# **Autosports Group Limited**

# **MODERN SLAVERY STATEMENT**

2023

#### 1. Introduction

Autosports Group Limited and its subsidiaries (Autosports Group) opposes slavery in all its forms. This statement applies to all entities owned or controlled by Autosports Group Limited and describes the steps we took in respect of the financial year ending 30 June 2023 to seek to minimise the risk of modern slavery occurring in our business and supply chains. A full list of wholly-owned and controlled entities is found in our Annual Report.

## 2. Our Structure, Operations and Supply Chains

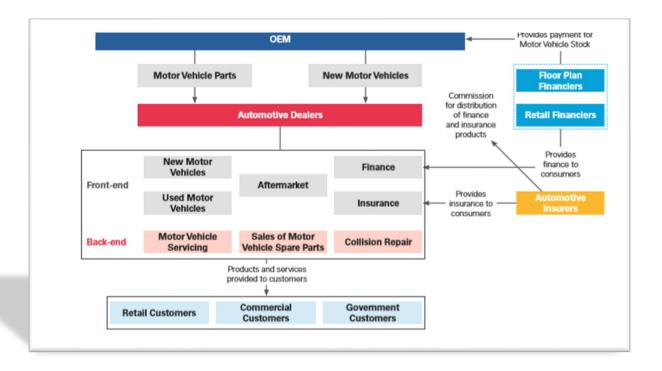
Autosports Group is an Australian business specialising in selling luxury motor vehicles, vehicle servicing and repairs, parts retailing and wholesaling and collision repair.

Autosports Group was established in 2006 and publicly listed on the Australian Securities Exchange (ASX: ASG) in 2016. The Group employs approximately 1800 people across 69 businesses in Australia and New Zealand.

Autosports Group comprises 18 wholly-owned subsidiaries and two partly-owned subsidiaries which are centrally managed from our corporate head office at Autosports Group Head Office 555 Parramatta, Leichhardt New South Wales.

Our supply chains include the following goods and services: vehicles and parts, consumables such as oil, fuel, paint and lubricants, logistics and transport services, car washing and detailing services, sublet, recruitment services, marketing and printing services, cleaning, storage and waste disposal services, professional services, finance products, insurance, property rental and vehicle storage, information technology, telecommunication products and services, coffee, food and beverage, gift hampers and office supplies.

#### 3. Overview of the Australian Automotive Dealership Industry



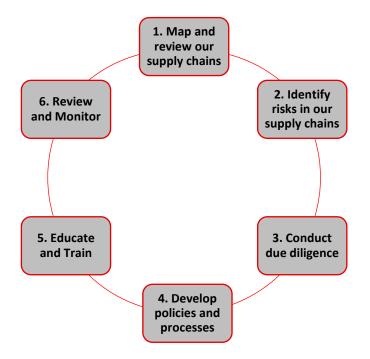
## 4. Our approach to modern slavery

The Board approved a Modern Slavery Plan in respect of the FY23 reporting period to focus the Group's enquiries and engagement with its stakeholders. Management reported to the Audit & Risk Committee throughout the year in relation to the Group's progress with the Modern Slavery Plan. Once again, the Board was responsible for approving modern slavery-related policies, such as this statement.



#### 5. FY23 Modern Slavery Plan

The key steps of our modern slavery plan are set out below.



## 6. Potential risks of modern slavery in our supply chains

The risks of modern slavery practices mean the potential for an entity to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains – in other words the risk that an entity may be involved in modern slavery. Our risk profile indicates that risks of modern slavery are more likely to occur further down the supply chain at Autosports Group.

In FY23 we reviewed our waste management suppliers, most of which are based in Australia. In the provision of waste management services, the risk of modern slavery is recognised as a high risk industry globally. The waste management sector is a target for exploitation by organised crime groups seeking to profit from modern slavery and forced labour practices. The nature of these roles makes them appealing to individuals facing financial difficulties, lacking support and qualifications, and having limited proficiency in English which renders them highly vulnerable to becoming victims of modern slavery. The waste management industry's reliance on temporary labour and its high turnover rates create an environment where traffickers can exploit their victims discreetly and without detection. The demand for workers in these low-skilled positions further exacerbates the risk of exploitation.

Most of our suppliers have conducted their own due diligence and established internal processes to manage and monitor modern slavery risks within their operations and supply chain. Some suppliers are members of Tyre Stewardship Australia (TSA) which is an organisation that conducts regular audits on its members to ensure compliance with anti-slavery standards.

# 7. Case Study – Exclusive engagement with an ethical migration agency

It is understood that in some countries foreign workers seeking employment in Australia face financial burdens to cover the costs associated with obtaining a visa. Some practices involve foreign migration agencies offer high-interest-rate loans, leaving these workers with little financial autonomy while working in Australia.

Recently, Autosports Group entered into an exclusive arrangement with an Australian migration agent that prioritises ethical recruitment principles to avoid exploitative arrangements for workers seeking employment in Australia. Through this partnership, Autosports Group has reduced the likelihood of exploitative practices in this important area.

#### 8. Due Diligence and Remediation

During the reporting period we undertook due diligence enquiries with our waste management suppliers.

We reviewed our supply chain mapping, existing contracts and asked our suppliers in the focus areas to complete a due diligence questionnaire. The questionnaire asked questions about the supplier's awareness and procedures in relation to modern slavery risks.

The responses to the due diligence enquiries did not indicate that our waste management suppliers would have directly caused, contributed to or were linked to modern slavery in the waste management supply chain.

If Autosports Group is dissatisfied with a supplier's response regarding their awareness or the implemented procedures related to modern slavery risk, Management provides information in relation to modern slavery and may collaborate with the supplier to improve awareness. In certain cases, Autosports Group may opt to discontinue procuring the services from that supplier.

Autosports Group provides employees, suppliers and their families with a confidential, independent whistleblowing service accessible 24/7, 365 days which can be used to report suspected cases of modern slavery.

Our remediation guidelines set out how Autosports Group will respond to a suspected case of modern slavery. The guidelines acknowledge that there is no one size fits all approach to remediation as each matter is unique and should be handled in a way that is proportionate to the harm and puts the victim

first. Autosports Group has a Modern Slavery Team responsible for handling complaints or suspected instances of modern slavery.

If instances of modern slavery are identified within Autosports Group's supply chain or operations, the Modern Slavery Team is required to investigate the incident and provide regular reports the Audit & Risk Committee and Board.

#### 9. Our policies and procedures

Autosports Group reviewed its Supplier Code of Conduct which is available on our website and sets the minimum standards expected of our suppliers. Our legal team maintains a suite of contract clauses which can be used when contracting with new suppliers. Our supplier on-boarding questionnaire helps us to assess the risks or issues associated with the supplier prior to contracting with them. The on-boarding questionnaire addresses matters relating to modern slavery, privacy, cybersecurity and environmental matters. Suppliers are asked to comply with the Group's Supplier Code of Conduct. The questionnaire also provides an information sheet on what modern slavery is.

Our employee on-boarding procedures flag potential modern slavery risks through an on-boarding questionnaire. Autosports Group maintains several policies that support the Group's efforts in addressing modern slavery risks. Our Whistleblower Policy, Grievance Policy, Code of Conduct and Communications Policy all address modern slavery risks. These policies are reviewed and approved by the Board periodically.

# 10. Education, consultation, and review

In respect of our FY23 Modern Slavery Plan, we released refresher modern slavery training to existing employees and inducted new employees from recent business acquisitions. The training explained the different forms of modern slavery and relevant examples of how they could occur in the workplace and supply chains. The training helps employees to identify different forms of modern slavery and highlighted the Group's external whistleblowing platform as a mechanism to anonymously report potential instances of modern slavery.

A consultation process with our wholly-owned subsidiary businesses was undertaken to draft this statement. Autosports Group businesses have adopted a risk-based approach to modern slavery due diligence and have primarily focused its modern slavery compliance obligations in regard to its direct employees and tier-one supply chains.

Autosports Group has assessed the effectiveness of its actions in FY23 by reference to the quality of supplier's responses to the due diligence questionnaires, whether potential instances of modern slavery are reported, the outcome of remediation strategies where required, and a review of the Group's practices compared to Government guidelines.

The Board has adopted a Modern Slavery Plan for FY24 which will continue to build on the work done in FY23.

#### 11. Approval

This Modern Slavery Statement was approved by the Autosports Group Limited Board on 21 August 2023 and is signed by the Chairman and the Chief Executive Officer.

James Evans Chairman Nicholas Pagent