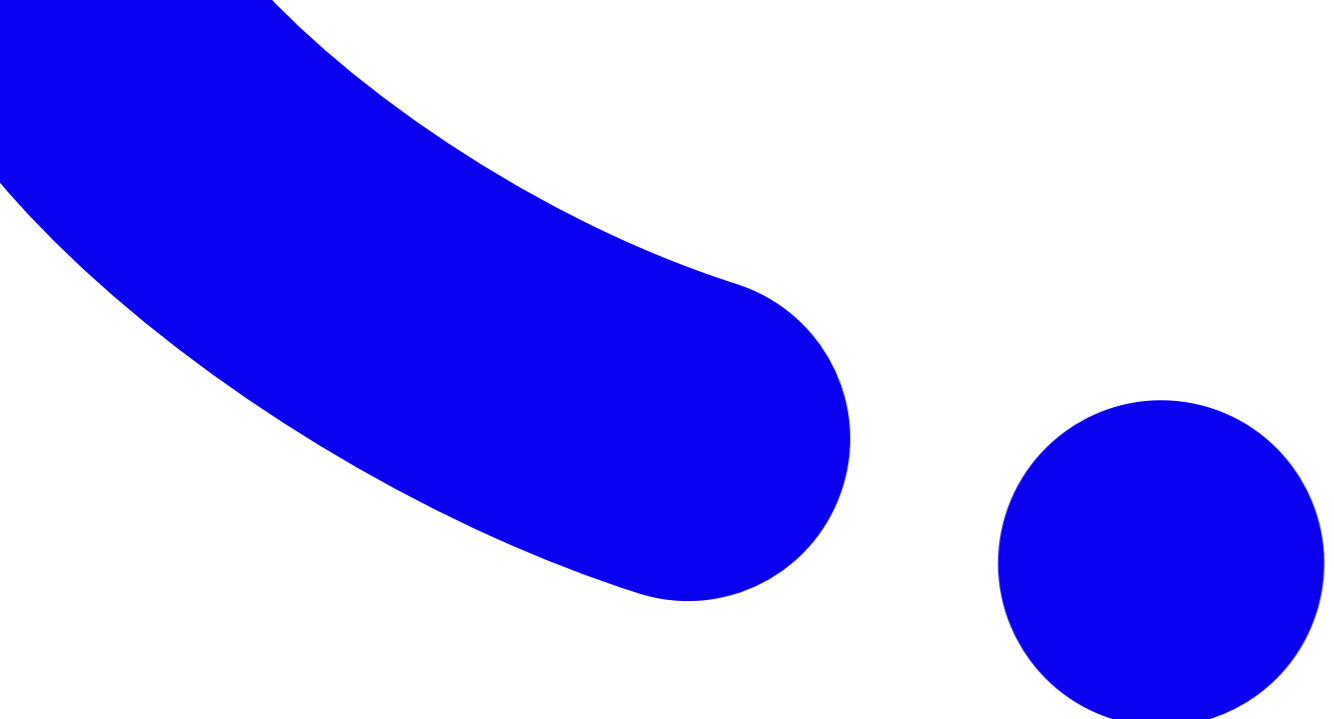




# **2020 Modern Slavery Statement**



This 2020 Modern Slavery Statement (Statement) covers the activities of the National Roads and Motorists' Association Limited ACN 000 010 506 (the "NRMA"), undertaken to understand and implement actions to minimise the risk of modern slavery in our operations and supply chains for the period 1 July 2019 to 30 June 2020.

Throughout the Statement the use of 'the NRMA' refers to the operational divisions of NRMA Corporate and Membership, NRMA Motoring, and the wholly owned controlled entities of NRMA Marine, NRMA Parks and Resorts and Thrifty.

This is the 2020 Modern Slavery Statement ('Statement') for the NRMA. The Statement has been prepared in accordance with the requirements of the Commonwealth Modern Slavery Act 2018.

The Statement was approved by the Board of Directors of the NRMA at the board meeting held on 26 February 2021.

Signed in accordance with a resolution of the Board of Directors.

Tim Trumper  
NRMA Chair

26 February 2021

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# Foreword

As an active supporter of the United Nations Sustainability Goals (SDGs), the NRMA is committed to reducing the risk of modern slavery within our supply chains and business operations. The purpose of this statement is to outline our approach to ensuring that NRMA develops and progressively implements and enhances our frameworks and processes to minimise the risk of modern slavery in our business operations and supply chains and to represent our future plans for furthering eradication.

Led by the NRMA Group CFO, the compilation of this statement has been undertaken by the NRMA Modern Slavery Working Group (MSWG) which comprises key stakeholders from legal, risk, procurement, NRMA Corporate and Membership, NRMA Motoring and the wholly owned controlled entities of NRMA Marine, NRMA Parks and Resorts and Thrifty. Consultation with identified controlled entity stakeholders was conducted to ensure accurate representation of activities and procedures undertaken to address the risk of modern slavery throughout our supply chains and gain agreement with regard to the Statement's content.

The NRMA recognises that modern slavery can occur in many forms. It can include slavery, servitude, human trafficking, forced marriage and labour, debt bondage, child labour and deceptive recruitment practices. An estimated 40.3 million people are in modern slavery today. A disproportionate number are women who are estimated to make up 71% of modern slavery victims. The impact of COVID-19 has heightened the risks for those already exploited, increasing the risks of exploitation, disrupting response efforts and the ability to fully monitor supply chains.<sup>1</sup>

The United Nations Special Rapporteur on Contemporary Forms of Slavery warns that the growing casualisation of labour amplifies modern slavery risks. In combination with the global economic crisis caused by the pandemic we expect higher unemployment to lead to increased poverty and increase the risk of modern slavery for many. Lockdowns and the closure of education facilities mean many vulnerable children will be at a higher risk of child labour and child marriage in some communities.<sup>2</sup>

Whilst Australia is not considered a high risk country, 'The Global Slavery Index 2018' estimates that in 2016 there were approximately 15,000 people living in conditions of modern slavery within Australia itself.<sup>3</sup> High risk industries included, cleaning, construction, agriculture, hospitality, food and domestic services. We cannot become complacent with regard to Australian supply chains.

The advent and ongoing impacts of the COVID-19 global pandemic have directly affected the NRMA and its controlled entities. Lockdowns and travel restrictions led to a significant decline in many of our tourism and leisure businesses in the latter half of FY20, forcing the business to pivot and focus on keeping our staff, our customers and Members safe. This redirected and necessary focus saw activities centre on our core services such as roadside assistance, working with community partners and vulnerable members of the community and restructuring existing businesses to mitigate the impact of the pandemic.

<sup>1</sup> [ourworld.unu.edu/en/the-impact-of-covid-19-on-modern-slavery](https://ourworld.unu.edu/en/the-impact-of-covid-19-on-modern-slavery)  
<sup>2</sup> [ourworld.unu.edu/en/the-impact-of-covid-19-on-modern-slavery](https://ourworld.unu.edu/en/the-impact-of-covid-19-on-modern-slavery)  
<sup>3</sup> [globalslaveryindex.org/2018/findings/country-studies/australia/](https://globalslaveryindex.org/2018/findings/country-studies/australia/)

# Message from our Group CEO

## FY20 The year that was

Our centenary year was to be a year of celebration however, 2020 did not turn out as we expected. Instead it presented us and the world with many challenges. Commencing in late 2019, bushfires and floods devastated regional communities and resulted in many of the NRMA Group's regional businesses being forced to close temporarily to keep our customers and Members safe. As devastated communities and our businesses sought to rebuild we were hit with another blow— the COVID-19 pandemic.

We, like the rest of the world have sought to adapt and do what we do best — help. We set up what was known internally as Project Light Horse (in honour of our beginnings) a program to put our people, our vehicles and our other assets to practical use. Light Horse saw us partner with community organisations to deliver meals and medicine, support those in isolation, and provide free vehicles to essential workers. Many of our Parks and Resorts offered accommodation to essential workers and our roadside crews were stationed near hospitals, prioritising calls from health workers. We stringently implemented COVID safe measures across all our operations and made arrangements for our people to work from home wherever possible.

Through our own experiences of the pandemic we are very aware that the economic damage caused by the pandemic has, and will continue to mean that communities may be in positions of vulnerability for the foreseeable future. This in turn can increase the risk of modern slavery across locations and industries.

The World Bank estimates that between 88 and 115 million people will suffer extreme poverty due to COVID-19 and the associated economic and social inequality caused will lead many vulnerable people to become victims of modern slavery practices as they seek to survive.<sup>4</sup> Especially vulnerable are women, children, migrants and refugees. Whilst our own supply chains are predominantly Australian in origin we have identified high risk supply chains and are focused on addressing and mitigating any risks of modern slavery within them.

We are committed to reducing the risks of modern slavery in our operations and are developing and implementing policies and processes across our businesses that will enable us to identify, mitigate and act to cease the practice.

With the pandemic far from over, ongoing travel restrictions both domestic and international and an uncertain future state we will continue to focus our attention on helping those who support the communities in which we operate, and this includes continuing to identify ways to eradicate modern slavery from our operations and supply chains and helping to build a sustainable future for people, communities, our customers and our Members.

Rohan

Rohan Lund  
NRMA Group CEO



<sup>4</sup> [blogs.worldbank.org/opendata/updated-estimates-impact-covid-19-global-poverty-looking-back-2020-and-outlook-2021](https://blogs.worldbank.org/opendata/updated-estimates-impact-covid-19-global-poverty-looking-back-2020-and-outlook-2021)  
[globalpolicyjournal.com/blog/09/10/2020/effects-covid-19-migration-and-modern-slavery](https://globalpolicyjournal.com/blog/09/10/2020/effects-covid-19-migration-and-modern-slavery)

# Structure of the NRMA

The NRMA is a member owned organisation structured as an Australian public company limited by guarantee, and operates in the travel, leisure and tourism sectors. The NRMA includes the operational divisions of NRMA Corporate and Membership, NRMA Motoring, and the wholly owned controlled entities of NRMA Marine, NRMA Parks and Resorts and Thrifty. It operates through a number of wholly owned Australian subsidiary companies and one wholly owned New Zealand subsidiary company. The NRMA employs 2,301 full, part-time, fixed term and casual staff.

The NRMA holds a number of investments which it does not control or manage operationally in the form of equity and holdings in other Australian companies and holdings in managed funds and joint ventures.

It is a shareholder of Australian Motoring Services Pty Ltd and Club Assets Pty Ltd which are owned by the various auto clubs of Australia, and deliver services and initiatives on behalf of the clubs on a national basis.

## The NRMA Registered Office

151 Clarence Street  
Sydney NSW 2000

# Our operations


We are one of Australia's largest motoring, travel, tourism and leisure businesses. The services we provide include, roadside assistance services, mobility and commuter services, advocacy, education, electric vehicle charging, tourism and leisure. We have proactively expanded our leisure and tourism footprint through NRMA Parks

and Resorts, NRMA Marine and investment in accommodation and tourism. Our operations are generally based in Australia however Thrifty also operates in New Zealand and utilises one offshore contact centre based in the Philippines for its Australian operations.

## Operational divisions - NRMA

Operational divisions - NRMA	Function and employees
 Corporate and membership	Membership and the corporate areas provide key functions for the group including the Open Road magazine, membership programs, marketing, legal, technology, finance, human resources, property services, procurement, investments, community engagement and involvement with jointly owned motoring organisations including Australian Motoring Services and Club Assets.
NRMA Motoring	Comprises car servicing*, roadside assistance, driver training, education, batteries and electric vehicle charging infrastructure. NRMA Corporate & Membership and NRMA Motoring combined employs 1,138 full, part-time, fixed term and casual employees.

## Controlled Entities

Controlled Entities	Function and employees
 Kingmill Pty Ltd and Motoka Pty Ltd trading as Thrifty Car Rental	Car and truck rental services in Australia and New Zealand. Kingmill Pty Ltd has 34 wholly owned locations within Australia. Motoka Pty Ltd has 15 wholly owned locations within New Zealand. The remaining network locations are franchisee owned. Kingmill employs 377 full, part-time, fixed term and casual employees. Motoka employs 75 full, part-time, fixed term and casual employees.
 NRMA Parks and Resorts	NRMA owns 35 holiday parks across Australia. NRMA Parks and resorts employs 490 full, part-time, fixed term and casual employees.
  NRMA Marine	<b>Commuter services in Sydney.</b> My Fast Ferry employs 123 full, part-time, fixed term and casual employees. <b>Tourism and leisure services in NSW.</b> Fantasea employs 98 full, part-time, fixed term and casual employees.

\*Car servicing services trading as Motorserve was sold on 31 January.



# Impact of COVID-19

## NRMA Corporate & Membership

NRMA Corporate & Membership controls core functions of the NRMA including; technology and data, sales and marketing, finance, risk, compliance, legal, property, human resources, our Australian call centres and Member services, including publication of the Open Road magazine and operation of our Member benefit program NRMA Blue.

## NRMA Motoring

NRMA Motoring provides roadside assistance and other Member services including driver training and education (delivered via a network of franchisees), vehicle battery supply and our electric vehicle fast charging network. We also offered car servicing via our Motorserve network which was sold on 31 January 2020.

### COVID-19 Impact

The impacts of COVID-19 to NRMA Corporate & Membership and NRMA Motoring included, reorganising our employee work practices and temporarily pausing our education and driver training programs. Where possible we implemented working from home practices for many of our people and implemented COVID safe work practices for frontline employees. Our education team explored how to deliver programs through online learning platforms while roadside assistance callouts from essential workers were prioritised with vehicles stationed near or adjacent to hospitals. Many of our frontline were redirected to assist vulnerable community members with deliveries of pharmaceuticals and supporting isolated community members.

## Investments

The NRMA investment activities involve investing in a number of externally managed funds which cover a diverse range of assets as well as direct investments managed by fund managers under discrete mandate. We also hold investments in Australian hotel assets via joint ventures in the historic Hotel Kurrajong in Canberra and the national Travelodge chain, as well as through a holding in a property fund which invests in regional Australian hotels. The operations of these hotels are managed by other parties.

We have also provided venture capital to a number of Australian startups operating across Australia, the UK and the USA and continue to hold minority equity stakes in these companies.

### COVID-19 Impact

The pandemic has impacted our Australian hotel assets through the downturn in business and leisure travel and affected the performance of our investments generally.

## Community

The NRMA partners with The Australian Red Cross to assist young Aboriginal and Torres Strait Islander people obtain their P1 drivers licence. We also partner with Gynea Community Aid and Information Service to deliver the Refugee Learner Driver Mentor (DriveTime) program supporting newly arrived refugees gain their drivers licence. We have commenced a partnership with Tribal Warrior aimed at enabling their trainees to gain work experience in our marine business.

### COVID-19 Impact

Both community learner driver programs were paused during lockdowns, impacting participants. They recommenced as restrictions lifted with revised work practices implemented to maximise participant and employee safety. Our partnership with Tribal Warrior was also affected as a reduction in fleet journeys and pausing of activity during lockdowns did not provide trainees with opportunities to participate in ferry operations.

## Our Controlled Entities

### Thrifty

Through its subsidiaries Kingmill Pty Ltd (Australia) and Motoka Pty Ltd (New Zealand) NRMA provides car and commercial vehicle rental services in Australia and New Zealand under the trading name Thrifty Car Rental. The Thrifty network is a combination of NRMA owned and operated locations and a large franchisee network. The NRMA owned and operated locations are predominantly airport and CBD based.

### COVID-19 Impact

The onset of the pandemic and the associated lockdowns and national and international border closures saw rental vehicle demand drop by 70%. This forced the temporary closure of some locations and a continuing reduction in demand for passenger vehicles at airports. Subsequent lockdowns and ongoing international border closures continue to impact rental demand. Thrifty implemented COVID safe measures across the network to ensure consumer and employee safety and provided vehicles free-of-charge to essential personnel.

### NRMA Marine

NRMA Marine operates the My Fast Ferry and Fantasea businesses through various wholly owned subsidiaries.

### My Fast Ferry

Operates a combination of commuter and tourism services within the Sydney basin.

### COVID-19 Impact

Lockdowns impacted passenger the My Fast Ferry commuter passenger numbers significantly and some services were reduced. All services deemed essential by the NSW government were maintained.

### Fantasea Cruises

Operates tourism and leisure cruises and the Palm Beach ferry service.

### COVID-19 Impact

With national and international border closures and lockdowns the demand for leisure and tourist activities was significantly reduced. Whilst the Palm Beach ferry service was maintained during lockdown due to its classification as an essential service, leisure and tourist cruises were paused. With ongoing international border closures and temporary national lockdowns passenger numbers remain affected.

## NRMA Parks and Resorts

NRMA owns 35 holiday parks in NSW, QLD, VIC and TAS. These parks provide accommodation and leisure services to NRMA Members and the wider public. During the reporting period the NRMA provided park management services to 16 non-owned parks across Australia.

### COVID-19 Impact

Lockdowns dramatically affected our Parks and Resorts business with an estimated 183,000 accommodation nights lost. COVID safe measures were introduced across our properties and we provided accommodation to essential workers and medical teams.

## Non-controlled entities - Participation in Motoring Organisations

The NRMA exercises a significant influence in the following non-controlled entities both of which are owned by various auto clubs in Australia and deliver initiatives and services on behalf of these clubs.

### Australian Motoring Services Pty Ltd

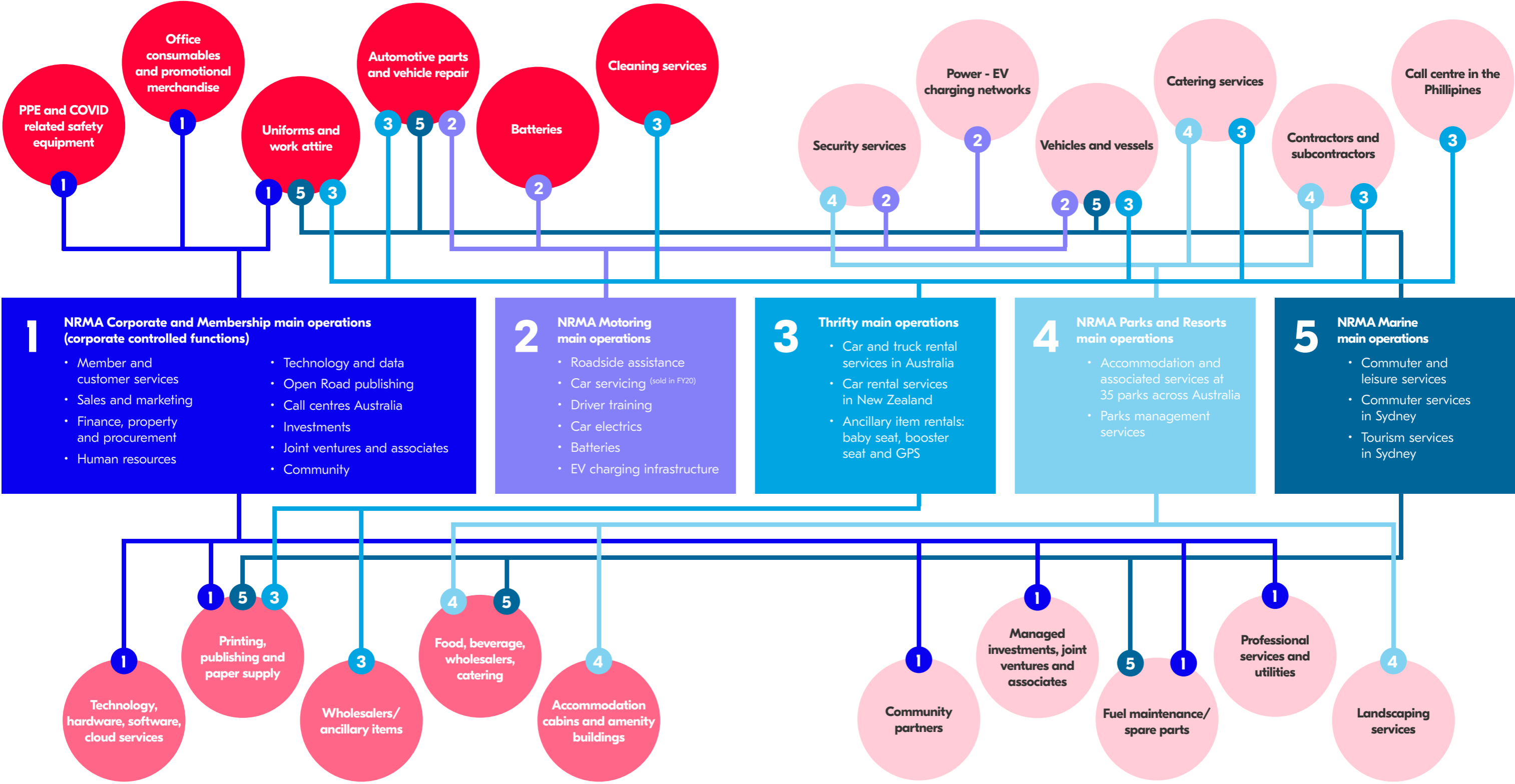
Provides motoring and travel assistance services.

### Club Assets Pty Ltd

Club Assets Pty Ltd through its 75% ownership of Club Assist Corporation Pty Ltd provides motoring assistance services including the supply of batteries.

# Our supply chains

● High perceived risk of modern slavery within supply chain
 ● Medium perceived risk of modern slavery within supply chain
 ● Low perceived risk of modern slavery within supply chain



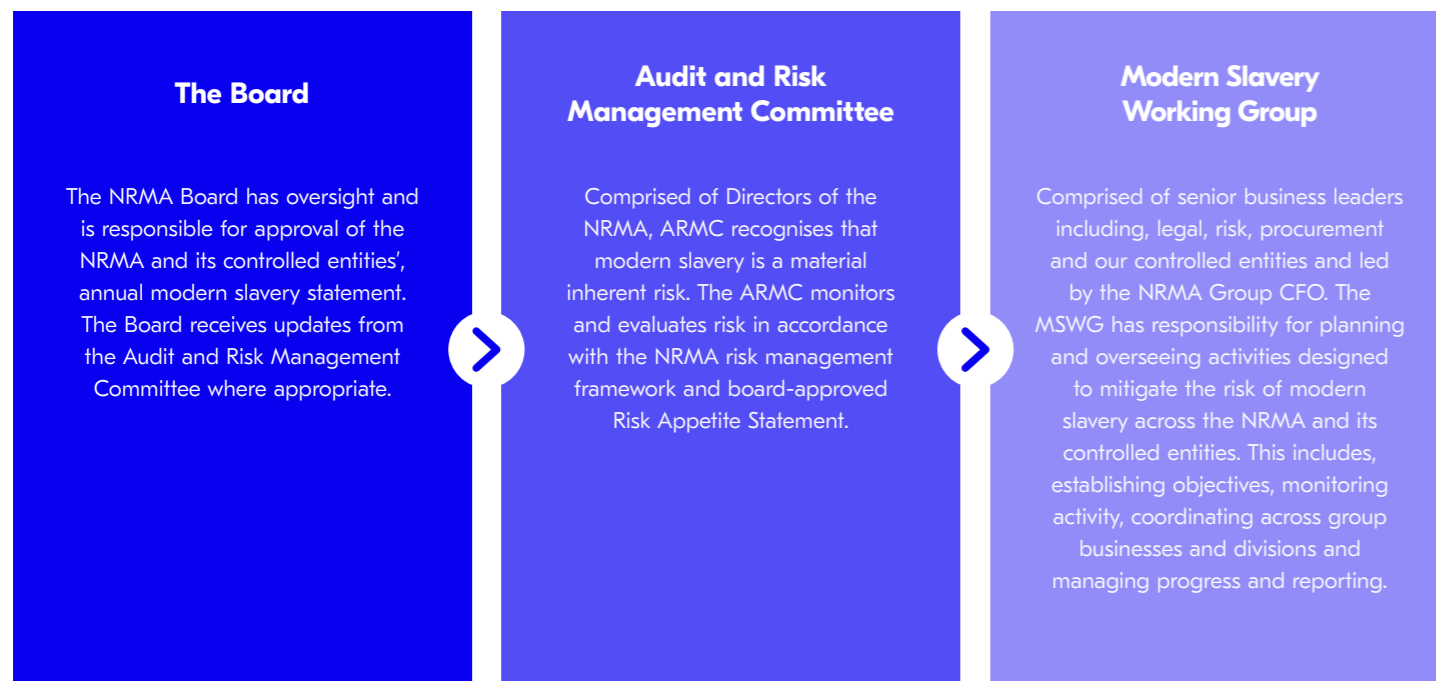
# Assessing the risk of modern slavery in our operations and supply chains

Much of our procurement activity involves the purchase of goods and services from Australian suppliers. However we are aware that the importation of materials and products and some Australian industries carry modern slavery risks.

Modern slavery is classified as an inherent material risk to our organisation and has the potential to affect our operations, brand and reputation. The Modern Slavery Working Group (MSWG) was established to lead and take responsibility for setting objectives, monitoring activities and managing progress across the NRMA to reduce the risk of modern slavery in the our operations and supply chains.

Brand and reputation forms one of our eight key risk categories and falls within our risk management framework which is overseen by our Board and the Audit and Risk Management Committee (ARMC). The NRMA has in place a robust approach to risk management ensuring we can mitigate and minimise potential risks with clear and consistent guard rails communicated in our board-approved NRMA Group Risk Appetite Statement.

The following diagram illustrates the functions of our Board, ARMC and MSWG in relation to addressing modern slavery risks within the NRMA.



# Actions in FY20 taken to assess and address these risks

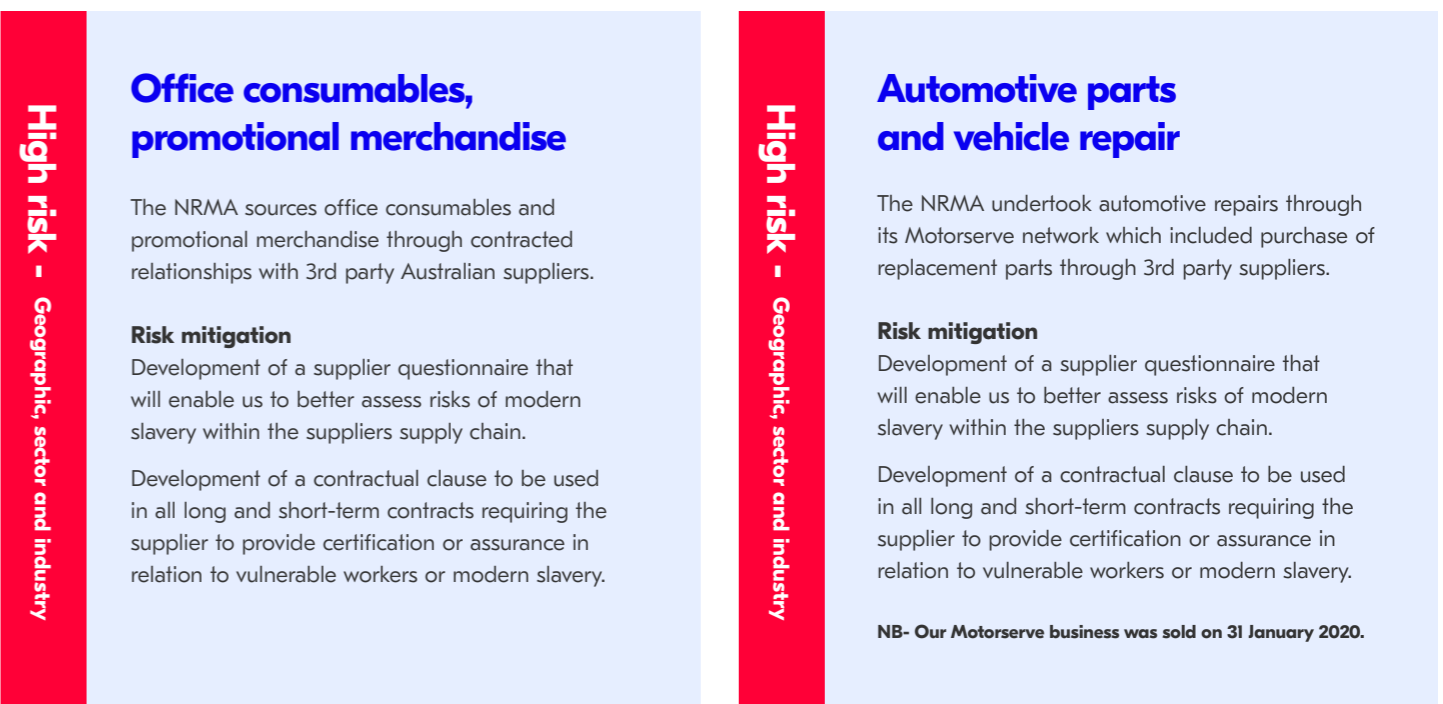
During FY20 we undertook activities designed to build on our commitment to eradicate modern slavery across our operations and supply chains. Due to the need to pivot our businesses to meet the challenges posed by COVID-19, some planned activities will be reprioritised during FY21 as our focus in the period remained on supporting our businesses, employees and Members during the pandemic. During FY20 the following activities were undertaken:

## Embedding oversight and management across the NRMA and its controlled entities

During FY20 we restructured a number of our business functions to meet the challenges posed by COVID-19 and embedded the oversight and management of risks associated with modern slavery into our risk management framework. This included raising the profile of the MSWG across our operations and alerting employees with regard to our new policies, processes, and requirements with regard to modern slavery.

## High risk supply chain identification

During FY20 we undertook a review to identify and classify our supply chains as low, medium or a high risk of modern slavery. We first classified our suppliers into short-term (low value contracts often representing one-off purchases) and long-term (those who are deemed strategic, high value core suppliers who may provide goods and services over multiple years or whom are classified high risk due to their goods or services being used by our Member base). Our top tier long-term suppliers were then reviewed by the MSWG using our risk management framework in combination with available modern slavery data<sup>5</sup> with regard to high risk industry sectors and geography. Based on the outcomes of these assessments we identified six high risk supply chains and put in place risk mitigation procedures as detailed below.



<sup>5</sup> [globalslaveryindex.org](https://www.globallslaveryindex.org)

### Uniforms and work attire

The NRMA sources uniforms for all group businesses through contracted relationships with 3rd party Australian suppliers.

**Risk mitigation**

Development of a supplier questionnaire that will enable us to better assess risks of modern slavery within the suppliers supply chain.

Development of a contractual clause to be used in all long and short-term contracts requiring the supplier to provide certification or assurance in relation to vulnerable workers or modern slavery.

### Cleaning services

The NRMA has in place contracts with Australian companies for the cleaning of office premises. Contracts for the cleaning of frontline group business locations are organised directly by individual locations.

**Risk mitigation**

Development of a supplier questionnaire that will enable us to better assess risks of modern slavery within the suppliers supply chain.

Development of a contractual clause to be used in all long and short-term contracts requiring the supplier to provide certification or assurance in relation to vulnerable workers or modern slavery.

### PPE and COVID related safety equipment

In line with safety risks posed by the global pandemic the NRMA purchased PPE equipment and appropriate cleaning materials for both internal and external operations to keep our employees, Members and customers safe. These items were sourced via existing suppliers.

**Risk mitigation**

Development of a supplier questionnaire that will enable us to better assess risks of modern slavery within the suppliers supply chain.

Development of a contractual clause to be used in all long and short-term contracts requiring the supplier to provide certification or assurance in relation to vulnerable workers or modern slavery.

### Batteries

The NRMA purchase automotive batteries for vehicles.

**Risk mitigation**

All batteries are purchased from Club Assist Corporate Pty Ltd of which NRMA through its partial ownership through Club Assets Pty Ltd exercises significant influence.

Club Assist Corporation Pty Ltd is required to report on modern slavery and has provided NRMA with a copy of their statement. It is a reporting entity and has undertaken an assessment of their supply chains and put in place risk mitigation strategies.

### Development of a Supplier Questionnaire

The MSWG are in the process of developing a supplier questionnaire designed to identify modern slavery risks within organisations that supply goods or services to the NRMA. This will be issued to both existing and potential suppliers and provide us with important data that will enhance our risk assessment. The information provided will also enable us to work with suppliers where risks have been identified to mitigate these perceived risks. This questionnaire will be trialed by the operational divisions of NRMA Corporate & Membership and NRMA Motoring in FY21 and further refined prior to use by the controlled entities.

### Contracts

Our legal team have drafted new clauses for inclusion within all new procurement contracts which will enable us to request certification and assurance from suppliers in relation to vulnerable workers and modern slavery. This will be rolled out in FY21.

### Controlled entities – Creation of centralized working group

During the pandemic we formulated a working group to manage the procurement activities of our controlled entities (NRMA Marine, NRMA Parks and Resorts and Thrifty). Procurement had previously been undertaken by each individual controlled entity. This will assist in providing a more holistic view of our supply chains and allow more stringent controls and reporting. The working group has embarked on a classification exercise similar to that undertaken by NRMA Corporate & Membership and NRMA Motoring, classifying suppliers into low, medium and high risk. On completion, top tier high risk supply chains will be identified whereby we will engage with existing suppliers through our supplier questionnaire and work with them to mitigate identified risks.



## NRMA policy updates

During FY20 we undertook a review of our employee policies and procedures to ensure that our expectations in relation to mitigating the risks of modern slavery were incorporated and well represented across the NRMA. Where necessary, policies and procedures were updated to reflect our commitment to eradicating modern slavery. The following provides an overview of policies reviewed and updated during FY20.

Policies	Purpose: Procurement	Status	Scope
Procurement Tendering & Contract Management Policy	Outlines our expectations with regard to transparency and minimisation of opportunities for fraud, corruption, collusion and conflicts of interest. It requires compliance with our NRMA Supplier Engagement Principles	Completed	Suppliers
NRMA Supplier Engagement Principles	Sets forth our commitment to the Modern Slavery Act 2018 and the Fair Work Act 2009 and sets out our expectations of suppliers and insists on their compliance with the principles contained within and requirements pertaining to monitoring risks and record keeping.	Completed	Suppliers

Policies	Purpose: Operations and Execution of Corporate Strategy (includes investments and acquisition)	Status	Scope
Community & Sustainability Policy	Outlines our commitment to the United Nations Sustainable Development Goals and how these are considered in our strategy and operations.	Completed	All group businesses
Code of Conduct	Our Code of Conduct defines the expectations we have with regard to how our employees behave internally and externally and impels them to take action when behaviours are identified that do not align with these values.	Completed	All group businesses
Speak Up Policy	Provides an externally hosted hotline whereby current, former workers, contractors, suppliers and their employees and associates of NRMA can raise actual or suspected concerns of conduct that is in contravention with our policies without fear of intimidation, disadvantage or detriment. The policy maps out our process of investigation for employee disclosures.	Completed	All group businesses
Risk Management and Organisational Resilience Policy	Embeds and maintains a risk management and organisational resilience approach across all levels of the business to support the delivery of organisational objectives in line with our legislated requirements and pertaining to our organisation's reputation.	Completed	All group businesses

## Embedding our commitment to eradicating modern slavery within the NRMA

We are developing a training and communication program for the NRMA which outlines our commitment to eradicating modern slavery from our supply chains and embeds human rights principles across our organisation.

## Remediation Processes

The NRMA and its controlled entities are still in the early stages of identifying and mitigating risks of modern slavery within our operations and supply chains. We envisage that where we identify risks we will first seek to work directly and openly with suppliers informing them of our principles and expectations and where possible assisting them in meeting these expectations through meetings, training and support. We will actively seek to encourage our suppliers to undertake their own due diligence on their supply chains, manage risks and report incidents to us.

After a supplier completes their due diligence we will review their processes and procedures in regard to compliance with our supplier engagement principles. Where a supplier is unwilling to engage with us in this process we may look to terminate or not renew our contract and source an alternative supplier.

## Measuring the effectiveness of our actions

The MSWG measure the effectiveness of our actions and reports to the ARMC. Procurement teams will introduce programmed meetings with suppliers identified as having a high risk of modern slavery within their business or supply chains to gather accurate data regarding their progress on mitigation processes in FY21.

We will also look to undertake regular supplier reviews including engaging with identified high-risk suppliers to understand their willingness to adopt measures that will meet our requirements. The information gathered will be analysed and reported on with remediation actions put in place if required. We will measure our progress by evaluating the actual measures taken by them against our established risk management framework.

## Consultation with controlled entities

The MSWG is responsible for consultation with our controlled entities. Key stakeholders from these entities are members of the MSWG and represent their entity. They consult with their entity to input into the annual planning of activities, development of strategies and policies, and represent the position and capability of their businesses at all MSWG programmed meetings. During the year they report on progress, modern slavery initiatives and identify any issues that require assistance or input from core NRMA functions, and work with the MSWG to formulate the group Modern Slavery Statement.

