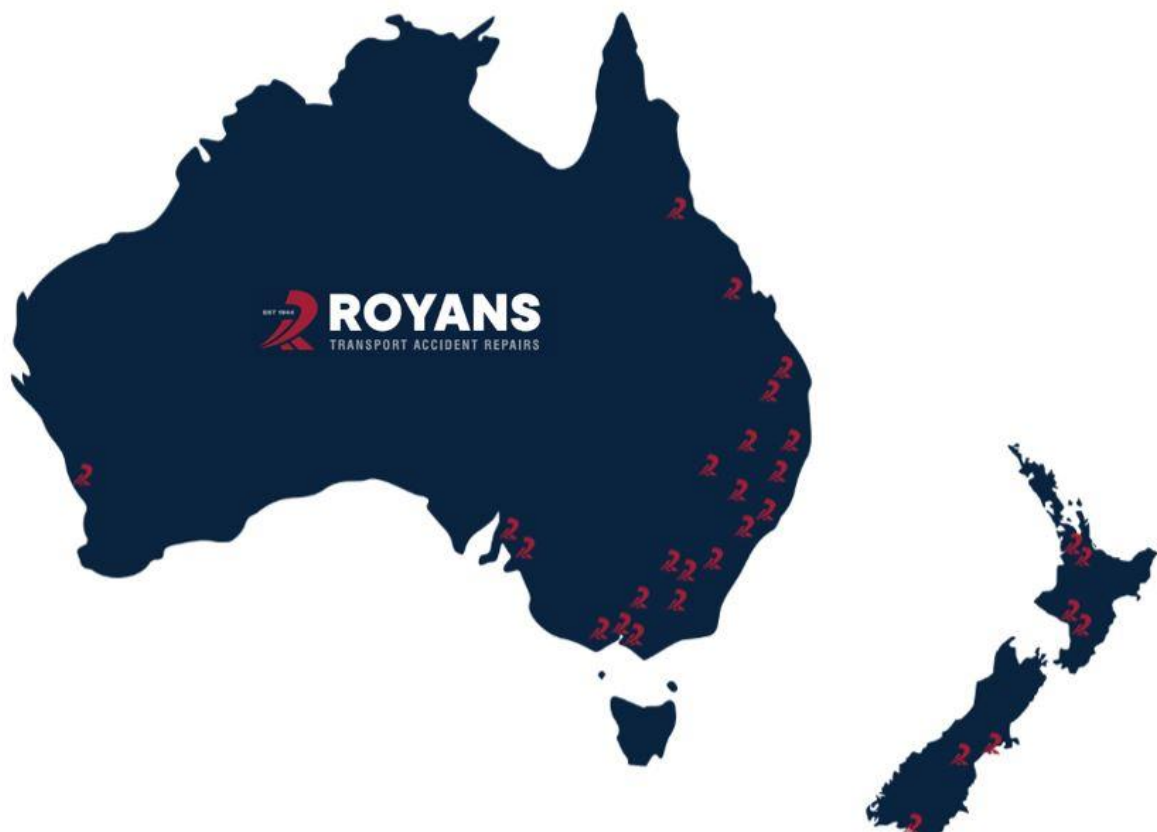
The registered office of Royans Group Holdco Pty Ltd is 14 Royan Place, Bayswater North VIC 3153.

### Our Services

We provide a range of services for all types of commercial vehicles including:

- truck repairs
- trailer repairs
- bus & coach repairs
- earth moving repairs
- defence equipment repairs
- chassis alignment
- fibreglass repairs
- paint & refinishing
- powder coating
- sandblasting
- fleet imaging & signage
- trailer manufacturing & servicing
- truck & 4WD spare parts

Royans are the trusted leaders within the transport industry and currently have the largest branch network in the region, consisting of 27 branches throughout both Australia and New Zealand.



## **Our Suppliers**

During FY24, our focus has been on further reviewing our major suppliers, with a view to identify any evidence of modern slavery practices in these operations or supply chains.

We have completed reviews of these suppliers and have set out the details of this process in section 6 of this statement. In previous years we have focused on building meaningful partnerships with our major suppliers and reinforcing that we have a shared responsibility with them to assess and address modern slavery risks in our operations and supply chains. During FY24 we identified other possible high risk sectors and we focused our efforts towards review of these suppliers, as well as any new providers Royans were looking to potentially engage.

In our business operations, we collaborate with third-party service providers. While working with these partners, we acknowledge the inherent risk that may contribute to modern slavery practices. We expect our suppliers, and potential suppliers, to uphold high ethical standards, operate legally, and maintain professionalism. Adherence to the Royans Supplier Code of Conduct is essential. Furthermore, we encourage our suppliers to promote similar ethical standards throughout their own supply chains.

We will continue to review of our product & services supply chains during FY25.







## 5. Risks of Modern Slavery Practices

### Supply Chain Transparency

During FY24 we continued our desktop review of our supply chain in order to assist us to identify modern slavery risks that may be present in our supply chains. The following indicators were, again, the primary source used to identify and assess potential supplier risk:

- sector and industry risk;
- product and services risk; and
- geographic risk.

Within Royans' supply chains, the following key products and services were identified for further investigation for potential modern slavery risks:

- **Spare parts, consumables and accessories** – supplied by manufacturers with production facilities in regions or countries with high modern slavery risk profiles such as China, Russia, Latin America, Mexico and India;
- **Trade Waste**
- **Manufacturing**

Our major suppliers are generally internationally recognised companies with their own modern slavery reporting requirements and therefore the risk of modern slavery is considered low. However, during FY25 we will continue to take steps to review the products & services sourced from our suppliers to identify any related risks.

### Migrant Workers

In recent years, our industry has been suffering from an extreme reduced supply of skilled labour. Consequently, to supplement our local workforce, Royans have recently opted to trial international recruitment for highly skilled workers.

Identifying that migrant workers, particularly those without the legal right to work in Australia, are potentially at higher risk of modern slavery practices, Royans ensures we practice 'responsible recruitment' in the engagement of migrant workers. Royans conducts additional due diligence when onboarding recruitment suppliers and only forms partnerships with immigration consultants who execute ethical hiring.

Australian immigration laws are also very strict, and Royans ensures we abide by all of these laws. Any migrant workers become Royans full-time employees, rather than labour hire or contract workers, employed on the same terms and conditions as all of our other employees, including ensuring that no migrant worker is on less remuneration than our lowest paid equivalent tradesman. This prevents exploitation of the overseas employees and ensures they are financially treated the same as any Australian citizen.

As outlined in section 6, we also have policies and mechanisms in place to protect the rights of all of our employees, including Employee Code of Conduct, Grievance policy, Whistle Blowing policy, Equal Employment Opportunity policy, Employment agreements, Modern Slavery Policy & Employee Assistance & Wellbeing Program. These are all designed to provide a fair & respectful work environment for our people.





## 6. Actions taken to Assess & Address Modern Slavery Risks

### Supplier Code of Conduct.

The **Royans Supplier Code of Conduct** sets out the minimum standards of ethical and responsible behaviour that Royans expects from its suppliers.

Royans is working with its suppliers and business partners to support them to meet and exceed the minimum requirements outlined in the Code. Royans has also advised suppliers that it will take action if they are not prepared to adhere to this Code (which may involve cancelling or terminating agreements with suppliers and ceasing to do business with suppliers).

The Royans Code of Conduct requires that all suppliers to Royans must:

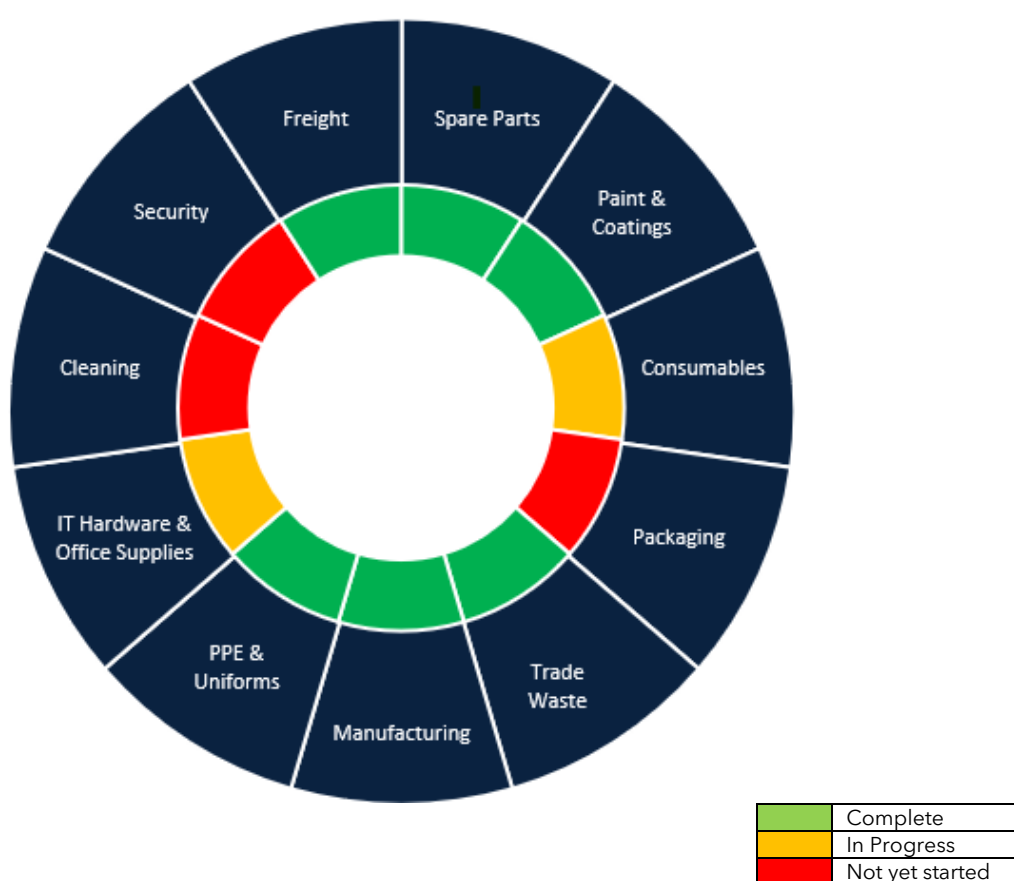
- agree to take steps to identify and eliminate:
  - slavery or forced servitude of any kind;
  - trafficking in persons;
  - forced labour;
  - debt bondage;
  - labour facilitated by any form of coercion or deception;
  - child labour;in all of the supplier's (and any authorised sub-contractor's) operations and supply chains;
- comply with all relevant local laws and regulations – and where a conflict in law or requirements arises, apply the highest standard;
- adopt and adhere to conditions of employment for workers that ensures non-discrimination, respect and safeguards their rights under local labour laws and regulations;
- provide a safe and healthy workplace - which meets or exceeds the requirements of all relevant health and safety laws or requirements and is designed to prevent accidents or injury to workers;
- ensure that all workers are paid a fair living wage and all legally mandated benefits – which should be at least the minimum wage required by applicable local laws or industry standards;
- ensure workers are not required to work in excess of the number of hours permitted by applicable local law;
- provide transparency in relation to any relevant supply chains and operations - including disclosure to Royans of sources of raw materials, manufacturing sources or other information relating to the supply of goods or services - upon request from Royans or its authorised representative;
- provide to Royans (upon request), information regarding sustainability, workforce, country of origin and other information relevant to the provision of services or the manufacture of products that are supplied to Royans;
- ensure third parties acting on their behalf comply with the Royans Code of Conduct;
- not enter into transactions with Royans that would create a conflict of interest;
- not offer excessive gifts or entertainment that would have an adverse effect on Royans reputation;

- comply with all applicable local laws and regulations on corruption, bribery, prohibited business practices, competition and antitrust;
- maintain environmentally responsible and sustainable business practices that comply with all laws and regulations in the countries where the supplier operates; and
- Comply with all applicable privacy laws and secure confidential information including all personal and sensitive data against unauthorised access or misuse. Where personal information is collected or shared for legitimate business purposes or legal reasons it should be treated with care and protected in accordance with relevant privacy laws and regulations

## Supplier Review and Audit Processes

We continue to improve how we are assessing and addressing modern slavery risks in our operations and supply chains. We understand that supply chain mapping is critical to the process of identifying and addressing Royan's risk of being linked to modern slavery practices. During FY24, we focussed on further reviewing our major suppliers with a view to identifying any evidence of modern slavery practices.

We have implemented controls & embedded checks into our routine supplier onboarding & due diligence process, whereby all potential major suppliers are being vetted by desktop review and are then requested to complete a **questionnaire** & return a signed version of our **Supplier Code of Conduct**. In addition, we also conducted the same process on our existing major suppliers based on the criteria of the monetary value Royans spend with them, their country of origin, their 'direct shipping' fulfillment methods & the products or services they supply. Our major categories of procurement are detailed below, along with our review progress:





The questionnaire component of our due diligence process, aimed at higher risk & higher spend suppliers, asks for relevant information about their business practices, their workers and their own supply chains. This supplier review includes questions designed to give Royans a better understanding of the workforce and workplace policies of the businesses that we engage to provide services to support our business.

We have taken steps to tailor our questions and follow up requests to suppliers based on their risk profile - for example, we did not require some lower risk suppliers to undergo the same review process as suppliers that operate in a higher risk sector. Some of the modern slavery risk related questions we asked suppliers were:

1. Are their workers on short term contracts?
2. What percentage of workers are on short term contracts and what percentage are permanent?
3. If any of the workers that they contract are sourced directly from overseas countries (using labour recruiters) or promised jobs with their business before they come to Australia or New Zealand?
4. If they were aware of any low-skilled migrant workers working in their organisation's supply chains?
5. Does the business have a genuine worker grievance mechanism - where workers can make complaints about their working conditions or wages?

We also asked suppliers to confirm (if they could) that:

- that the business has employment systems, policies and procedures in place to comply with relevant labour laws in Australia or New Zealand;
- all workers are paid their legal pay entitlements, on time and provided with pay slips clearly showing how wages have been calculated and details of any deductions;
- whether their organisation is required to publish a Modern Slavery Statement in accordance with the Modern Slavery Act and that they supply us a copy if available;
- if their organisation has policies and processes to identify, investigate and remedy the risk and any instances of Modern Slavery within their organisation
- that the business provides training to their employees on modern slavery risk factors;
- they will supply us with any current independent audit reports or certification documents that are available to them to demonstrate their compliance with the relevant requirements set out in SA8000, WRAP, BSCI, SEDEX, SMETA, FRDM, FSLM etc;
- if they conduct any due diligence or screen prospective suppliers for Modern Slavery risks on suppliers; and
- what action their organisation takes if Modern Slavery practices are suspected or discovered.

We have reviewed the supplier responses received from our questionnaires completed and are comfortable no risk has been found among these results. Many of our major suppliers are larger companies that are also required to prepare and submit an annual modern slavery statement. Some of these larger businesses have provided us with their modern slavery related documentation and policies, and we have retained these for our records.

We remain committed to continually improving our practices to ensure that there is no modern slavery or human trafficking in our supply chain.

## **Modern Slavery Training**

During FY24 we rolled out online modern slavery training modules for our Parts Procurement and Finance staff, along with any new staff that are part of the Branch Management and/or Corporate Services teams.

The training modules covered topics including:

- Understanding modern slavery
- Compliance with modern slavery
- The role procurement employees play in combating modern slavery
- Indicators of modern slavery risks and some practical tips on how to assess for these risks
- The importance of knowing our suppliers and taking a risk-based approach
- Tools that can be used to help mitigate modern slavery risks throughout the procurement cycle
- How to report any concerns

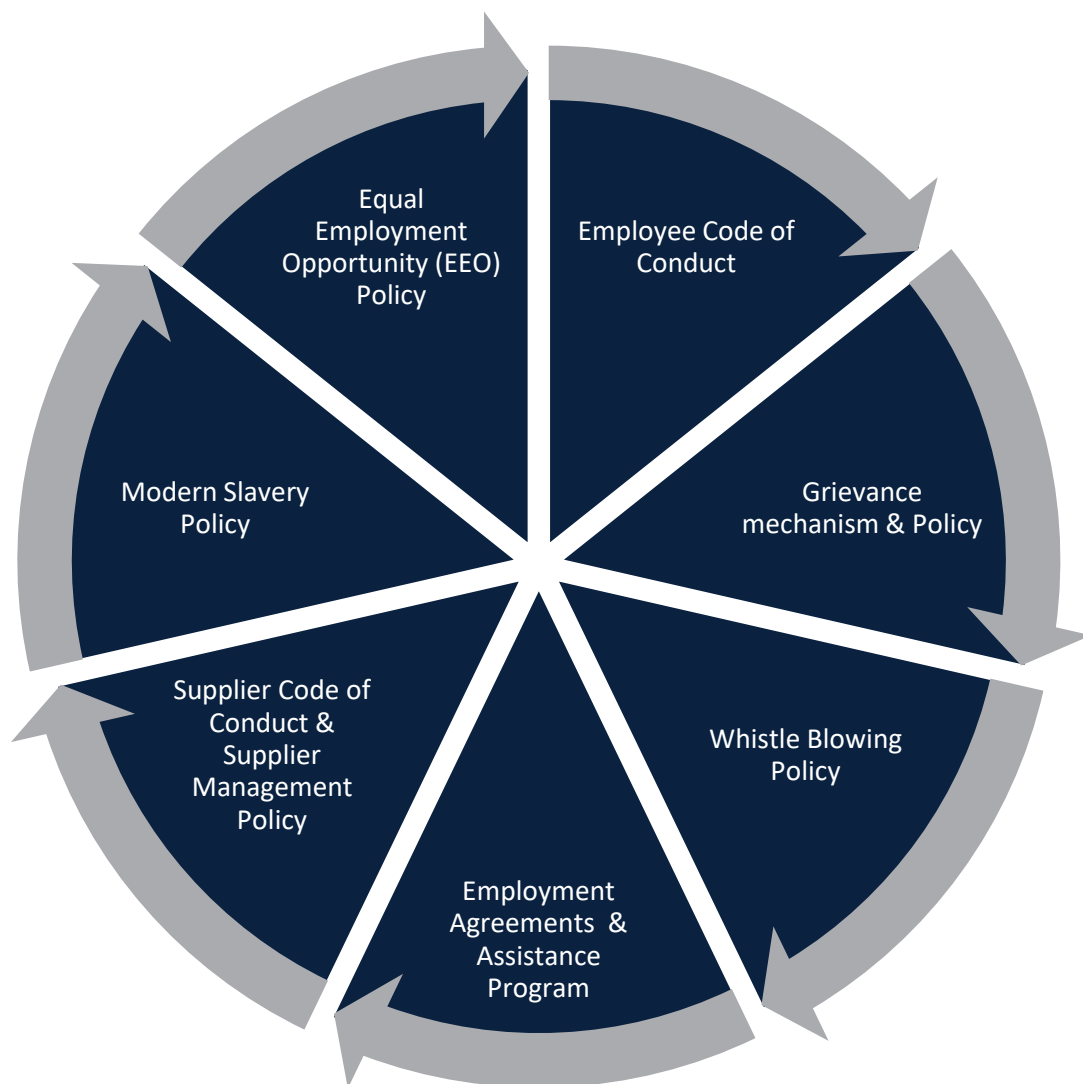
The training also provided our teams with information about the business' reporting obligations under the *Modern Slavery Act 2018* and modern slavery legislation and initiatives around the world.

We will continue to implement this modern slavery training out to our broader team and new starters on a regular basis.

## Internal Policies and Processes

Our internal policies have been developed & updated to assist in managing & mitigating our modern slavery risk. These policies & processes reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and is omitted from our supply chain. This includes ensuring our modern slavery measurement & evaluation framework is designed to promote continuous improvement as well as transparency.

Examples of our policies and procedures which strengthen our control environment pertaining to modern slavery risks are provided below.







## **7. Assessment of the Actions Taken to Address Risks**

At the end of FY24 we reviewed our **Modern Slavery KPIs** to assess our efforts in addressing our modern slavery risks.

### **1. Provide modern slavery training to all Parts Procurement and Finance staff across Australia & New Zealand.**

This training module was completed by 100% of Parts procurement & Finance staff.

### **2. Provide a copy of the Supplier Code of Conduct to major suppliers.**

This Code has been delivered to our major suppliers, with returned, signed copies filed.

### **3. Continue our desktop review of Royans suppliers and segment to identify potential risks of modern slavery.**

This review was conducted and the details of this process are set out in sections 5 & 6.

### **4. Identify opportunities to collaborate with groups from existing networks that are focused on the management and eradication of modern slavery.**

As part of our ongoing procurement project, we have continued to collaborate with our suppliers that are also focused on the management and eradication of modern slavery.

### **5. Prepare our FY24 Modern Slavery Statement for Board approval.**







## 8. Moving Forward – Our Modern Slavery Goals

Royans is committed to taking practical steps where possible to address risks of modern slavery that may be identified in our supply chain. We have developed a set of future actions and KPIs for continued improvement, to focus our work in FY25, which will include:

### Modern Slavery Training

We will further launch our current training to additional members of the Royans team and any new starters. Training will be deployed to our Sales & Customer facing staff in FY25.

### Product Supplier Review

We will remain focused on supplier reviews, in order to assist us to further identify the modern slavery risks that may be present in our supply chains. We will work to identify and assess potential supplier risks based on sector and industry risk, product and services risk and geographic risk.

### FY25 KPI's

Focus area	Key Performance Indicator
<b>Training</b>	Percentage of sales & customer facing team members that undertake modern slavery training in FY25.
<b>Supplier engagement</b>	The number of supplier assessment questionnaires issued.
	The number of supplier assessment questionnaires completed.
	The percentage of supplier assessment questionnaires with governance concerns flagged/incomplete information.
	The number of modern slavery issues identified.
<b>Grievances</b>	The number of whistleblower complaints related to modern slavery risks received each year.
<b>Remediation</b>	The number of remediation actions taken with suppliers.



# ROYANS

TRANSPORT ACCIDENT REPAIRS