

Suttons

Modern Slavery Statement 2020

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Reporting Period

This Modern Slavery Act (MSA) Statement sets out the steps taken by the Company in the reporting period of July 1st, 2019 to June 30th, 2020 to prevent modern slavery in its business operations and supply chains.

Section One: Covered Entities

Suttons Investments Pty Limited (ACN 008 446 428) is the controlling entity for the wholly owned Suttons Group of Companies ("Suttons") and was incorporated in the Australian Capital Territory on May 31st, 1965.

Please visit our website www.suttons.com.au to see the entities that collectively form The Suttons Motors Group

Section Two: Our Structure, Operations and Supply Chains

Suttons is a family owned company first established in the early 1940's in NSW by the Late Sir Frederick Sutton, father of Laurie Sutton, Chairman, who now owns and operates the Group with his two sons, Craig and Ryan.

The main focus of Suttons is the sale of motor vehicles, parts and the related servicing for 27 motor vehicle franchises, operating mainly within the Greater Sydney area from 24 motor dealership sites. Suttons is driven by a pioneering spirit of service and our culture has been shaped by our constant concern for our customers and our 1335 employees with a commitment to excellence.

Vision

Our vision is to be recognised as the Motor Industry's leading and most trusted family dealer, enhancing the lives of our customers, our people and the communities we serve.

Values

At Suttons all employees and management across the group have a shared belief that service is taking action to create value for someone else. The essence of who we are and what it means to work at Suttons is the Spirit of Suttons, which underpins the way in which we conduct our business, interact with our stakeholders and operate as individuals. The Spirit of Suttons can be captured in one word:

P.R.I.D.E.

- Professional
- Responsive
- Innovative
- Dependable
- Exceptional

Suttons is committed to respecting human rights and strives to ensure our business activities do not directly cause or contribute to Modern Slavery. Suttons endeavour to ensure the provision of proper working environments with consideration for fairness, safety and health.



Sutton's supply chain comprises more than 800 direct suppliers of which almost 99% suppliers are located in Australia and the remaining are overseas. The majority of the overseas suppliers are Original Equipment Manufacturers.

Section Three: Our Modern Slavery Risks in Operations and Supply Chains

Suttons has adopted a targeted and risk-based approach to identifying, assessing, and addressing modern slavery risks in its business operations and supply chains. This approach is consistent with the UN Guiding Principles on Business and Human Rights and means that Suttons has and will continue to focus its actions to address modern slavery risks on the highest risk areas.

Suttons relies on a large network of third parties to provide products and services to keep our dealerships running. These include motor vehicle and parts suppliers, office cleaning services, car detailing services, marketing, and advertising companies, recruiting firms, promotional item providers, on-site security service providers, information technology consultants, accounting and law firms. Suttons acknowledges that there may be modern slavery risks in its supply chains and we will maintain a focus on mitigating these risks.

3.1 Risks in Suttons Operations

Suttons considers the risks of modern slavery practices within our business operations to be low based on two key factors: (1) all of our operating locations are based in Greater Sydney, New South Wales, and (2) our staff are employed and remunerated under the Federal and New South Wales State Awards. Suttons' Code of Conduct, Grievance Policy and Whistle Blower Policy also help to ensure that our various workplaces are professional environments that are not conducive to current or future modern slavery practices or risks.



3.2 Risks in Suttons Supply Chains

With respect to the supply chain risks, Suttons undertook an initial risk scoping exercise based on the Australian Border Force's guidance resource, Commonwealth Modern Slavery Act: Guidance for Reporting Entities, available on their website. This process considered indicators such as sector and industry risks, product and services risk and geographic risks.

Sector and Industry Risk:

Suttons has suppliers in cleaning, janitorial services, security services, construction and manufacturing, which have a higher risk of modern slavery based on information from open source resources and the International Labor Organization (ILO).

Product and Services Risk:

Suttons obtains IT equipment including laptops and computers that have a higher risk of being linked to modern slavery primarily because of sourcing of materials and hardware manufactured in countries known for their human rights and modern slavery risks.

Geographic Risks:

Suttons does not currently have any direct suppliers located in any one of the top 10 countries generally considered as having the highest risk of modern slavery practice as identified in the 2018 Global Slavery Index. We acknowledge that each of our suppliers have their own unique supply chains and that modern slavery in our indirect supply chain may inadvertently expose Suttons to modern slavery risks. Suttons plans to look further down its supply chains as it begins to prioritize higher risk suppliers and their supply chains in future reporting periods.

Section Four: Our Actions to Address Modern Slavery Risks

Actions taken by Sutton to Address Risks in Supply Chain:

Suttons has worked with CENTRL Inc and their MSA360 platform to develop and send self-assessment questionnaires (SAQ) to over 800 direct suppliers in Australia and around the world. The questionnaires ask suppliers a number of specific questions to help Suttons rate each supplier as high, medium, or low risk. The questionnaire focuses on the following nine key risk areas:

- 1. Modern Slavery Practices Risk :** Focuses on any current, recent history, or past regulatory or criminal investigations of modern slavery practices at the supplier or among senior management at the supplier.
- 2. High Country Risk :** Focuses on risks associated with having operations or workers in or sourcing supplies or workers from any one of the top ten (10) countries generally identified as having the highest risk of modern slavery practices.

- 3. Other Country Risk :** Focuses on risks associated with having operations or workers in or sourcing supplies or workers from certain countries where modern slavery practices may be more prevalent.
- 4. Industry Risk :** Focuses on risks associated with certain industries and business sectors where modern slavery practices may be more prevalent
- 5. Program Governance :** Focuses on the components of the supplier's modern slavery compliance and governance program.
- 6. Future Policy Plans :** Focuses on the supplier's future plans to build and maintain their own robust modern slavery compliance program.
- 7. Employment/Workplace Practices :** Focuses on certain employment and workplace issues that may be indicators of modern slavery practices.
- 8. Migrant Workers Risk :** Focuses on risks associated with the use of migrant workers by suppliers.
- 9. Supply Chain Management :** Focuses on supplier's policies and programs in managing modern slavery risks in their own supply chains.

Suttons has sent self - assessment questionnaires (SAQs) to its direct suppliers. Once enough SAQ responses are received, Suttons will have more insight into and a more complete profile of its supplier risks and can begin working with those suppliers identified as high risk to address and remediate those risks.

In the interim, Suttons has begun formalising its plans to address its high risk suppliers to ensure that any required remediation or other measures can be implemented timely. We have already started to identify areas of potential risk with our suppliers and include employment practices, lack of current and future Modern Slavery governance programs, industry risk and visibility of their supply chain.

Suttons will also use the results of this initial survey of its suppliers to tailor and further customise similar SAQs to be used in subsequent reporting periods to ensure that Suttons is focusing on those direct suppliers in the medium and high risk categories and on their relevant indirect suppliers.

We are also engaging with suppliers to raise awareness of modern slavery risk through required video training programs included with the SAQs.

Actions taken by Suttons to Address Risks in Operations:

The governing body and senior management of Suttons maintain overall responsibility for developing and reviewing the MSA Policy which is to be implemented within the day to day operations, monitoring its use and effectiveness, dealing with any inquiries about the MSA Policy, auditing internal controls and compliance with our obligations.

Suttons is committed to ensuring transparency in our own business and in our approach to tackling modern slavery risks throughout its supply chain. We expect the same standards from our suppliers so Suttons will provide a copy of our MSA statement and have begun to add these specific prohibitions in our contracts with suppliers against the use of forced, compulsory or trafficked labour, or any one held in slavery or servitude, whether adult or a child. Suttons is establishing a process to engage with the suppliers to all our controlled entities by investing in training of our senior management to recognise and measure Modern Slavery risks when entering into supplier agreements.

Senior Managers of reporting entities will be required to include identifying and assessing any Modern Slavery risks with new suppliers and existing suppliers in their monthly management meetings with the directors.

Suttons Human Resource department has commenced incorporating the policies and principles into our Code of Conduct, Whistle Blower Policy and Grievance Policy and on boarding employment contracts for prospective employees.

Suttons is putting in place an internal reporting plan that will allow for collaboration with and guidance to our controlled entities on modern slavery risks. Senior Managers of our controlled entities will be required to address the identification and assessment of modern slavery risk with any of their new suppliers and their existing suppliers and report on these actions in their regularly scheduled monthly management meeting with directors of the company.

Even prior to the enactment of the Modern Slavery Act, our customary practice has been to make our policies and principles of upholding the highest standards of ethical conduct in our day to day business available to all employees through our Intranet site and communicated through the Suttons Employee Handbook, which informs employees of their responsibilities such as, but not limited to, hours of work, overtime and leave entitlements.

Section Five: Assessing the Effectiveness of our Actions

Suttons internal audit team will monitor specific steps taken to assess and address Modern Slavery risks within our day to day operations and with our suppliers on an annual basis. Suttons intend to establish key performance metrics to assess our compliance with the Modern Slavery Act. Suttons will partner with our external auditors to undertake independent reviews and report on any trends identified in the Motor Industry.

Section Six: Consultation with our Entities

Suttons' entities are 100% owned by the reporting entity and controlled by the same three directors. As such, Suttons is proactively planning to direct the related entities to comply with the requirements of the MSA Policy in their day to day operations and supply chains by disseminating training videos and information to raise awareness of modern slavery risks and encourage consultation and engagement to ensure reporting of modern slavery risks.

Section Seven: Other Relevant Information

Suttons is a member of both the Motor Traders Association of NSW (MTA) and the Australian Automotive Dealer Association (AADA) which is the peak advocacy body representing Australian new car dealerships. Suttons intend to engage with these motor industry groups in 2021 to collaborate and develop best practice principles to combat modern slavery in similar industry sectors with similar supply chains.

Additional: COVID -19 IMPACT

The COVID – 19 pandemic has increased the risk of modern slavery due to business closures and their related suppliers having to change their working hours. The Global pandemic impacted Australia in March 2020, three months before our fiscal year end. As a result the specific risks of modern slavery emerging from COVID – 19 and Sutton's consideration and assessment of those risks will be incorporated into our FY2021 Modern Slavery Statement. During the reporting period Suttons considered the impact on its suppliers, specifically payment terms and support for additional services such as cleaning and supply of sanitizer and face masks and rent relief for its tenanted buildings.

Suttons ensured its business was compliant with all Federal and State COVID – 19 work restrictions to ensure the wellbeing and health of its employees and communities.

PRINCIPAL GOVERNING BODY APPROVAL

This statement, as required under Section 13 of the Modern Slavery Act 2018, was reviewed and approved by the Board of Suttons Investments Pty Limited and its controlled entities on **March 31, 2021**



Signed by **Laurie Frederick Sutton, Chairman**