

Modern Slavery Statement – FY20

Gillen Motors Pty Limited recognises that modern slavery can impact our industry and business, and we have a duty to each person locally and globally to review our supply chains. We support the Modern Slavery Act 2018 (Cth) and commitment to identifying instances where offenders use coercion, threat, deception, exploitation of victims and curtail freedoms.

This statement establishes the progress to date on identifying the risks of Modern Slavery in our operations and supply chains. We have –

- Reviewed our key suppliers/creditors in our supply chain to identify high risk suppliers;
- Reviewed our procurement and supplier on-boarding process to identify and mitigate risks of modern slavery.

Our Dealership is governed by our Phil Says Values, which extend to our internal and external stakeholders and in turn includes our suppliers and consideration of the standards of those suppliers.

Content

Our Modern Slavery Statement (Statement) has been prepared by Gillen Motors Pty Limited for the period 1 July 2019- 30 June 2020 to satisfy the requirements of the Modern Slavery Act 2018 (Commonwealth) (Act). The Statement addresses the Act as follows –

Act Ref	Requirement	Update in our Statement
s16 (a)	Identify the Reporting Entity	<ul style="list-style-type: none"> • Our structure and operations • Our governance framework • Our supply chains and risks posed
s16 (b)	Describe the structure, operations, and supply chains of the reporting entity.	<ul style="list-style-type: none"> • Our structure and operations • Our governance framework • Our supply chains and risks posed
s16 (c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity.	<ul style="list-style-type: none"> • Our supply chains and risks posed
s16 (d)	Describe any actions taken by the reporting entity, to assess and address those risks, including due diligence and remediation processes.	<ul style="list-style-type: none"> • Enhanced Procurement Framework and Risk Assessment
s16 (e)	Describe how the reporting entity assesses the effectiveness of the actions	<ul style="list-style-type: none"> • Enhanced Procurement Framework and Risk Assessment
s16(g)	Include any information that the reporting entity considers relevant	<ul style="list-style-type: none"> • Next Steps

Our Structure and Operations

Gillen Motors Pty Limited (ABN 99 002 555 811) is a privately owned company located in Sydney. We are an automotive retail Dealerships for the purpose of retailing new and used vehicles, parts and accessories, finance and insurance sales as well as engaging in automotive servicing and repairs. We employ 180 people in Australia and are based in two key hubs in Sydney at Lidcombe and Croydon.

Our Governance Framework

We have internal policy and procedure contained on our Internal Intranet, or core Human Resources platform Flare around –

- **Quality Standards and Behavioural Policy** (Should we update this to include Supplier/Stakeholders?)
- **Work Health and Safety**
- **Safety Policy**
- **Ethical Sourcing and Modern Slavery Policy**
- **Supplier Questionnaire**

Our Supply Chains and Risks posed

The supply chain review identified all Suppliers, who are defined as those suppliers that supply goods or services directly to the Dealerships for the FY20 trading year. As a franchisee for Overseas Export Manufacturers our Supply Chains are across the globe and locally in Australia. Some of the countries would be identified as high risk countries.

Our major spending categories, which may present heightened risks of modern slavery including, but not limited to:

Goods – such as vehicles, vehicle parts and vehicle accessories, tyres, merchandise.

With leading Consumer brands Toyota, Hyundai, and Kia, as well as a retailer of tyres, oils, additives, and vehicle protection products, much of these products are sourced, manufactured in off-shore markets.

Technology – such as hardware, software, cloud based services and digital infrastructure;

The Dealership uses several businesses for the supply of computer, printers, mobiles, and other hardware, much of these products are manufactured and sourced in off-shore markets. The Dealership also engages with several suppliers for software and cloud-based services and digital infrastructure which may use off-shore and local staffing and services.

Services – such as professional services, consulting, and contractor's fees;

The Dealership engages with local and off-shore professional services, as well as contracts local work-force and employs some migrant workers under strict visa conditions. Dealership business also engages third parties for the completion of additional vehicle servicing, repairs, and maintenance during ordinary business.

Facilities – such as cleaning, maintenance, capital improvements and utilities;

The Dealership facilities and offices, we rely on support services for cleaning, security, maintenance and construction from external suppliers and contractors.

Procurement for Gillen Motors is managed by the Administration and Finance Team, working collaboratively with the Dealership departments, and overseen by Senior Management team. We continue to explore better methods for uniformity in procurement and engagement of services with our Suppliers.

Enhanced Procurement Framework and Risk Assessment

During FY20 we have developed the Ethical Sourcing and Modern Slavery Policy. The Policy sets out the expected standards and behaviours of all Suppliers to Gillen Motors.

During FY21 we will develop a Supply Chain Risk Assessment –

1. Identification of all Suppliers;
2. Categorisation of all Suppliers in accordance with *Global Slavery Index* 2018 including –
 - a. Product and Service risk
 - b. Sector and Industry risk
 - c. Geographic risk.
3. Engage with high risk suppliers in the following manner –
 - a. Contact and consult with all identified high risk suppliers;
 - b. Supply a copy of our Ethical Sourcing and Modern Slavery Policy;
 - c. Require the completion of our Supplier Questionnaire;
 - d. Work with Suppliers to collaboratively address the risks of ethical sourcing and modern slavery, establish remediation practices to mitigate the risks of modern slavery;
 - e. Inclusion of standard clauses in supply contracts which require suppliers to verify the source of their good and services, provide Gillen Motors access and records, co-operate with Gillen Motors and report to Gillen Motors any actual or suspected instances of modern slavery or unethical sourcing.
4. Facilitate training for Senior Management Team, management team, and all those engaged in procurement are participants in modern slavery risk training.

Assessing our Effectiveness

Gillen Motors acknowledges that addressing the challenges of modern slavery is an evolving process, and in FY21 we will assess our effectiveness by:

- Maintain Senior Management oversight on new supplier/procurement engagement to address modern slavery;
- Review all existing supplier arrangements and responses to modern slavery questionnaire.
- Act upon any deficiencies in accordance with Ethical Sourcing and Modern Slavery Policy and if required terminate supplier relationships which fall below minimum standards.

Next Steps

COVID-19 pandemic had a significant impact on the Dealership operations during the calendar year 2020. Gillen Motors understands the challenges and impacts faced by our Dealerships, were felt by more vulnerable workers both locally and off-shore.

Our aim for the next reporting Statement includes:

- **Greater transparency in the on-boarding of new Supplier/Procurement Contracts** to better understand the risks faced around the supply chain of future supplier/procurement arrangements;
- **Continue to engage closely with present suppliers** – for the Dealership, the most significant modern slavery risks are identified within the supply chain of our Suppliers, or employees/workers of our Suppliers. We will continue to work with those suppliers to identify, manage and where possible mitigate those risks.
- **Training of employees** – develop our Senior Management Team, management team, and all those engaged in procurement are participants in modern slavery risk training.

This Modern Slavery Reporting Statement was approved by the Senior Management, the principal governing body of Gillen Motors Pty Limited trading as Phil Gilbert Motor Group and Gillen Securities Pty Limited on 16 March 2021.

The Directors of Gillen Motors Pty Limited approved this statement on behalf of all –

- 1) Gillen Holdings Pty Limited ATF The Gilbert Family Trust;
- 2) JenTash Pty Limited ATF The Phil and Natasha Family Trust;
- 3) Jenny and Simone Pty Limited ATF The Phil and Simone Family Trust;
- 4) Jenwin Pty Limited ATF The Phil and Edwina Family Trust;
- 5) Jarooka Pty Limited
- 6) Doderry Investments Pty Limited
- 7) Doderry Pty Limited
- 8) Gillen Land Co Pty Limited;

The entities listed (1) – (8) do not have any outward facing operations or undertake external procurement. All procurement is undertaken by Gillen Motors Pty Limited and/or Gillen Securities Pty Limited.

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EDWINA GILBERT
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Edwina Gilbert

Director/Executive Chair

6 July 2021