

An aerial photograph of a resort pool area. In the center is a large, kidney-shaped swimming pool with a blue tiled interior. To the left of the pool is a building with a colorful, multi-colored facade. To the right is a long, low building with a dark roof and large glass windows. The pool area is surrounded by numerous palm trees and other tropical plants. A large blue canopy is visible on the right side of the pool. The overall scene is bright and sunny.

**RACV**

# Modern Slavery Statement

Under the Modern Slavery Act 2018 (Cth)

1 JULY 2023 – 30 JUNE 2024



This Modern Slavery Statement was approved by the Board of Royal Automobile Club of Victoria (RACV) Limited ("RACV") ABN 44 004 060 833 in its capacity as the principal governing body of RACV on 17th December 2024.

Pursuant to the requirements of the *Modern Slavery Act 2018* (Cth), the contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person.

This statement is signed by Greg Robinson in his role as President and Chairman of RACV on 17th December 2024.



**Greg Robinson**  
President and Chairman  
17 December 2024







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(MANDATORY CRITERIA – S.16(1)(A), (B) AND (F))

## Our structure, operations and supply chains

Royal Automobile Club of Victoria (RACV) Limited (“RACV”) is pleased to submit its fifth annual statement pursuant to the *Modern Slavery Act 2018* (Cth) (“the Act”). This Statement describes steps RACV is continuing to take to identify, assess, and address potential areas of modern slavery risk in our operations and supply chains. All numbers, statistics and facts described in this Statement are as at 30 June 2024, unless otherwise stated.

### Core operations – Who we are, what we do and our team

RACV is a mutual organisation, providing services to more than 2,245,000 members in Victoria and a growing national customer base. RACV exists to improve lives in the areas of motoring and mobility, home, cleaner energy, and leisure.

We provide a diverse range of products and services, with our core business activities including:

- Seven holiday resorts in Victoria and Queensland, two RACV Club and leisure facilities in Victoria, and a hotel in Hobart.
- A network of 16 retail stores and agencies throughout metropolitan and regional Victoria.

- Towing, transport and emergency roadside assistance services for our members.
- Distribution and installation of Solar Power Systems (through RACV Solar).
- RACV Home and Motor Insurance and personal financial solutions.
- Home trades services, property services, emergency home assistance.

Our operations serve members and customers ranging from individuals and small businesses to large enterprises.

RACV's eight agencies are operated by local businesses. Staff operating in agencies operated by local regional businesses are directly employed by the operator.

We have approximately 4,000 team members working across our offices, resorts, retail stores and other operations. Our staff are employed under applicable modern awards, enterprise agreements or common law employment contracts.

Most of our staff are permanent employees engaged on a full or part-time basis. Around a quarter are engaged on a casual basis. Approximately 39 per cent of our total team are in professional and administrative roles, and around 33 per cent fulfill roles in hospitality positions at our leisure facilities and resorts.

In addition, we engage over 1,000 contractors, either directly or indirectly, for the provision of ad hoc service delivery tasks such as towing, roadside assistance, emergency home assistance, home trades and solar installation on behalf of the RACV Group.

## Corporate Structure – including controlled entities and consultation

RACV is the parent company that owns and controls the following operating companies which together form the RACV Group:

**Table one: RACV owned and controlled entities**

Company Name	Core Business / Purpose
<b>RACV Holdings Pty Ltd</b>	(Non-trading holding company)
<b>RACV Insurance Services Pty Ltd</b>	Distribution of RACV Home and Motor Insurance
<b>R.A.C.V. Finance Limited</b>	RACV Personal Loans
<b>RACV Investment Holdings Pty Ltd</b>	RACV's investment portfolio and joint venture investments
<b>Club Tasmania Holdings Pty Ltd</b>	Owns and operates RACV Hobart Hotel
<b>Arevo Pty Ltd</b>	Real-time journey planning
<b>Intelematics Australia Pty Limited</b>	Telematics and connected vehicle services
<b>RACV Travel and Experiences Pty Ltd</b>	Distribution and provision of holidays, travel experiences and member benefits
<b>Nationwide Group Pty Ltd</b> (and its subsidiaries) <sup>1</sup>	Towing, transport and emergency roadside assistance services
<b>Home Trades Hub Australia Pty Ltd</b> (and its subsidiaries) <sup>2</sup>	Home trades services, Property services, Emergency home assistance

All the above owned and controlled RACV Group entities have been consulted in relation to the contents of this Statement and are subject to RACV's response framework for identifying, assessing and addressing potential modern slavery risks. The above individual entities are specifically referenced where such differentiation is appropriate throughout this Statement to provide more accurate information in relation to a reporting requirement. The Appendix lists entities that RACV held a non-controlling interest/investment in during the financial year ending 30 June 2024.

1. Eastern Van Services Pty Ltd, Nationwide Roadside Services Pty Ltd, 134 Tow Pty Ltd, Nationwide Towing & Transport Pty Ltd, Fleet Company 2017 Pty Ltd, Leasetek Pty Ltd, Truck Tow Pty Ltd, Nationwide WA Pty Ltd

2. RACV Security Pty Ltd, Club Home Response Pty Ltd, Property Safe Holdings Pty Ltd, Property Safe (Aus) Pty Ltd, PropertySafe Pty Ltd, Property Safe Administration Pty Ltd, Property Safe Ltd, Maintenance Manager Pty Ltd, Rapid Building Inspections Pty Ltd, Rapid Building Inspections IP Pty Ltd, RACV Solar Pty Ltd, Bedlam Enterprises Pty Ltd. (As flagged in our FY23 Statement, RACV Solar Pty Ltd (and its subsidiary Bedlam Enterprises Pty Ltd) was incorporated into the operations of Home Trades Hub Australia Pty Ltd during the FY24 reporting period).



## Key Characteristics of RACV's supply chains

RACV's supply chain did not change significantly from the previous reporting period, including in terms of the total number and type of direct suppliers.

RACV engaged with over 4,000 unique suppliers which provided a broad range of goods and services. Approximately 97 per cent of these are local Australian suppliers.

A significant proportion of our overall procurement spend relates to our leisure / tourism business activities, along with our home and roadside assistance services.

Significant investment in improving and transforming RACV's properties resulted in an increased spend on construction and property fit out. Each year RACV undertakes extensive activity of this kind including new builds, refurbishments, fitouts and maintaining existing assets across our property portfolio in Victoria, Queensland and Tasmania. During the reporting period, more than 350 individual works projects of this kind were undertaken.

Increased overall procurement spend also occurred in the categories of Facilities Management, Roadside Assistance services, and Marketing.

As described in previous statements, our purchasing practices generally involve sourcing goods either directly from local producers or through Australian distributors and service providers. Many of these products may have significant inputs from international locations at deeper tiers of the supply chain, including China and other major global manufacturing hubs.

International supplier composition has remained consistent with the previous reporting period.

Some suppliers, predominantly in support services for marketing and information technology (IT), are located offshore in Europe, Hong Kong, India, Sri Lanka, New Zealand, North America, the Philippines, Singapore, South Korea, Vietnam, and the United Kingdom.

RACV's major spend areas are outlined below:

- Software providers
- Fleet services
- Home trades contractors
- Technology and IT services
- Marketing, advertising and media
- Professional services (including legal, auditing and financial advisors)
- Recruitment and Human Resources (HR) services
- Construction/fit out equipment and services

Industry categories where RACV engaged with the largest number of individual (unique) suppliers include fleet services, facilities management, technology and IT services, construction/fit out services and equipment, travel and accommodation services, ticketing services, food and beverages, software support, professional services, and dry goods. Other significant supplier categories from a modern slavery risk perspective (albeit not necessarily with relatively high spend amounts within those categories) include:

- Staff uniforms providers
- Professional cleaning services for our facilities
- Hospitality amenities
- Energy and electricity products and services
- Security services
- Logistics





(MANDATORY CRITERIA – S.16(1)(C) AND (D))

# Identifying, assessing and addressing potential modern slavery risks

## In our supply chains

RACV did not assess any material change to our overall elevated risk categories compared to previous assessments. This was confirmed through the application of the modern slavery risk model that we primarily use for our supply chain assessment, which has been adjusted to reflect the Walk Free Foundation's Global Slavery Index (updated in May 2023).

This year's comprehensive risk assessment identified approximately 1,700 suppliers (around 40 per cent of which are non-recurring spend) providing goods or services that are assessed, at an industry level, as having inherently elevated modern slavery risk, including:

- Building Construction
- Property fit out
- Technology (IT hardware)
- Facilities management
- Cleaning
- Fresh food produce (Australian)
- Other food items – including rice, fish, and products derived from cocoa
- Personal Protective Equipment (PPE)
- Garments and apparel (including staff uniforms)
- Solar panels, inverters and high-tech batteries
- Recruitment agencies

## Risks relating to imported solar panels – RACV Solar

As we have acknowledged in prior Statements, one of the most material risks in RACV's supply chain is our procurement of solar panels. Our wholly-owned subsidiary, RACV Solar is involved in the distribution and installation of solar power systems meaning that we have an ongoing operational reliance on this product line.

We recognise the tension that exists between our support for the green energy transition, whilst ensuring that our procurement of renewable technologies does not entail an unacceptably high modern slavery risk. For instance, the recently released 2023 Global Slavery Index's ('GSI') spotlight on Australia has, for the first time, included solar panels imported from China as one of the top three highest value at-risk products imported into Australia, indicating the widespread nature of the risk.<sup>3</sup> The 2023 GSI has aptly described the risks in the solar supply chain as follows:

*"Forced labour permeates all businesses operating in Uyghur region, including those that are part of the solar panel supply chain, from the collection of raw quartz and its purification into solar grade polysilicon to its transformation into ingots, wafers, cells, and eventually solar panel modules"*<sup>4</sup>

As we have noted in prior statements, RACV is also aware of the increased bifurcation of solar supply chains across Southeast Asia, following the implementation of the *Uyghur Forced Labor Prevention Act* ('UFLPA') in the US.<sup>5</sup> We recognise that this legislation has inadvertently created potential additional risks of tainted solar products being directed towards Australian markets to avoid importation bans under the UFLPA.

In terms of our purchasing practices, RACV Solar primarily sources solar panels through Australian third-party wholesalers and distributors. We also procure a number of panels directly from a small number of manufacturers.

RACV's direct relationship with one major solar panel manufacturer means that we are well placed to pursue increased transparency over our supply chain, and to conduct enhanced and ongoing due diligence. In FY24, RACV fostered a strong working relationship with our primary manufacturing supplier, successfully procuring panel traceability reports from this supplier. These reports provided assurance that our solar panels are being manufactured outside the Xinjiang Uyghur Autonomous Region. As an additional risk management process, RACV has continued regular manual screening of the UFLPA Entity List and media reports to remain abreast of any specific linkages between our primary solar supplier and allegations of forced labour risks.

In terms of the panels sourced from third-party solar panel wholesalers, we have oversight over the brands (manufacturers) on-sold to us. This visibility means that

we can independently assess the general modern slavery risks associated with the brands we purchase. In FY24, we continued to conduct desktop due diligence on our top 10 suppliers (by spend) in our solar and battery operations. In future reporting periods, we will explore the possibility of working with our direct wholesale suppliers to request additional traceability reports from the solar panel manufacturers (our tier 2 suppliers).

## Supplier-specific due diligence & engagement

In this reporting period, across suppliers to all of our business lines, we conducted supplier specific due diligence on 65 unique entities, which represented approximately 60 per cent of total suppliers assessed in our "high" risk category and approximately 24 per cent of suppliers in the "medium" risk category.

We issued new suppliers with due diligence questionnaires, which assess modern slavery risk (amongst other issues). Suppliers are given a due diligence score based on their responses. Selected suppliers also receive an Orbis ESG score. These scores are combined to give an overall risk rating score from 0-100. The aim is to ensure that gaps identified in the due diligence and supplier onboarding process are addressed.

In addition to these ongoing measures, RACV also took the additional step of directly engaging with one of our hospitality suppliers that provides cleaning services to our leisure business. This engagement is indicative of our business' ongoing recognition of the elevated inherent risks of modern slavery in the hospitality sector, which we have described in prior Statements. As part of this engagement, we worked with the entity to understand their processes and policies for modern slavery risk management. We also completed an independent review of their most recent Modern Slavery Statement, to better understand the sufficiency of their modern slavery response. RACV is satisfied that this supplier is appropriately mitigating the risks inherent to their industry of operation.

## Procurement management system

During the reporting period, we commenced integration of our new procurement platform across our wholly owned subsidiaries. The eventual group-wide harmonisation of RACV's procurement management will enhance supplier lifecycle management and help to automate key processes such as initial and ongoing supplier engagement, recording and tracking of supplier obligations, and supplier due diligence. It will also provide more extensive modern slavery due diligence via the inclusion of a full suite of mandatory modern slavery questions in due diligence questionnaires completed by suppliers during onboarding, contract renewal and on a pre-defined recurring basis. The new platform also enables broader environmental, social and governance (ESG) due diligence via Moody's Orbis platform.

3. <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

4. <https://www.walkfree.org/global-slavery-index/findings/importing-risk/>

5. See further, A Crawford, LT Murphy et al, 'Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing' (Sheffield Hallam University, 2023). Available at: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/over-exposed>



## Ongoing media screening

RACV continues to monitor emerging modern slavery risks through the ongoing publication of a quarterly bulletin which is circulated to key management summarising news articles, press releases and policy changes, with a focus on risks in the Australian labour force and risks relating to products in our supply chain and countries from which we import goods.

## In our operations

As an Australian company with all core operations situated onshore, we have not identified any area(s) of relatively elevated operational modern slavery risk.

No actual or suspected instances of modern slavery in our operations were identified, reported, or otherwise brought to our attention during the reporting period.

However, we continue to recognise that, at an industry level within Australia, hospitality services (including those in connection with accommodation and tourism facilities) are characterised by inherent risk factors including jobs with lower entry barriers that are filled by lower skilled workers and a proportionally higher foreign migrant workforce.

Consistent with our well-established approach that continues to be implemented as with previous reporting periods, RACV's overall risk mitigation framework includes:

- Pre-employment checks and Induction training.
  - Staff undergo a right to work check as well as mandatory compliance training to understand their rights and responsibilities in the workplace.
- Payment of all staff at or above award, with salary benchmarking to ensure staff are paid fairly.
- Provision of specific modern slavery training and awareness.
- Well established whistleblower policies, grievance procedures and risk control mechanisms, which are subject to regular review to ensure that they remain fit for purpose.
- Active participation in externally operated WorkSafe audits.

## Policy and governance framework

RACV's internal policy and governance framework for responding to modern slavery risk has now been fully implemented for several reporting periods. Relevant policies continue to include:

- RACV Code of Conduct
- Fair Treatment Policy
- Health, Safety and Wellbeing Policy
- Diversity Equity and Inclusion Policy
- Hours of Work Policy

- Fitness for Work Policy
- Flexible Work Arrangements Policy
- Employee Assistance Policy
- Complaints Disputes and Grievances Policy
- Whistleblower Policy

RACV continues to implement periodic initiatives aimed at greater employee awareness and acknowledgment of RACV's policies. New and existing employees complete appropriate and ongoing training on workplace related risks, including mandatory compliance training.

A focus for the reporting period was improved policy harmonisation with the rest of the RACV Group for our two largest subsidiaries, Nationwide and HTHA.

In relation to in-force grievance procedures, concerns may be raised:

- Anonymously with FairCall, RACV's externally managed whistleblowing reporting service under the Whistleblower Policy.
- Directly with managers, line managers and RACV's People and Culture function under our Complaints, Disputes and Grievances Policy.
- Directly with People and Culture under our Fair Treatment Policy.
- Via the RACV Whistleblower Investigation Officer.

These policies and reporting mechanisms are subject to regular review to ensure they remain fit for purpose for reporting complaints and concerns relating to potential modern slavery issues.

## Standard contract provisions addressing modern slavery issues

Aligned with our established internal policy and governance framework, RACV now has a well embedded goods and service template agreement which specifically requires our suppliers to address modern slavery risk issues.

Express supplier obligations under the agreement include:

- Compliance with modern slavery laws and regulations and that none of their employees or subcontractors have been convicted or investigated for modern slavery offences.
- Maintaining appropriate records about their risks of modern slavery, compliance with modern slavery related legislation and information to assist RACV in mapping our supply chain.
- Agreeing to submit to modern slavery related audits conducted by RACV or our appointed representative.
- Suppliers that use subcontracted labour or services are required to ensure that subcontractors and related employees comply with modern slavery legislation, to ensure consistent standards are cascaded down our supply chain.

RACV's standard agreement also incorporates a right of termination if the supplier fails to comply with modern slavery legislation (i.e. reporting accurately and in a timely fashion under the Act).

Implementation of these standard terms is ongoing across the RACV Group and we will continue to rollout these terms for Nationwide suppliers in forthcoming reporting periods.

### Industry engagement and collaboration

RACV remains actively involved in external events aimed at improving our overall modern slavery response. Throughout the reporting period, RACV representatives attended several industry training and information events including:

- Modern Slavery and Assessing Risk in the Push to Net Zero (webinar session with GRC Solutions).
- The Future of Modern Slavery Reporting and Smarter Due Diligence for Teams (webinar sessions with Fair Supply).
- KPMG Chief Risk Officer Forum – outlining recommended actions to mature approaches to modern slavery due diligence.

### Internal training and capacity building

RACV's modern slavery training is mandatory, with refresher frequency set at every two years.

Training is conducted through an online module which is updated yearly to maintain up-to-date content. Modules were updated with new content from the new NSW Anti-Slavery Commissioner's public resources. Topics covered include:

- Guidance on what modern slavery practices look like, including distinguishing modern slavery from other forms of labour exploitation, to assist staff in identifying modern slavery in their day-to-day roles.
- Contextualising the prevalence of modern slavery, including within Australia.
- Modern slavery red flags, with a focus on identifying suspicious employment practices and vulnerable workers.
- Practical actions that team members can take to raise concerns.

Relevant employees of RACV had a 97% completion rate for our modern slavery training. We continue to ensure that our staff remain up to date with the required compliance training, including on modern slavery issues.

The provision of compliance training to team members at RACV's subsidiaries was implemented over the reporting period as part of the Group-wide harmonisation and integration of our modern slavery response framework. Employees from both HTHA and Nationwide subsidiaries undertook Modern Slavery training.

### Remedial action

RACV has previously reported on our development of redress principles for significant non-compliance with our basic expectations for managing modern slavery risk. These principles reflect RACV's preference of working collaboratively with suppliers to address risk where practical to do so. However, in more critical incidences, our redress principles envisage more definitive action, including:

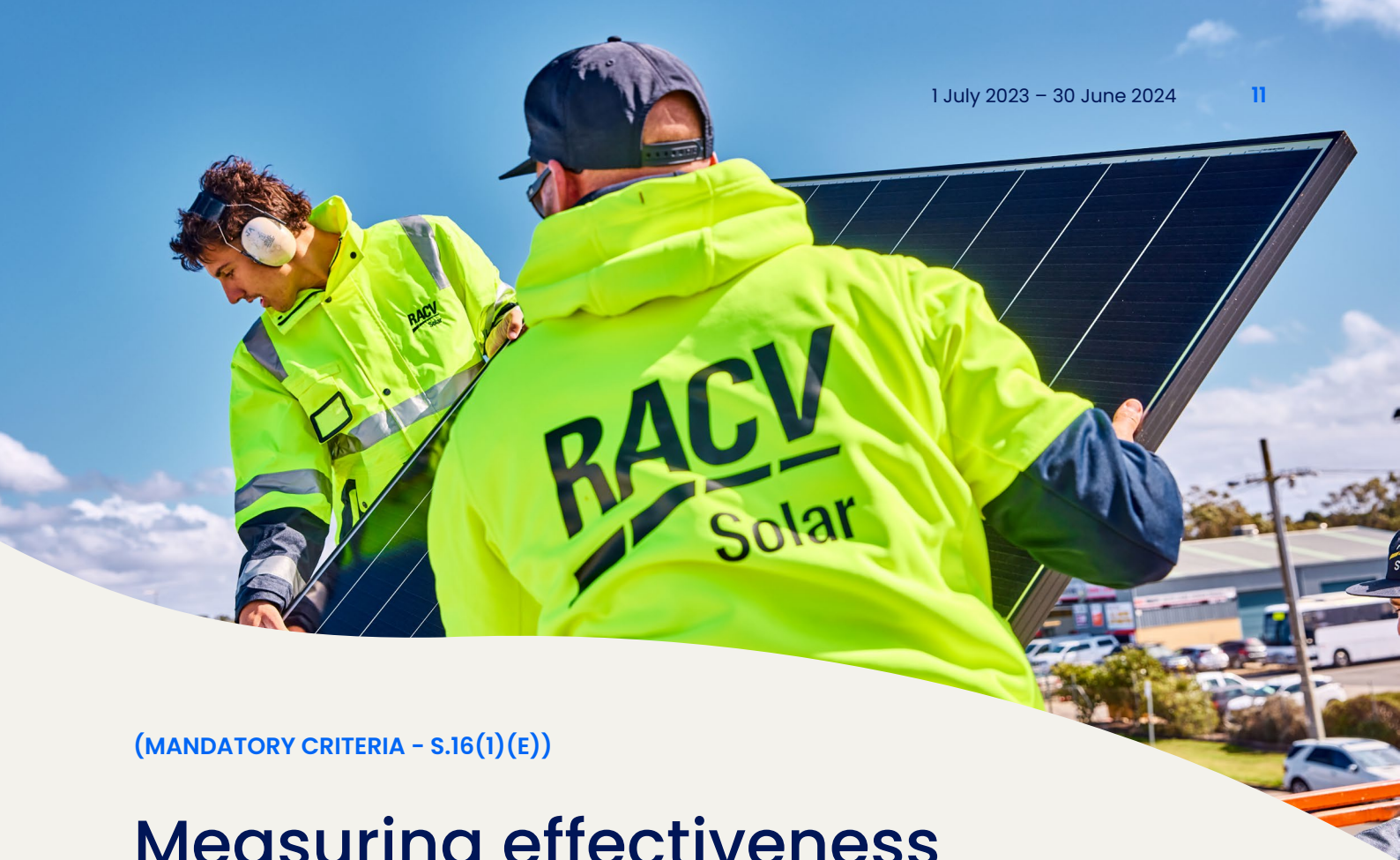
- RACV may engage, or require the supplier to engage, an independent third party to audit the supplier and certify to remediation of identified risks.
- Potential suspension of active purchasing from a supplier pending demonstration that the supplier has addressed identified areas of unmitigated risks, or a genuine commitment to doing so.
- RACV's preparedness to exercise contract termination rights in sufficiently serious cases.

As in previous years, RACV was again in a position this reporting period where circumstances for practical application of these principles arose:

We continue to have an ongoing relationship with a linen service provider to our Leisure division, which had issues of worker underpayments when managed by the previous owners. Since the new owners have taken over the business, they have actively worked to address gaps and resolve concern. We maintained contact with this supplier into this reporting period to follow through the remedial action plan to completion. In the first half of the reporting period, the supplier provided a statement regarding the situation and the work being undertaken to address the incident, along with a newly updated Human Rights and Social Responsibility Policy. We deemed these actions to be sufficiently proportional and otherwise appropriate to close the matter.

During environmental scanning activities, RACV uncovered an instance of alleged worker exploitation from a security services supplier. This incident related to apparent underpayments of migrant workers over the 2022 Financial Year, which was raised and reported with the Fair Work Ombudsman in this reporting period. One of our subsidiaries had a small contractual engagement with this supplier during the 2022/23 Financial Year. No subsequent engagement had occurred. After internal consideration, RACV has decided to ensure that there is no further commercial engagement with this supplier, unless confirmation of appropriate remedial action occurs, and robust risk mitigation measures are put in place.





(MANDATORY CRITERIA – S.16(1)(E))

## Measuring effectiveness

RACV considers that a key feature of an effective modern slavery response is one that looks beyond each individual reporting period. Part of such a continuous improvement approach is to demonstrate continuity of performance between planned measures described for an upcoming reporting period and what is achieved. Accordingly, RACV has compiled the following list of such planned measures from last year's Statement and provided corresponding details on actual performance:

**Table Two: Progress for FY24**

Planned focus area for FY24 (per our 2023 Statement) (p.14)	Progress Update for this Reporting Period
<b>Staying connected to credible external sources of high-quality modern slavery risk information and research.</b>	<p><b>Complete (and ongoing)</b></p> <p>Engaged with educational resources and updates developed by leading organisations including the International Labor Organization, the Walk Free Foundation, and Fair Work Australia.</p> <p>RACV commenced early discussions<sup>6</sup> with an independent not-for-profit organisation dedicated to improving workers' conditions in high risk industries. RACV will continue to explore the feasibility of engagement with this organisation in the next reporting period.</p> <p>Ongoing monitoring of relevant news and articles from reputable sources and information pieces from external media / data scraping providers.</p>

6. This occurred after 30 June 2024, but prior to the lodgement of this Statement.

Planned focus area for FY24 (per our 2023 Statement) (p.14)	Progress Update for this Reporting Period
<p><b>Continuing to leverage long-term relationships with suppliers with the objective of appropriately addressing identified concerns and monitoring progress with agreed risk mitigation activities.</b></p>	<p><b>Complete (and ongoing)</b></p> <p>As described above, remedial action was required in relation to two (2) suppliers identified as having underpaid employees.</p> <p>In addition, continuing engagement with suppliers in our solar and battery operations is improving the transparency of our supply chains in this industry.</p>
<p><b>Expanding enhanced procurement practices to wholly owned subsidiaries as part of the procurement platform rollout.</b></p>	<p><b>In Progress</b></p> <p>Commenced roll out of our procurement software system, Jaggaer, with Nationwide Group Pty Ltd and Intelematics. The rollout for the rest of the RACV Group will continue in FY25.</p>
<p><b>Continuing to mature our range of management responses available to mitigate identified modern slavery risks.</b></p>	<p><b>In Progress</b></p> <p>Improvements are continuing with how we onboard suppliers using a risk-based approach. The enhancement of recording and tracking modern slavery issues and risks in our overall monthly risk management reporting. Continuation of modern slavery risk management awareness training and formal monitoring of completion.</p>
<p><b>Engaging with peers, industry consultants and other organisations to help inform our preparations for potential changes to our obligations under the Modern Slavery Act 2018, stemming from recommendations published in FY23.</b></p>	<p><b>In Progress</b></p> <p>No amendments to the Act have occurred.</p> <p>RACV explored the use of a third-party risk management platform to monitor third party risk and apply desktop questionnaires and audits.</p> <p>Monitored news articles and the Australian Attorney General's website for updates on modern slavery incidents and risk response guidance possibly relevant to RACV's supply chain.</p> <p>Regulatory changes subject to ongoing monitoring by RACV Regulatory Counsel.</p>
<p><b>Develop "action plans" with each RACV owned and controlled entity to operationalise responsibilities, including incorporation of modern slavery clauses into supplier contracts and provision of comprehensive training to employees.</b></p>	<p><b>In Progress</b></p> <p>We integrated modern slavery training across our Nationwide and HTHA subsidiaries.</p> <p>As noted above, we are still operationalising the rollout of standard modern slavery contract provisions to our subsidiaries.</p>
<p><b>Focusing on solar and battery supplier due diligence and monitoring.</b></p>	<p><b>In Progress</b></p> <p>As described above, we leveraged our relationship with our primary solar panel manufacturer to increase our transparency of the supply chain of individual solar products procured for RACV Solar. We will continue to engage with this supplier to develop a collaborative approach to modern slavery risk management.</p> <p>We also conducted desktop due diligence on our top 10 solar and battery suppliers (by spend).</p>
<p><b>Increase supplier adoption of the RACV Goods and Service Agreement, including rollout for wholly owned subsidiaries.</b></p>	<p><b>Complete (and ongoing)</b></p> <p>Contract renewals with new terms that expressly address modern slavery issues continued over the reporting period.</p>



## (REPORTING CRITERIA – S.16(1)(G))

# RACV's Planned focus areas for FY25

RACV is committed to continuously improving the Group's approach to assessing and addressing modern slavery in our operations and supply chains. As part of this, RACV has identified the following actions as priority areas that we will be seeking to implement in the FY25 reporting period and beyond.<sup>7</sup>

**Table Three: Priority Areas for FY25**

Pillar	Principles	Planned Activities
<b>Knowledge / capability building</b>	RACV will invest in people capability to identify and manage modern slavery risk	<ul style="list-style-type: none"> <li>Enhance access to modern slavery training across relevant RACV and subsidiary roles.</li> <li>Deepen relationships with NGOs in specific high-risk areas, business organisations and other groups participating in dialogue on modern slavery.</li> </ul>
<b>Governance framework</b>	Governance of modern slavery risk will be consistent with risk exposure	<ul style="list-style-type: none"> <li>Continue to monitor proposed changes to the <i>Modern Slavery Act 2018</i> (Cth) and (as relevant) plan and implement any changes according to regulatory timelines.</li> <li>Revisit RACV Modern Slavery Guidelines in light of developing practice.</li> </ul>
<b>Risk identification</b>	RACV's investment in modern slavery risk identification will be: <ul style="list-style-type: none"> <li>appropriate to its operations and supplier relationships and consistent with community expectations</li> <li>part of supplier management lifecycle</li> </ul>	<ul style="list-style-type: none"> <li>Embed improved approach to modern slavery risk monitoring, including further due diligence for higher risk suppliers.</li> <li>Integrate centralised procurement processes across wholly owned subsidiaries to allow for standardised application of modern slavery risk assessment tools across the RACV Group.</li> <li>Monitor developments in third-party environmental supplier screening tools to potentially replace current manual screening.</li> </ul>
<b>Risk mitigation</b>	RACV's investment in modern slavery risk mitigation will be appropriate to its operations and supplier relationships, consistent with community expectations and part of the supplier management lifecycle	<ul style="list-style-type: none"> <li>Develop and implement a standardised approach to incoming modern slavery questionnaires and information requests.</li> <li>Continue to embed and maintain open communications with stakeholders when issues arise or circumstances change.</li> <li>Promote the use of RACV's reporting mechanism, Risk Hub, to raise modern slavery-related issues and encourage business accountability.</li> </ul>
<b>Commitment to ethical principles / learning</b>	RACV will progress its modern slavery risk understanding and risk management maturity	<ul style="list-style-type: none"> <li>Fulfill commitments made in RACV's 2024 Modern Slavery Statement.</li> </ul>

<sup>7</sup> **Disclaimer:** This Modern Slavery Statement contains certain forward-looking statements about anticipated modern slavery actions planned to be undertaken by RACV in the next reporting period. These statements reflect RACV's reasonable expectations as at the date of preparing this Statement. Such forward-looking statements are predictive and are subject to risks, uncertainties and other factors that could cause actual action to differ from planned activities. Any forward looking statements are not to be taken as guarantees, representations, warranties or assurance of RACV's future performance or certainty that planned actions will be achieved.

# Appendix One – RACV list of entities with non-controlling interest

In addition to our owned and controlled entities detailed above at Table One, RACV also held non-controlling interest in the following entities as at 30 June 2024:

- Insurance Manufacturers of Australia Pty Limited
- Australian Motoring Services Pty Ltd
- Club Assets Pty Ltd
- Club Assist Corporation Pty Ltd
- Vehicle Repairhub Pty Limited
- Deep Blue Company Pty Ltd
- Real Estate Agent Select Limited
- JET Charge Pty Ltd
- Before you Buy Pty Ltd
- Designer Journeys Pty Ltd
- Vendor Compare Pty Ltd trading as Proptech Labs
- Narrabundah Technology Holdings Pty Ltd
- Landchecker Holdings Pty Ltd<sup>8</sup>

8. As disclosed in our 2024 Annual Report, this entity is categorised as a joint venture. Despite holding a majority of the voting rights, RACV does not have control over Landchecker Holdings Pty Ltd due to its inability to unilaterally direct the relevant activities without agreement from the other shareholder, as required by AASB 10 Consolidated Financial Statements. Specifically, the shareholder agreement between RACV and our joint venture partner does not grant RACV authority to control the day-to-day operational management of the entity.











Level 7, 485 Bourke Street  
Melbourne Victoria 3000

Royal Automobile Club of Victoria  
(RACV) Limited  
ABN 44 004 060 833

[racv.com.au](http://racv.com.au)

**RACV**