

Modern Slavery Statement

2022/2023



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Reporting Entity

Scifleet Group of Companies Pty Ltd ACN 010 079 044, Tsunami Corporation Pty Ltd ACN 052 251 028 (as trustee for the Tsunami Trust) and each of their controlled entities (**we, us, Sci-Fleet Group**) are committed to conducting business with honesty and integrity.

This is our fourth published Modern Slavery Statement in accordance with the obligations of the Modern Slavery Act 2018 (Cth) and pertains to the financial year ending 30 June 2023. The statement sets out the steps taken, and continue to take, by Sci-Fleet Group to prevent modern slavery in our own operations and supply chains. We recognise that modern slavery is a growing global issue, and we understand our part and responsibility to prevent, mitigate and remediate where necessary, the risks associated. We continue to ensure that all employees and suppliers adhere to Sci-Fleet Group policies and procedures.



Our Structure

The Sci-Fleet Group is one of Australia's largest and most successful motor dealership groups. Founded in 1978, the Sci-Fleet Group has grown from two Brisbane dealerships to a large network of dealership and service locations spanning the east coast of Australia, Western Australia and more recently South Australia.

Companies covered in this statement:

Aceway Nominees Pty Ltd (13 077 576 802) WA	Northpoint Fleurieu Pty Ltd (27 627 265 598) SA
Auto Corner Pty Ltd (45 009 905 079) QLD	Northpoint Murraylands Pty Ltd (61 650 004 336) SA
Ducala Pty Ltd (38 008 031 874) SA	Scifleet Group of Companies Pty Ltd (23 010 079 044) QLD
El Nino Pty Ltd (66 056 777 087) QLD	Sci-Fleet Motors Pty Ltd (25 057 783 749) QLD
El Viejo Pty Ltd (72 082 087 983) QLD	South City Automotive Group Pty Ltd (72 098 801 033) QLD
Kaizen Motors Pty Ltd (67 603 805 278) NSW	South Coast Corporation Pty Ltd (41 098 795 763) QLD
La Nina International Pty Ltd (97 082 088 015) QLD	Taipan Corporation Pty Ltd (97 010 410 698) QLD
Maz Fleet Pty Ltd (71 644 881 676) NSW	The Trustee for the Tsunami Trust (15 149 393 182) QLD
Northern Trading Pty Ltd (89 009 956 307) QLD	

Our Operations

The Sci-Fleet Group workforce comprises over 1,700 direct employees operating from locations across Australia, including our Head Office in Brisbane. 56% of our workforce are based in Queensland, 17% in New South Wales, 17% in South Australia and 10% in Western Australia.

We represent 9 Original Equipment Manufacturers (OEM) brands across the Volume, Prestige, and Luxury Segments-



The Sci-Fleet Group operations include 28 sales locations, 15 service locations, 5 pre-delivery centres and 2 paint shops.

- o Parts
 - o Sales of parts and accessories for new and used vehicles
 - Provision of parts to Sci-Fleet Group service workshops
 - o Provision of parts to third party collision repair and servicing outlets
- \circ Service
 - Ongoing vehicle maintenance
 - o OEM warranty repairs
 - Internal reconditioning of used vehicles for sale
 - Preparation of new vehicles for delivery
- o Sales
 - The sale of new & used vehicles



- Aftermarket sales of non-OEM products
- Finance & Insurance
 - o Sales of third-party finance and insurance products (as agents)

As part of this statement, the Sci-Fleet Group reports on its actions to assess and address modern slavery risks associated with its operations, including its employment practices, and providing training for employees.

Our Supply Chains

The Supply Chains of the Sci-Fleet Group are the products and services (including labour) that contribute to each entity's own products and services. This includes products and services sourced in Australia or overseas. We take care in selecting suppliers of goods and services and expect them to operate in compliance with recognised local, national and/or international laws, regulations, standards, and appropriate codes of practice. We are committed to the continuing development of our strong partnerships with suppliers based on mutual trust, understanding and respect, and shared ethical values.

Most of our suppliers are stable, long-term domestic relationships. Less than 1% of our total supplies are sourced directly from an international supplier.

Sci-Fleet Groups' supply chains include suppliers of:

- Motor vehicles, parts, and accessories.
- Equipment and consumables, such as those relevant to our tyre distribution and motor servicing businesses.
- Logistics and transport services.
- Finance and insurance products.
- Professional services.
- Property, cleaning, storage, and waste disposal services.
- Car washing and detailing services.
- o Information technology and telecommunication equipment and services.
- $\circ \quad \text{Office services and supplies.}$
- Food and beverage services.
- Personnel and recruitment services.

Risks of Modern Slavery in our Operations and Supply Chains

The manifestations of modern slavery are complex and hidden, so our risk assessment includes the following to enable us to prioritise activity;

- mapping of supply chains and operations;
- desk-based research;
- o supplier surveys and engagement; and
- o discussions with expert stakeholders.

The Sci-Fleet Group are committed to working with its suppliers to eradicate any modern slavery from its supply chain. We are continuing to undertake measures and incorporate new technology and processes to help identify key suppliers and any risks of modern slavery they bring to our operations. We have reviewed our policies to ensure relevance as part of our continual improvement on minimising risk. These policies include Modern Slavery Policy, Whistleblower Policy, Code of Conduct, COVID-19 Policy, and Supplier Code of Conduct.



The Sci-Fleet Group staff are employed and engaged in Australia under applicable Australian employment, workplace, occupational health and safety and other legislation. We are guided by the two industrial instruments relevant to our industry; Clerks - Private Sector Award 2020 and Vehicle Repair, Services and Retail Award 2020 along with the National Employment Standards (NES). All staff undergo training including Code of Conduct, Respect@Work, Workplace Health and Safety, and Modern Slavery. We conduct monthly payroll audits to capture age increases, apprentice or trainee progression and annual award increases. We have a team of dedicated HR and Compliance professionals and sound policies and procedures in place to ensure compliance with relevant employment, workplace relations and workplace health and safety laws. We have had zero disclosure reported cases to us through our Whistleblower Policy during this financial year. Our workforce includes a small number of workers from outside Australia who have arrived in Australia on working visas. We use recruitment and migration agencies in Australia in the engagement of these employees and we comply with all Department of Home Affairs visa requirements and regulations. We continue to use VEVO, the Department of Home Affairs Visa Entitlement Verification Online system, to confirm unrestricted working rights of all new employees before a formal letter of employment is issued. We offer additional financial and community support to assist our overseas workers to assimilate in to the workplace and the communities in which they reside. The Sci-Fleet Group has not identified any specific modern slavery risks in our operations.

The supply chains in the automotive industry are complex with numerous levels of suppliers between Sci-Fleet Group and the source of raw materials that form the basis of our business' supply chains. We acknowledge that the risk of modern slavery may exist deeper in our supply chain in the manufacture of engines, parts, and accessories for motor vehicles but we have little visibility in these areas. Despite this, we are confident that Sci-Fleet Group continues to operate in a relatively low risk business sector as the principal suppliers of goods to Sci-Fleet Group are original equipment manufacturers (OEMs) which have sophisticated anti-slavery policies and procedures in place. We continue to develop strong relationships with our suppliers to ensure modern slavery considerations are embedded into their operations.

In the financial year 2022/2023 we directly engaged with over 3,800 Tier 1 suppliers with a total expenditure of over \$1 billion. The largest category of spend (75%) was the purchase of vehicles through our OEMs. The remaining proportion (25%) consisted of approximately 3,600 suppliers who provided less than \$100,000 of goods and services.

Actions taken by the Sci-Fleet Group to assess and address risks of modern slavery in its operations and supply chains

As part of our ongoing commitment to meet our WHS and employee obligations and requirements, our focus during this financial year was the development and implementation of a National Safety Management Framework (NSMF) and to resource and implement a compliance LMS platform to deliver consistent, flexible, and engaging training content. The NSMF and LMS cover both relevant policies and training for Modern Slavery, Whistleblower, Code of Conduct, COVID-19, and Supplier Code of Conduct within our operations.

Operations

- The National Safety Management Framework is designed to provide a standardised approach for engaging consistent content where utilisation, goal progress, knowledge gains and ROI can be easily tracked. It allows for documentation creation, delivery, version control, and audits to be centrally administered and analysed at head office.
- The Sci-Fleet Group partnered with Safetrac Compliance, a cloud-based platform to support the group's training requirements to reduce liability risks and to operate more effectively and efficiently by reinforcing knowledge and driving behaviour change. Safetrac compliance courses are prepared and updated in line with legislative requirements and are compulsory training for our employees; courses include Respect@Work, Anti-Bullying and Anti-Harassment and Workplace Health & Safety among others. Safetrac also allows us to host and manage our own policies, and upload and deploy our own training content such as Safe Work Instructions, or bespoke training for specific roles within the group (apprentices, technicians, sales) which we are able to test and report on. In addition, we have access



to the Modern Slavery Safetrac Authored Survey. This survey has been legally authored by a specialist in the field which, once we deploy, will allow us to assess our supply chain compliance and assist in identifying risks in operations and supply chains. It is continuously updated alongside legislative changes and guidance and delivers a seamless, easy-to-use, online-hosted platform which allows easy enrolment of staff and suppliers and the ability to track completions and incomplete testing and surveying. The system automatically sends reminders and follow-ups to staff and suppliers.

 Updated our awareness campaign through the placement of modern slavery posters on staff notice boards around our dealerships. These posters are referenced in department meetings and toolbox talks prior to being displayed.

Supply Chain

- We conducted our Annual Group supplier audit; categorised by spend, geographical location, franchise & finance, business sector & relationships to identify areas that may be causing, contributing, or directly linked to modern slavery practices.
- We reviewed the Sci-Fleet Group curated Supplier Questionnaire and process we piloted to 19 Tier 1 Suppliers in the previous financial year and sourced a new Modern Slavery Survey Tool to simplify the supply chain audit process.
- We have kept lines of communication with our OEMs, compliance/ legal contacts open for collaboration to share insights and experience.

COVID-19 Impacts & Response

We recognise that the impacts of COVID-19 may still have increased modern slavery risks in supply chains such as; increased global demand due to supply chain shortages, shorter production windows, increased unemployment, and a fear of loss of income, factory closures, and the inability of vulnerable migrant workers to return to home countries. We have remained committed to supporting our employees, our suppliers, and our communities during this year. Where possible, work from home arrangements have been made available for those staff who have contracted COVID-19, and access to employee leave entitlements have been made available during this time.

Our COVID-19 Group Policy has been reviewed to reflect the current climate. We have continued to provide the use of masks and hand sanitiser for our employees and guests and we have regular cleaning and disinfecting of high-touch areas and all vehicles. Sci-Fleet Group will continue to assess and address additional risks within automotive supply chains caused by the COVID-19 pandemic.

Plans for future Action

The Sci-Fleet Group has determined to focus on the following activities in the financial year ending 30 June 2024 in assessing its operations and supply chains:

- Annual audit of Group Suppliers by the Sci-Fleet Group Modern Slavery Risk Management Team at Head Office.
- Trial our new Modern Slavery Questionnaire
- Review the process and effectiveness of Modern Slavery Supplier Risk Assessment Toolkit among dealerships within the Sci-Fleet Group and identify areas for improved engagement, compliance and management.
- Review process of issuing the Sci-Fleet Group Supplier Code of Conduct to all new suppliers and renewing contracts.
- We will continue to identify and use opportunities for collaboration to verify and help resolve risk issues within our operations and supply chains, and strengthen our network of supply chain intelligence through our OEMS and external stakeholders.



How Sci-Fleet Group assess the effectiveness of actions being taken to assess and address modern slavery risks

Our focus this financial year was the development and implementation of a national safety management framework and to resource and implement a compliance LMS platform to deliver consistent, flexible, and engaging training content.

The National Safety Management Framework is a mechanism for baseline reporting for keys areas of compliance. The group's significant investment in to Safetrac Compliance now gives us the ability to meet our legal obligations within the everchanging world of compliance, ensuring our staff have the necessary information needed to effectively and safely work for us. We now have the tools to raise awareness of our corporate responsibility and how to assess and detect modern slavery risks in our supply chains.

Our Group Modern Slavery Risk Management Team have consulted throughout the year to ensure due diligence in managing, identifying, preventing, and mitigating the risks of modern slavery across the group and to measure the effectiveness of the actions being taken. The Team is responsible for an annual group supplier audit referencing this document for guidance and assessment.

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and supply chains will be an evolving and ongoing process which we are committed to developing.

Process of consultation with entities owned or controlled by Sci-Fleet Group

There is one management team, Sci-Fleet Group Modern Slavery Risk Management Team, who are responsible for coordinating Sci-Fleet Group's response to modern slavery risks in our operations and supply chains and preparing this statement. The team report to the Executive Committee, the principal governing body of the Sci-Fleet Group. During the reporting period this statement covers, the Sci-Fleet Group Modern Slavery Risk Management Team engaged, consulted with the Executive Committee, entity Dealer Principals, Financial Controllers, and the Group Chief Information Officer and General Manager – Property & Purchasing. We continue to encourage opportunities for collaboration with our OEMs to share experiences and knowledge.

Approval of statement

This statement was approved by

Andrew Gordon Scifleet

Sole Director For and on behalf of Scifleet Group of Companies Pty Ltd ACN 010 079 044 and Tsunami Corporation Pty Ltd ACN 052 251 028 (as trustee for the Tsunami Trust).

Date: 8 December 2023