

Apollo Tourism & Leisure Ltd Modern Slavery and Human Trafficking Statement

This statement is made pursuant to the Australian *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW) (**Modern Slavery Laws**). It describes the steps taken by Apollo Tourism & Leisure Ltd (**Apollo**) to minimise modern slavery and human trafficking risks within its supply chain and in the operations of its business during the financial year ending 30 June 2020.

About us

Established in 1985, Apollo is a leading Australian tourism leisure company with operations in Australia, New Zealand, North America, Germany, the United Kingdom and Ireland. Since our humble beginnings as a small family business, Apollo has grown into a multi-national company focused on manufacturing, rental, sales and distribution of a range of RVs including motorhomes, campervans and caravans.

Apollo has manufacturing operations in Brisbane where it produces and assembles RVs for its own rental fleet as well as for the retail market. Apollo manufactures Talvor, Coromal, Windsor and Winnebago branded RVs and has exclusive rights to import Adria products in Australia and New Zealand. Apollo purchases its fleet in North America from Winnebago, Forest River, Pleasure-way Industries and Northern Lite Campers. Apollo's European fleet is purchased from German manufacturer Weinsberg.

Apollo's rental fleet offering is comprised of different types, sizes and brands of RVs, targeting specific segments of the RV rental market.

Apollo sells both new and ex-rental RVs through its own retail dealerships in Australia. In New Zealand and North America, Apollo sells ex-rental RVs through a network of selected dealers.

Apollo's rental and manufacturing operations rely on, and are supported by, various local and multinational supply chains. This includes, but is not limited to, supply chains relating to automotive products and spare parts, linen and textiles and cleaning services.

Commitment to Combatting Modern Slavery

At Apollo, we are committed to conducting business in a responsible and ethical manner and are strongly opposed to any form of modern slavery, such as slavery, servitude, forced labour, human trafficking, or slavery-like practices.

We acknowledge our role in safeguarding human rights through ethical business practices and are committed to implementing and enforcing effective systems and controls to ensure that risks of modern slavery are minimised within our business and our supply chains.

Our approach to modern slavery is enshrined in our Modern Slavery Policy. This Policy underpins our commitment to limit the risk of modern slavery within our business and supply chains. The Policy also serves to ensure our compliance with applicable laws and regulations.

Potential Modern Slavery Risks

We recognise the potential for modern slavery to occur within global supply chains, regardless of geographical location. Where we identify any actual or potential risks as part of our operations or supply

chain, we acknowledge our responsibility to take steps to address those risks through our own activities and business relationships.

Apollo identified a number of key potential modern slavery risks and has engaged with key suppliers to ensure that practices are in place to minimise these risks across the business. We assessed these potential risks by undertaking a modern slavery risk assessment of our key suppliers. This risk assessment involved asking our suppliers to provide details of their approach to modern slavery, including any policies in place relating to modern slavery. In particular, the automotive products and spare parts, cleaning services, linen and textiles supply chains were recognised as potential risk areas for the business.

The automotive supply chain is complex and there are often six to ten levels of suppliers between an automaker and the original source of the raw materials used in automotive products and spare parts. Raw materials commonly used in the automotive industry such as cobalt (used in electronics) and rubber (used for tyres and seals) are commonly sourced from “high risk” countries.

While Apollo procures automotive products and spare parts from reputable national and international suppliers, many suppliers do not obtain the raw materials used in their products and spare parts from the original source of the raw materials. There are multiple tiers of suppliers between Apollo and the original source. Ultimately, the limited traceability within the automotive supply chain means that Apollo is reliant on relationships formed with distributors to identify substandard ethical practices.

Apollo relies on cleaning services to maintain its rental vehicles. Generally, these types of cleaning services are performed by contractors. Contracted cleaning services face a high risk of modern slavery due to a combination of high staff turnover, reliance on migrant workers and low profit margins. Apollo was able to verify that its cleaning suppliers have appropriate policies and controls in place to adequately prevent modern slavery in their supply chains.

Apollo offers linen for hire in its rental vans and supplies uniforms to its staff. Whilst no modern slavery risks were identified in Apollo’s risk assessment and review of its linen and uniform suppliers, certain international suppliers of linen rely on forced labour and raw cotton material sourced from high-risk countries, which places linen at a higher risk of being impacted by modern slavery. The textile industry, which produces clothes used for uniforms, also has a high risk of modern slavery in its international supply chains. Apollo is satisfied that its linen and uniform suppliers have appropriate controls and policies in place to prevent potential modern slavery risks.

Apollo’s modern slavery risk assessment, which included obtaining Modern Slavery questionnaires and copies of relevant policies, confirmed that many of its suppliers already have formal policies and procedures in place to prevent modern slavery related risks in their supply chains. Other suppliers, which do not have formal processes in place, were confident that potential modern slavery risks in their businesses would be identified and dealt with appropriately through informal processes. A number of suppliers confirmed that, prior to the onset of the COVID-19 pandemic, their employees regularly visited entities that made up part of their international supply chains to perform audits and discuss supply chain policies. This practice is expected to continue when international travel resumes.

Assessing Effectiveness

We understand the importance of assessing the effectiveness of the actions we are taking to assess and address modern slavery risks. As noted above, Apollo has a Modern Slavery Policy in place and encourages openness and reporting of any breaches or potential breaches of the policy. In the event a supplier identifies any occurrence of, or a material risk of, modern slavery in their supply chain or operations, the supplier must notify Apollo and take practical and effective steps to address that occurrence or risk.

Apollo will undertake a modern slavery risk assessment on an annual basis, and in addition to ongoing reporting of potential or actual risks, will assess the effectiveness of actions it has taken in controlling or addressing modern slavery risks through this assessment process. We will continue to monitor the effectiveness of our actions by:

- reviewing any reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified;
- engaging with stakeholders to maintain a proactive dialogue regarding modern slavery risks; and
- reviewing completed due diligence questionnaires to confirm the accuracy of information provided by our key suppliers.

Our focus in 2020 was to review our existing processes and procedures. We also strengthened our understanding of the potential modern slavery risks and impacts related to our activities and further upstream in our supply chains. Our planned activities in 2021 include:

- strengthening our due diligence assessment of our identified “high risk” areas, particularly the automotive products and spare parts supply chain;
- reviewing and updating (where necessary) our suite of procurement documents to further embed management of modern slavery aspects in our terms and conditions; and
- exploring the implementation of key performance indicators to track our progress and effectiveness in relation to addressing modern slavery risks.

This statement has been approved by the Board of Directors by resolution passed on 18 December 2020.

Tennille Carrier

Company Secretary

Apollo Tourism & Leisure Ltd