

Modern Slavery Statement for the Financial Year ended 31 March 2024

This statement is made pursuant to the Modern Slavery Act 2018 (Cth). This statement outlines the approach and initiatives by Summit Auto Lease Australia Pty Ltd ABN 87 054 704 737 (**SALA**) to identify and address the risks of modern slavery in its business operations and supply chains during the financial year commencing 1 April 2023 and ending 31 March 2024 (2023-24 Financial Year or Year 5).

Group Structure

SALA was established on December 20th, 1996 and is a subsidiary company of Sumitomo Mitsui Auto Service Company Ltd (**SMAS**) incorporated in Japan.

It trades under the business name Summit Fleet Leasing and Management and its head office is at Unit 7, 38-46 South Street, Rydalmere NSW.

SMAS shareholders are

- Sumitomo Corporation,
- Sumitomo Mitsui Financial Group Inc.,
- Sumitomo Mitsui Finance and Leasing Co Ltd, and

At the core of SMAS lies the Company's Business Philosophy. The Corporate Mission Statement is based on this philosophy and represents SMAS fundamental and ultimate value standard stating an "utmost respect for the individual" and placing a prime importance on integrity and sound management.

As a subsidiary company of SMAS, SALA shares its parent company's core values and abides by them through its governance, policies and procedures.

SALA's Business

SALA operates nationally with physical offices in New South Wales, Queensland, Victoria and Western Australia, without international presence, does not own or control any other entities and has approximately 93 employees.

SALA is a provider of:

- Operating Leases, Finance Leases, Chattel Mortgage and Fleet Management Services for passenger, light commercial and heavy commercial vehicles dealing with small business, corporate and Government clients; and
- Novated leases to individuals for motor vehicles; and
- Insurance products relating to novated leases; and
- Comprehensive car insurance for small business, corporate and Government clients; and
- Vehicle sales for passenger, light commercial and heavy commercial vehicles.

SALA's stance on Modern Slavery and Human Trafficking

SALA supports the principles of the Commonwealth Modern Slavery Act 2018 in the areas of Human Rights, labour standards, environment and anti-corruption measures.

SALA believes that it has an ethical responsibility to promote human rights by showing respect for human rights through its own behaviour, and by sharing this ethos with its customers.

SALA recognises the complexity of Modern Slavery risk, and in particular the variety of ways in which it can manifest in operations and supply chains. SALA is committed to maintaining and improving systems and processes to mitigate the risk that it might be involved, wittingly or unwittingly, in the commission of Modern Slavery and Human trafficking in any part of its operations, customers and supply chain (including contractors and suppliers), products, services and staff activities.

SALA expects its staff, suppliers and business partners to adhere to similar high standards and to take reasonable steps to ensure that other third parties they do business with adhere to similar standards.

Supply Chain

SALA's operations are primarily office based, focussed on the provision of financial services. The main categories of supply chain activities relating to or supporting the Company's business activities are as follows:

- Manufacturers, distributors and repairers of automobile and other vehicle supplies;
- Third party contractors providing equipment;
- Consultancy and personnel as part of the sale and operational process;
- Third party contractors providing services to SALA on request in relation to its business activities;
- Provision of daily rental vehicles;
- In-life movement of vehicles;
- Roadside emergency breakdown services;
- Accident management services;
- Aftermarket product vehicle accessories;
- IT Services and equipment;
- Office related supplies;
- Professional services (financial, legal, advisory); and
- Commercial property owners and managing agents.

Within these supply chains, our supplier base contains a mixture of short term and longer-term business relationships. Our longer-term business relationships are predominantly subject to written contracts, however, we transact with a number of suppliers on an ad hoc basis.

In Australia, SALA works with approximately 2800 suppliers, ranging from small businesses to multi-national companies, whilst some IT support is procured from suppliers located in Belgium, Singapore, USA, and UK. Of the Company's suppliers, 150 account for more than 82% of its total spend.

SALA takes a collaborative approach to our relationship with our supply chain and encourages transparency by encouraging whistleblowers to report instances of unethical, unlawful or undesirable conduct in accordance with the Whistleblower Policy of SALA. Should issues be reported as a result of our due diligence, we will give guidance and support to our suppliers and contractors to help identify and work through an appropriate resolution.

In the case of repeated or serious instances, we will give consideration to the termination of our relationship accordingly.

Risks of modern slavery

We strive to do business with suppliers who demonstrate ethical business practices and values, including in relation to human rights. The risk that modern slavery is present in our supply chain is assessed in a focussed, collaborative manner by relevant internal stakeholders across our Legal, Risk, Procurement and Operations teams. In seeking to identify the modern slavery risks in our operations and supply chain, we considered the potential for our business to cause, contribute to, or be directly linked to modern slavery. In doing so, we looked at;

- The risk that our operation may directly result in modern slavery practices; and
- The risk that our operations and/or actions in our supply chains contribute to modern slavery; and
- The risk that our operations, products or services are connected to modern slavery through the activities of another entity, including business partners.

Having regard to this assessment process, given the fact that our operations are based in Australia, our geographic risk remains low according to the Global Slavery Index. Furthermore, the risk of modern slavery occurring in our direct employment of workers also remains low having regard to our ongoing compliance with the legal framework regulating employment practices in Australia. For these reasons, we are of the view that there are low risks that our operations have caused or contributed to modern slavery risks during the Reporting Period.

However, the location of our business does not completely remove the risk of modern slavery from our supply chains. We are conscious that our direct suppliers in Australia may have operations and downstream suppliers in countries where modern slavery practices are more prevalent, including those suppliers who manufacture goods with raw materials sourced from high-risk countries. For example, it is widely reported that some motor

vehicle and information technology infrastructure manufacturers rely on their suppliers to source high-risk products such as minerals and other raw materials from countries with an increased risk profile for child or forced labour in order to produce components fitted into their products. This means that, by virtue of our supply chain, we are at risk of being directly linked to modern slavery through the business practices of companies in the later tiers of our supply chain.

Existing Measure in Place to Assess and Address Modern Slavery Risks

In our operations

SALA operates our business in accordance with our Code of Conduct as well as conducting its business in accordance with various policies, including the following which address human rights and ethical employment practices;

- Discrimination, Harassment, Bullying & Grievance Policy
- Modern Slavery Policy
- Whistleblower Policy

SALA also has several policies that set out in a transparent manner our employees' rights to remuneration and a safe working environment. These policies include;

- Disciplinary Policy
- Leave Policy
- Occupational Health & Safety Policy
- Performance Appraisal Policy & Procedure
- Recruitment Policy & Procedure
- Rehabilitation Policy & Procedure
- Working from Home Policy
- Family & Domestic Violence Leave Policy

All new and existing employees within SALA are required to complete comprehensive compliance training annually in relation to, among other regulatory obligations, identifying modern slavery and human trafficking risks.

In our supply chain

During the year ended 31 March 2024, SALA onboarded approximately 90 new suppliers to our Supply and Services Agreement which includes a Modern Slavery clause for all its suppliers to understand the applicable laws and regulations including the Act and provide confirmation of their compliance.

SALA has continued to review and analyse our potential supply chain exposure to modern slavery risks through assessing the industry risks associated with our highest categories of procurement spend. We have focussed on our categories of highest procurement spend to tailor our ongoing due diligence towards suppliers with whom we have the greatest commercial leverage.

Remediation

Our Whistleblower Policy sets out the mechanisms by which our employees can raise grievances. The policy includes protections for the whistleblower's confidentiality, as well as preventing their victimisation. No complaints related to modern slavery were reported via our whistleblower channels during the Reporting Period.

If our investigative processes determine an issue of non-compliance with our policies by one of our suppliers, we will endeavour to have our supplier identify and correct those issues. If it is apparent that an individual has suffered harm as a result of such issue, we will seek to ensure that they are 'made good' by leveraging our position with our supplier.

If a supplier fails to make progress in respect of required remediation, we may subject it to review and sanctions by leveraging our position with them, including the potential termination of our relationship.

We remain committed to providing effective remedies where our operations cause or contribute to adverse human rights impacts. Our approach to remediation is to engage directly with affected persons, and work with our business partners and other stakeholders to remediate any such impacts and consider how our internal processes can be improved to prevent similar impacts in the future.

Effectiveness

Although it is very difficult to assess the effectiveness of the steps referred to above, relevant indicators include:

- The number of issues or potential issues identified by management;
- The number of notifications of risks or issues raised by staff, the public or law enforcement agencies;
- The incidence of suppliers or other participants in the Company's industry being involved in modern slavery;
- Active monitoring of evolving industry best practices, lessons learned and areas for improvement through external events and research reports.

SALA did not identify any such issues in its operations or supply chain during the year ended 31 March 2024 independently or through the company's due diligence procedures, nor has it received any notification of such issues within its own business or those of its industry peers. Consistent with SALA's assessment of its own modern slavery risk and due diligence procedures employed by SALA, identified its key suppliers as having a low risk of modern slavery within its operations. It is acknowledged, however, the SALA operations, and those of its primary suppliers, take place within Australia and have a low incidence of modern slavery generally, we nonetheless acknowledge that the risk of modern slavery remains. This is especially the case with suppliers outside of tier 1, where access to information remains a challenge.

Further steps

Whilst we are confident that we operate in a relatively low risk business sector and our management and processes minimise the risk of modern slavery or human trafficking occurring, we are committed to further improvements and will continue to review and enhance our approach to addressing human rights risks by taking further steps in Fiscal Year 2024 which may include:

- Introducing a Supplier Code of Conduct;
- Continue to expand the awareness of our staff and partners, of the modern slavery risks in our operations and supply chain;
- Continue to update existing supplier contracts with modern slavery compliance clauses incorporated in them when they come up for renewal;
- Review our Modern Slavery Policy and Procedures to consider the overall effectiveness of our approach, including assessing our supplier onboarding processes;
- Continue to deliver the current Modern Slavery training provided to SALA employees; and
- How we improve the reach of our due diligence efforts past our tier 1 suppliers. Various options, including the use of suitable supplier management systems are being considered.

Consultation Process

As described above, SALA does not own or control other reporting entities. No consultation process was required.

Approval

This statement is approved by the Board of Directors on 27th September 2024 and signed by the President of SALA.



Kenji Mamiya