

Rex Gorell Family Group

MODERN DAY SLAVERY STATEMENT

Modern Slavery Statement for Rex Gorell Family Group and associate companies for financial year ending 30 June 2021.

Associate Companies:

- Rex Gorell Family Group Pty Ltd
- Rex Gorell Pty Ltd
- Rex Gorell Motors Pty Ltd
- Rex Gorell Ford Pty Ltd
- RPBJ Gorell Pty Ltd
- RPBJ Pty Ltd

The Rex Gorell Family Group opposes modern slavery in all forms. We are committed to the highest standards of ethical behaviour in our business activities and to promoting a culture of honesty, corporate compliance, and good corporate governance. This statement is made in accordance with the Australian Modern Slavery Act 2018

THE REPORTING ENTITY

The Rex Gorell Family Group is a privately owned group of companies located in Geelong Victoria since 1981. Registered office is 481 Latrobe Terrace Geelong.

This Modern slavery statement describes the steps The Rex Gorell Family Group has taken during the Financial year ending 30 June 2021 to minimize the risks of modern slavery occurring in our business and supply chains

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our Operations

The Rex Gorell Family Group is composed of seventeen Car Dealerships in various locations in Geelong, Victoria. We are a business that retails cars, supplies spare parts and services cars. Our major suppliers are vehicle Manufacturers, including, Ford, Landrover, Volvo, Jaguar, Nissan, Honda, Audi, Renault, Volkswagen, Subaru, Skoda, Peugeot, Citroen, Isuzu, MG, Jeep, BMW and Mini.

Our Supply Chain

Our major supply chains of motor vehicles and parts are from international automotive manufacturers who source product from all over the world

We also identify the following services within our supply chain

- Cleaning Services
- Supply of Non Genuine Parts and Tyres
- Office and Print Supplies
- Advertising Services
- Provision of finance related to the sale of motor vehicles

These non-manufacturer suppliers comprise a very small proportion of our supply chain, but we consider them to have potential breaches of the modern slavery obligations.

IDENTIFYING THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

The first tier of Rex Gorell Family Group supply chain are the Vehicle manufacturers. By far our largest suppliers. We acknowledge that the risks of modern slavery within this group could exist because their geographical locations. We acknowledge that we lack visibility in overseas markets and this carries additional risks of modern slavery especially in secondary levels of suppliers to the international vehicle manufacturers.

Whilst we have little control over these suppliers we continually review the statements from these manufacturing suppliers and the steps they are taking in relation to modern slavery

We have more control over our second tier suppliers as we have close contact with them. We analysed this group of suppliers and consider them low risk. We will continue to gather, collate, and take action where necessary based on information provided by these suppliers in our Supplier Questionnaire to identify risks of modern slavery.

Our third tier of suppliers are our employees. Every employee is paid at least the minimum award wage. They receive regular wage reviews. We have antidiscrimination policies and a zero tolerance to any work place bullying. We believe there is no risk of modern slavery with our employees.

ACTIONS TAKEN BY REX GORELL FAMILY GROUP TO ASSES AND ADDRESS THE RISKS OF MODERN CLAVERY INOUR SUPPLY CHAIN AND OPERATIONS

Rex Gorell Family Group has a zero-tolerance approach to modern slavery both within the Group and within its Companies it does business.

Our code of conduct states that Rex Gorell Family Group respects fundamental human rights and is committed to the principals set out in the Commonwealth Modern Slavery Act 2018. We support and respect the protection of human rights within our area of influence and the effective elimination of compulsory labour and child labour. The code of conduct governs all our business dealings and the conduct of all persons or organisation's with whom we have business relationships. The code of conduct applies to all Rex Gorell Family Group operations and employees. All employees have an obligation to familiarize themselves with our procedures to help identification and prevention of modern slavery. Adherence to this policy forms part of all employee obligations under their contract of employment.

Assessing risk

Rex Gorell Family Group has conducted an assessment to identify higher level risks in our supply chain. The risk factors that were considered included.

- The nature of supplier operations
- The geographic location of suppliers
- The locations the suppliers' source goods
- The services provided to the Rex Gorell Family Group

- The potential nature and location of their workforce, and
- The nature of goods provided to Rex Gorell Family Group

This analysis resulted in the development of a Risk Assessment Framework which outlined our risk assessment and due diligence plan to address modern slavery. This process is ongoing and as we engage our suppliers we will continue to develop a deeper understanding of our supply chain and improve our ongoing Risk Assessment Framework.

Supplier Consultation Process

As part of Rex Gorell Family Group due diligence process we have established a supplier consultation process incorporating a questionnaire seeking information regarding suppliers' supply chains and work practices.

We have engaged with our overseas manufacturers and local suppliers. Our engagement is part of our ongoing efforts to gain further information about our suppliers and forms part of our annual due diligence. Many of our suppliers have ethical procurement policies or they are in the process of developing them.

Addressing Risk – Our Policies and Training

Rex Gorell Family Group commitment to addressing risks of modern slavery is organization wide and is being ingrained in our policies, Procedures and training programs.

To strengthen our modern slavery governance, we regularly review our existing suppliers by

- 1 We have mapped the supply chains to access particular products, services or geographical risks of modern slavery.
- 2 Creating a risk profile for non-manufacturer suppliers
- 3 Monitoring the modern slavery statements issued by each supplier on a regular basis, and evaluating the modern slavery and human trafficking risks.

Whilst recognizing our statutory obligation to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the code of conduct as individuals and organization's within our supply chains.

Rex Gorell Family Group expect the equivalent standards of conduct from all persons acting on its behalf, such as suppliers and franchise partners.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all those we have business dealings.

The Rex Gorell Family Group **Whistleblower Policy** sets a process for our Rex Gorell Family Group representatives to raise concerns about improper conduct. We encourage all its employees, workers, contractors, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. The whistleblowing procedure is designed to be easy for individuals to make disclosures in confidence and without fear of retaliation. The Company also encourages members of the public or people not employed by us to write, in confidence to the Managing Director or the Human Resources Director via our registered head office to raise any concern, issue or suspicion of modern slavery in any part of our business or supply chain.

Our Training and Capacity Building

All Rex Gorell Family Group employees have been provided information regarding the nature and risks of modern slavery and the work that is required by Rex Gorell Family Group in order to ensure we adequately addressing these risks. Each employee has signed a contract that they will adhere to Rex Gorell Family Group policy on modern slavery. Our Workplace bullying and Modern Day Anti-Slavery policies are also displayed in each department of the Rex Gorell Family Group. Both these policies interlock employee rights and protection.

Relevant Policies

The following policies are integral to our continued dedication to identify modern slavery risks and prevent slavery and human trafficking in its operations:

Employee Safeguards

All employees are paid under either the Vehicle Repair, Services and Retail Award 2020 or the Clerks Private Sector Award 2020. We also comply with Occupational Health and Safety Act 2004 to ensure employee safety

Employee Code of Conduct

Our code clarifies the principles, actions and behaviors expected of our employees, workers and contractors when they represent the Company. This code is reviewed periodically and all updates are communicated to our employees and workers as they happen.

Supplier Code of Conduct

Suppliers are required to demonstrate that they uphold the Company's values of integrity, transparency, teamwork and professionalism and specifically that they provide safe working conditions and act ethically and within the law in their use of labour.

Safeguards

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising concern. The company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process far less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Rex Gorell Family Group is committed to ensuring the actions we are taking to identify and mitigate the risks of modern slavery are effective. We have an open dialogue with many of suppliers who have indicated they have their own modern slavery policies and processes. Others, following a request to meet our supplier minimum standards, have committed to implement their own ethical sourcing procedures.

We are also committed to ensuring our staff are trained to report instances and concerns of modern slavery.

STEPS FOR THE PREVENTION OF MODERN SLAVERY

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Commonwealth Modern Slavery Act 2018. We expect the same high standards from all of our contractors, suppliers and other business partners.

All employees have an obligation to familiarize themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employee obligations under their contract of employment.

Whilst recognizing our statutory obligation to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the code of conduct of individuals and organizations within our supply chains. However, we communicate with our suppliers in such a way as to convey to them our Anti-Slavery and Human Trafficking Policy and to gain and understanding of the measures they have taken to ensure modern slavery is not occurring in their businesses.

RESPONSIBILITY FOR THE POLICY

Ultimate responsibility for the prevention of modern slavery rests with the Rex Gorell Family Group leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery

APPROVAL


In order to prepare this joint statement we engaged with each reporting entity covered by this statement and consulted the entities we own. The consultation was made easier with each entity having the same directors.

This Statement was approved by the boards of each of the six reporting entities covered by this statement. The boards of Rex Gorell Family Group Pty Ltd, Rex Gorell Pty Ltd, Rex Gorell Motors Pty Ltd, Rex Gorell Ford Pty Ltd, RPBJ Gorell Pty Ltd and RPBJ Pty Ltd approved this statement on 22 December 2021.


Signed by:

Rex Gorell 
Managing Director Rex Gorell Family Group Pty Ltd
22 December 2021


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