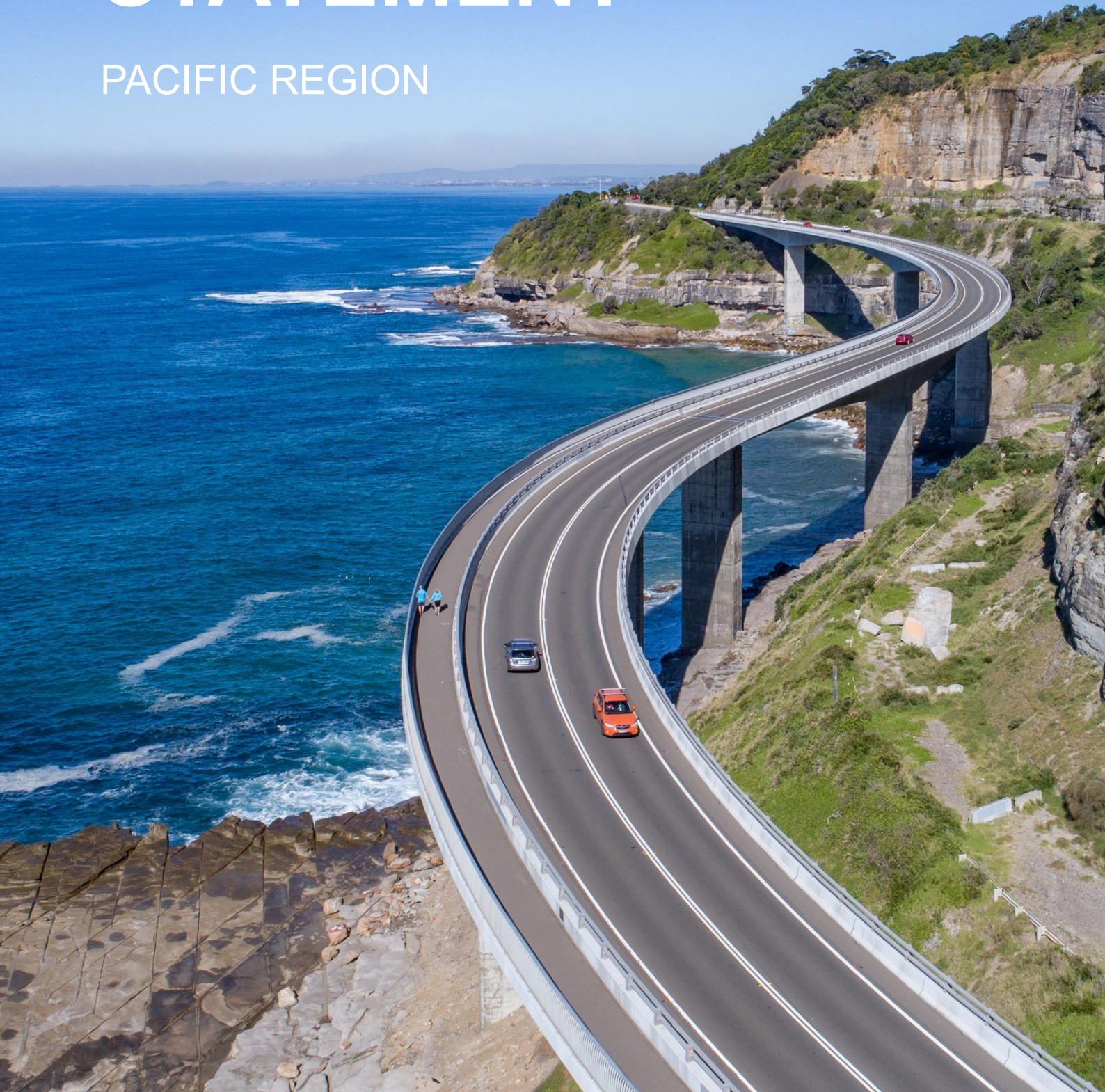


# MODERN SLAVERY STATEMENT

PACIFIC REGION





# 1. Introduction

Modern slavery, a grave violation of human rights, continues to persist globally, including within the borders of Australia and New Zealand. Despite the nations' advanced economy and legal framework, numerous cases of exploitation, forced labour, human trafficking and other forms of modern slavery have been reported.

In Australia, the Commonwealth *Modern Slavery Act 2018 (the Act)* establishes a reporting requirement for large entities, such as the Avis Budget Group, to publish an annual Modern Slavery Statement describing their actions to assess and address modern slavery risks. The reporting requirement applies to entities with annual consolidated revenue of at least AU\$100 million. This statement aims to meet the Avis Budget Group's Modern Slavery reporting requirements and therefore reports on the risks of modern slavery in Avis Budget Group's operations and supply chains, and also on the actions taken to address those risks during Avis Budget Group's financial year ended 31 December 2023.

## Avis Budget Group – Pacific

The ultimate parent company for all entities in the Avis Budget Group – Pacific is **Avis Budget Group, Inc.** which is listed on NASDAQ, New York. **Avis Budget Group Inc** also independently reports its economic, social and environmental performance annually in accordance with the Global Reporting Initiative (**GRI**) Standard as well as the Sustainable Accounting Standards Board (**SASB**) Standards.

This statement covers the Avis Budget Group entities set out in section 2 below of this statement.

Avis Budget Group is committed to working with its supply chain partners to ensure its business operates lawfully and ethically. We expect our suppliers and business partners to commit to ethical standards of conduct in daily business, including by ensuring that workers are paid fair wages, treated with dignity, and provided with a safe working environment.

Further information on the Avis Budget Group's global business, strategy, offerings and approach to sustainability is available at [www.avisbudgetgroup.com](http://www.avisbudgetgroup.com).

## 2. Organisation, Operations and Supply Chains

The Avis Budget Group is a frontrunner in mobility solutions such as passenger and commercial vehicle hire as well as car sharing worldwide.



**\$12 Billion  
Annual  
Revenue Worldwide**



**200,000  
Connected  
Cars**



**691,500 Vehicles  
39 Million Vehicles  
Rented Worldwide**



**10,250 Rental Locations  
in 180 Countries  
Around the World**

In Pacific, Avis Budget Group is headquartered in Sydney, Australia and operates through three separate brands and associated entities in Australia, New Zealand and Singapore:



In the Pacific, the Avis Budget Group employs over 1600 people and operates out of more than 180 locations comprised of agency operators, franchises and our own premises, across the main brands of Avis, Budget and Apex.

### Our Organisation

This statement is a joint statement made by:

#### Australia

1. Avis Management Pty Ltd (ABN 50 001 889 336);
2. W. T. H. Pty Ltd (ABN 15 000 165 855);
3. Budget Rent A Car Australia Pty Ltd (ABN 89 007 348 021);
4. Budget Rent A Car Operations Pty Ltd (ABN 55 054 583 925)
5. Apex Car Rentals Pty Ltd (ABN 65 159 894 970)
6. W. T. H. (Sub 1) Pty Ltd (ABN 86 070 810 703)
7. AB Funding Pty Ltd (ABN 95 125 104 654);
8. AU Holdco Pty Limited (Australia) (ABN 57 159 895 744).

#### New Zealand

9. Avis Rent A Car Limited (New Zealand) (NZBN 9429040195810);
10. W. T. H. (Sub 2) Pty Ltd (NZBN 1172297);
11. Budget Rent A Car Limited (New Zealand) (NZBN 9429039997920);
12. Apex Car Rentals (New Zealand) (NZBN 9429030667440); and

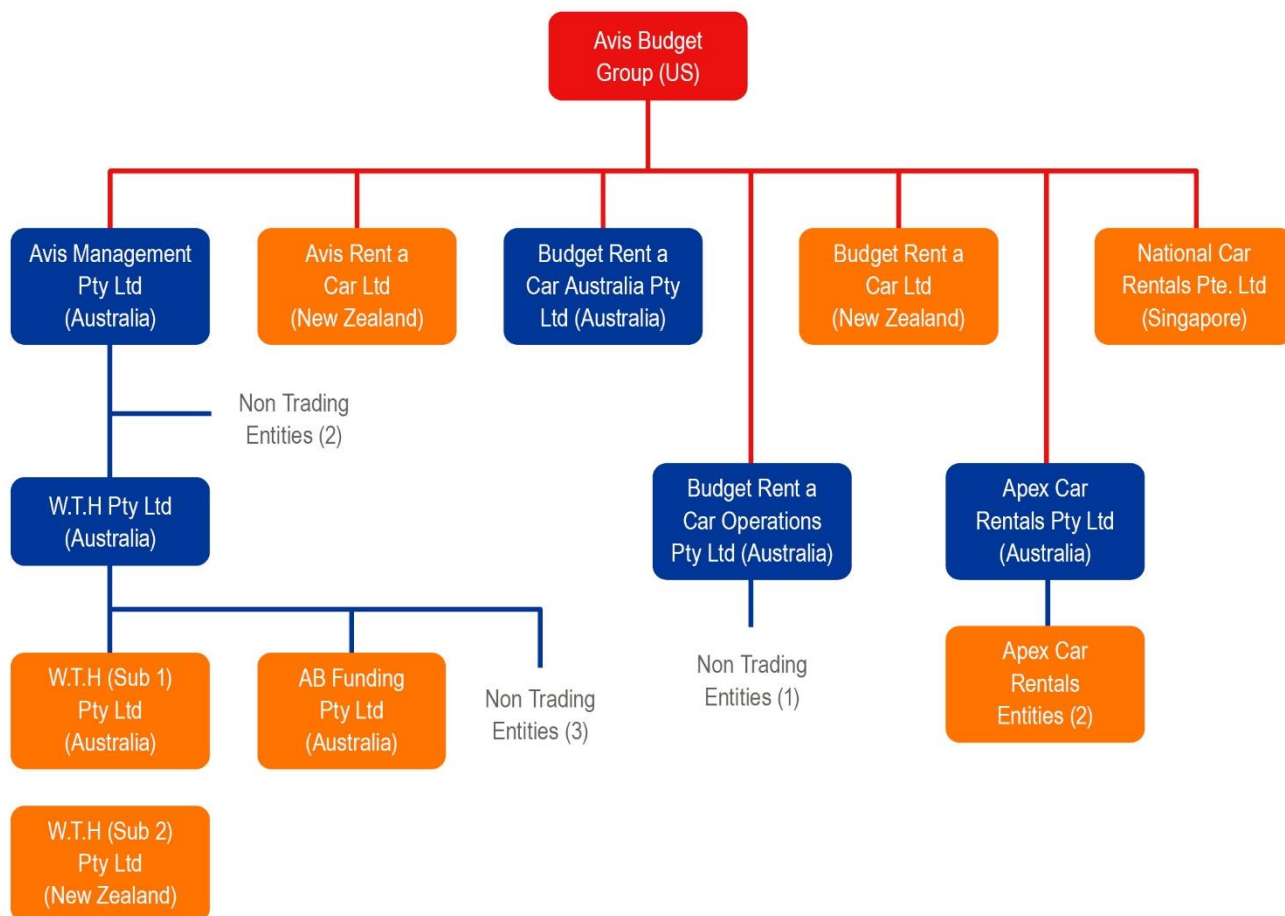
#### Singapore

13. National Car Rentals (Private) Ltd (Company number: 196100157E)

**(Avis Budget Group)**

In preparing this statement we have acted collaboratively and in consultation with wholly owned subsidiaries of the Avis Budget Group (US) in the Pacific. As the entities within the Avis Budget Group in the Pacific use similar policies and processes, operate in the same sector with many shared suppliers and have centralised reporting lines, we will provide a consolidated description of the actions our Group are taking to address modern slavery risks.

## Organisational Structure Chart



<span style="color: red;">█</span>	Covered by Global Modern Slavery Statement	<span style="color: orange;">█</span>	Entities covered by the joint statement under Modern Slavery Act 2018 (Cth)	<span style="color: blue;">█</span>	Entities making a joint statement under Modern Slavery Act 2018 (Cth)
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## Our Suppliers

Suppliers are valuable partners for Avis Budget Group. Avis Budget Group works closely with its suppliers to ensure a socially, environmentally, and economically responsible value chain.

Avis Budget Group purchases various goods and services and has a supply base of more than 5,000 direct suppliers in the Pacific. Excluding vehicles, our total spend in the Pacific was approximately AU\$200m. In the Pacific, about 50% of our spend in 2023 was purchased from less than 50 suppliers.

Suppliers include Fleet related vendors (vehicle and parts manufacturers, vehicle repairs), IT related vendors (telecom/technology) and non-Fleet vendors (Professional Services, Uniforms, Fuels, Call Centre, and various other categories). Avis Budget Group acknowledges that many suppliers themselves rely on their own supply chain.

## Our Franchisees

Besides its suppliers, the Avis Budget Group relies on a network of Franchisees to complement its own network of corporate-owned locations. Whilst there are sourcing activities that covers the Franchisee network, Franchisees are mostly self-reliant in sourcing their needs for Goods & Services. The Avis Budget Group requires all Franchisees to ensure they operate within the framework of, and in accordance with, the Avis Budget Group policies.

The Avis Budget Group has an extensive contractual framework and due diligence systems in place to monitor and audit Franchisees' compliance with Avis Budget Group policies, including appropriate policies relating to modern slavery. One such process is a contractual obligation for directors of franchisees to provide the Avis Budget Group with a signed Modern Slavery Compliance Statement on an annual basis.

The Avis Budget Group is committed to supporting local economic development where we operate, through local sourcing where feasible, as well as training and recruitment of local people.



## Risks Of Modern Slavery Practices in Our Operations and Supply Chain

The Avis Budget Group work to proactively identify potential modern slavery and broader human rights risk areas across our operations and supply chains.

We recognise that the level of modern slavery risk in our operations and supply chains is influenced by a range of factors, including geographic, sector and product specific factors, and we incorporate these considerations into our risk assessment processes. We also understand that our modern slavery risk profile is continually evolving, as we constantly alter our Network, Operations, and Supply Chain.

### Potential Modern Slavery Risks in Our Operations

The risk that, without appropriate due diligence, contractual framework and monitoring processes, we may be directly linked or contribute to modern slavery involving our indirect workforce include:

## Labour Hire

While we have assessed the risk of modern slavery involving our direct employees as low, we recognise contingent workers, such as those provided by third party labour hire may be more vulnerable to modern slavery, including where these workers are lower-skilled and/or temporary or migrant workers. This may include workers in areas such as on-premises cleaning, car relocation and detailing.

Specific and dedicated due diligence and contractual framework were defined for Labour suppliers. The Avis Budget Group is continuing the review of its existing labour providers and the implementation of specific contractual framework, including an obligation for directors of all labour hire suppliers to provide the Avis Budget Group with a signed Modern Slavery Compliance Statement on an annual basis.

## Outsourced Call Centres

The Avis Budget Group maintains Call Centres in several countries both in-house and outsourced, including outside of Australia and New Zealand. This has been identified as carrying medium to high risk of modern slavery due to the locations of the supply chains.

The outsourcing partner used by the Avis Budget Group is a reputable American organisation committed to fighting Modern Slavery practices.

Our partner's call centre operations are annually assessed under a labour certification programme conducted by the local country's Department of Labour and Employment. The certification process includes and assessment of the General Labor Standards Compliance Indicators (i.e. wages, allowances, benefits, hours of work and other workplace entitlements) and Occupational Safety and Health Standards & Compliance Indicators.

Our partner is also in partnership with the Department of Labour and Employment in helping school-leavers transitioning into the workforce with many young persons (18 years and older) finding their first jobs at our call centres. This partnership is evidence of the Department's (and our) faith and trust in our partner's workplace practices, policies and procedures.

The Avis Budget Group also ensures regular visits to the call centre by dedicated personnel and engaged with its partner to understand their internal check and balances relating to Modern Slavery prevention, human right protections and anti-bribery practices.

Finally, we have extensive modern slavery and anti-bribery provisions in our supplier agreement with our call centre partner.

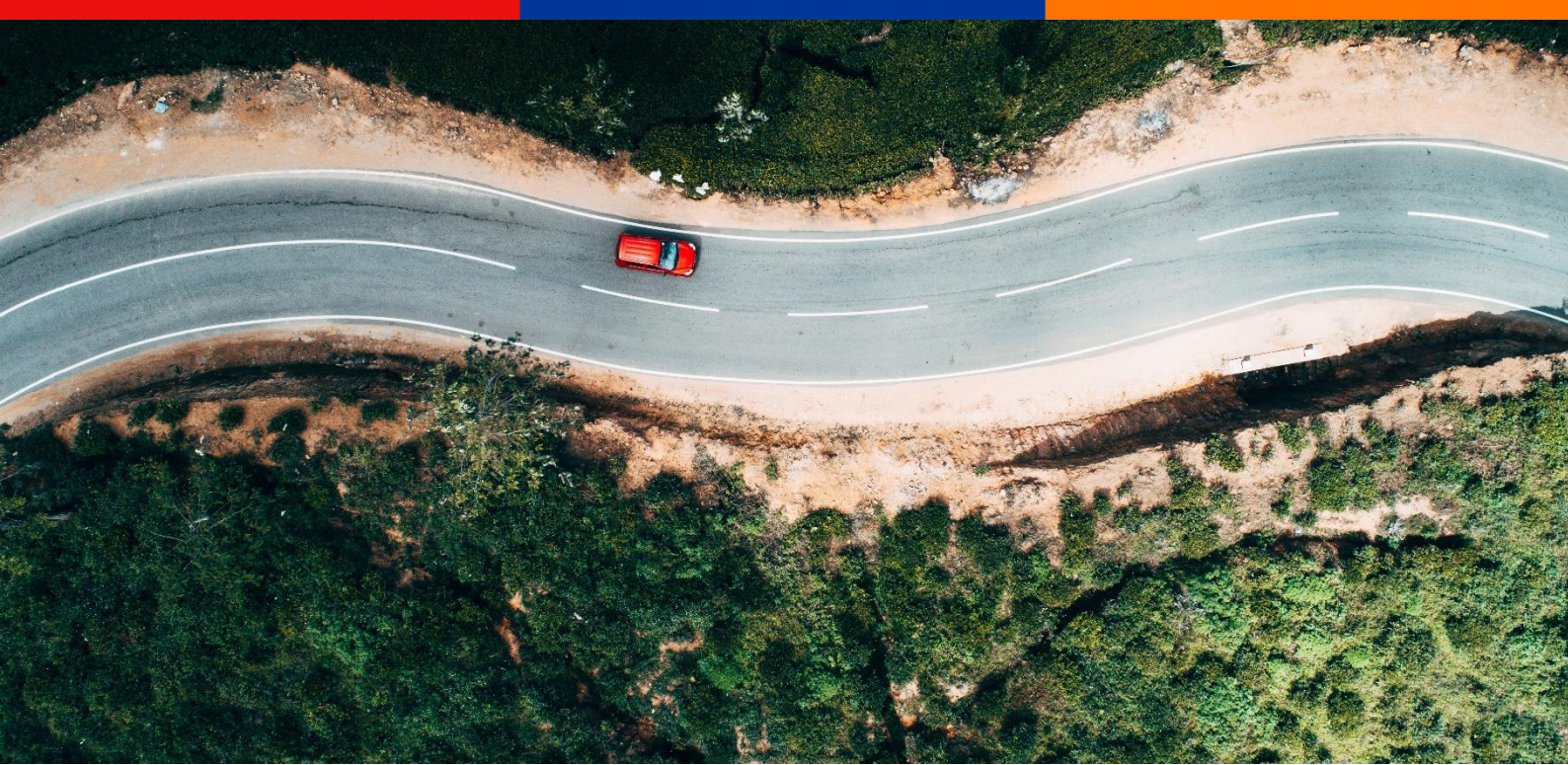
## Cleaners and Detailers

The Avis Budget Group uses third-party labourers (outsource) for vehicle cleaning and detailing services in a limited number of locations; mostly where demand for such labour is seasonal or where supply is difficult to maintain over an extended period of time. Using labour hire for these roles provides continuity and flexibility.

This year, the Avis Budget Group conducted an audit of all our labour hire partners in major locations including Newcastle, Sydney, Brisbane and Melbourne. The audit included anonymous interviews with the workers on topics that included employment benefits, employment documentation, working conditions, recruitment practices, immigration requirements, training and workplace policies (such as bullying, harassment, coercion, intimidation and discrimination).

The audit did not discover any systemic non-compliance or other irregular conduct and therefore, the Avis Budget Group is satisfied with the outcome of the audit and intends to improve on the practice in years to follow.

Finally, we have extensive modern slavery and anti-bribery provisions in our supplier agreement with our Cleaner and Detailer labour hire partners.



## Potential Modern Slavery Risks in Our Supply Chain

The risk that, without appropriate due diligence, contractual framework and monitoring processes, we may be directly linked or contribute to modern slavery involving our supply chain include:

### Uniforms

The Avis Budget Group has, in previous years, implemented a single source of supply for staff uniforms. This provided us with the opportunity to partner with an organisation that is committed to Ethical behaviours and to fighting Modern Slavery. In addition to specific Policies in place, our partner works exclusively with suppliers that can demonstrate adherence to Ethical Standards through a certification such as SMETA. This requirement is extended to their Tier 3 suppliers with a view to go to Tier 4 suppliers in the near future.

As part of our on-going contractual governance, our provider confirmed that the requirement was enforced and provided a mapping of its Supply Chain along with the related SEDEX information.

### Child Restraint

Similar to Uniforms, the Avis Budget Group has centralised the procurement of Child Restraint for its Australian and New Zealand operations. The child restraints are manufactured in Asia and factories used are SEDEX 4-pillars certified with annual audits in place.

## Modern Slavery Risks and Labour Rights Issues Related to Our Employees

We consider our direct workforce to be at negligible risk of modern slavery, thanks to our existing processes and controls. As a Group, adherence with employment law and regulations forms part of our DNA and we have no tolerance for non-compliance.

Our employees are directly engaged pursuant to employment agreements, made under the provisions of Australian or relevant employment legislation and are supported by a robust policy framework which aims to ensure a safe, healthy and fair working environment. We also recognise the rights of our employees to freedom of association and collective bargaining, with or without third party involvement.

Details of our policies can be found in section 4 of this statement.

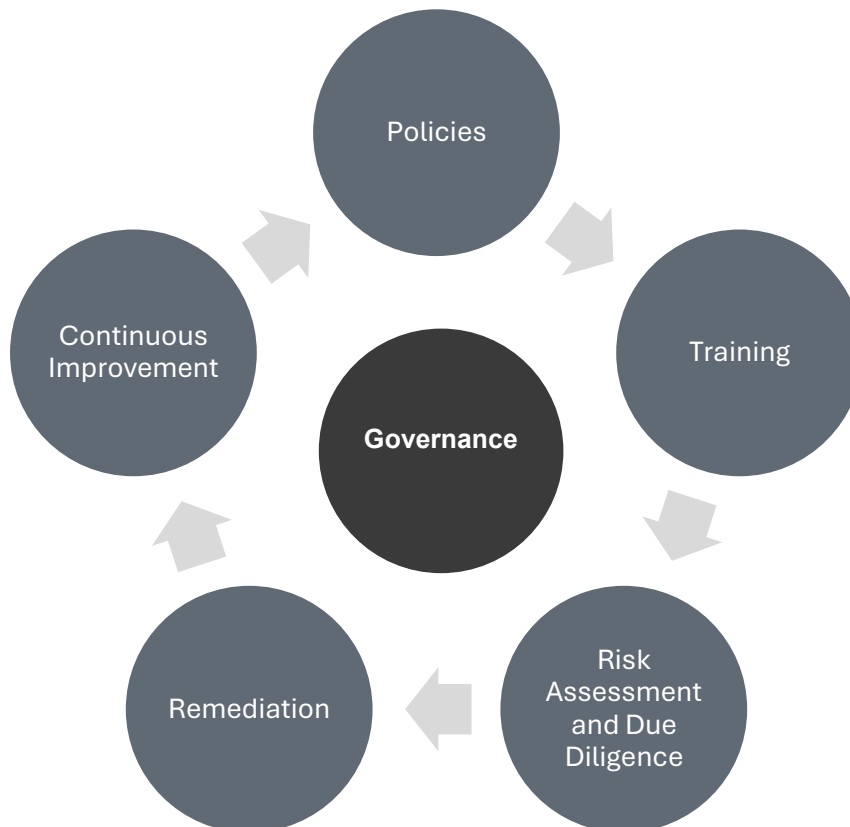
# Actions Taken to Assess and Address Identified Modern Slavery Risks

We seek to proactively assess and address modern slavery risks in our operations and supply chains. Importantly, we also integrate our response to modern slavery into our broader work to respect human rights. The Avis Budget Group is committed to making the United Nations Global Compact (UNGC) and its principles, which include commitments to human rights and labour rights. Part of the company's strategy, culture, and day-to-day operations. As one of the leading providers of mobility solutions worldwide, Avis Budget Group plays an important role in supporting the Sustainable Development Goals. Our corporate policies incorporate the UNGC Ten Principles, and reflect the concepts of fairness, honesty, and respect for people and the environment in our business actions.

Our actions to assess and address modern slavery risks in our operations and supply chains are based on five key elements that are supported by a governance framework:

- Policies
- Training
- Risk Assessment and Due Diligence
- Remediation
- Continuous Improvement

The following sections outline our governance framework and explain our work across each of these five elements areas.





## Governance

Our commitment to preventing modern slavery is grounded in a robust governance framework that provides a clear structure for accountability. The Pacific Legal function is responsible for developing and implementing the Group's Modern Slavery program and the wider Business Integrity and Compliance framework. The team reports to the Pacific Managing Director, who oversees the program's progress. The Pacific Legal function's mandate is to ensure that the Avis Budget Group meets its responsibilities to prevent modern slavery and other human rights risks.

To address modern slavery and other human rights risks, accountability is shared across different business areas of the organisation. Implementing actions to address these risks is a cross-functional effort that involves everyone in the company. A shared responsibility means that every employee has a role to play in ensuring the Avis Budget Group is a responsible and ethical company. The Group's commitment to tackling modern slavery is evident in its broader business practices, which reflect its core values of integrity and transparency.

In 2023, the Avis Budget Group achieved its goal to implement an ESG (Environmental, Social, and Governance) governance framework. This framework continues to prioritise business ethics, with a specific focus on modern slavery prevention. By formalising its commitment to preventing modern slavery in its governance framework, the Avis Budget Group demonstrates its dedication to addressing this issue. The framework will serve as a tool to promote transparency, accountability, and continuous improvement. As a company that values ethical behaviour and social responsibility, the Avis Budget Group is committed to doing its part to combat modern slavery.

## Policies and Procedures

The Avis Budget Group is dedicated to upholding numerous global policies that promote ethical and legally compliant business practices, as well as mitigate modern slavery risks throughout our supply chain. These policies serve as evidence of our commitment to preventing human rights violations such as modern forms of slavery within our business and supply chain. In the table below, we outline the key policies that are relevant to modern slavery and how they are implemented across our entire organisation.

We are committed to constantly improving and refining these policies to ensure that they remain effective. For instance, during the reporting period, we introduced the Modern Slavery Compliance Certificate to be executed by all Franchisees and relevant suppliers to ensure their businesses and practices align with our commitment to preventing modern slavery. This in turn strengthened our management of modern slavery risks by integrating the Certificate into our bilateral modern slavery compliance clauses in template contracts. These clauses require suppliers, including sub-contractors, to assess and address modern slavery risks within their operations and supply chains.

Our efforts to prevent modern slavery are ongoing, and we are continuously looking for ways to improve our policies and practices. For example, and for the first time ever, in 2024 we conducted interview-based audits of our Australian labour hire suppliers; marking a significant improvement in the way we manage and assess modern slavery in our Australian operations. *We are hopeful to extend this practice into New Zealand in the 3rd and 4th quarters of 2024.*

We recognise that the fight against modern slavery requires a long-term and concerted effort, and we are committed to doing our part to combat this issue. By continuously improving our policies and practices, we aim to set an example of ethical and socially responsible business conduct for the rest of the industry to follow.

Policy	Description	How Is It Implemented
<b>Code of Conduct</b>	The purpose of the Code of Conduct is to promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; to promote full, fair, accurate, timely and understandable disclosure in periodic reports required to be filed by the company; and to promote compliance with all applicable rules and regulations that apply to the company and its officers and directors. The Code of Conduct has been translated into 14 languages.	The Code of Conduct is publicly available on our Corporate website and is published on internal communication channels.  All of our employees are required to complete the Code of Conduct learning and module, agree to comply with our Code of Conduct policies and related policies, including those pertaining to ethics & integrity and anti-bribery. Managers also complete the “Receiving and Escalating Concerns” module. Additionally, we conduct awareness programs to support a “See Something, Say Something” culture across our organization.
<b>Human Rights Policy Statement</b>	Guided by our Human Rights Policy Statement, we strive to conduct our business in a manner consistent with the UN Guiding Principles on Business and Human Rights and the International Labour Organisation’s Fundamental Conventions. Central to our policy statement is the belief that child labour, human trafficking or other illegal, abusive, or forced labour practices have no place within our operations or our supply chains anywhere in the world. We focus on creating a culture and business environment based on transparency, inclusion, mutual respect, responsibility, and understanding.	To support compliance with the human rights standards set forth in our Third-Party Standards of Conduct, we encourage our partners and suppliers to periodically conduct self-evaluations to ensure that they, along with their subcontractors, complying with our human rights standards.
<b>Whistle-blower Policy &amp; Integrity Hotline</b>	Outlines the standards and procedures by which Avis Budget Group’s employees should report instances of non-ethical behaviours.  Our Integrity Hotline is available 24/7 and is a completely confidential channel for reporting serious concerns and complaints. Employees can reach the Integrity Hotline through dedicated phone lines or on the web. We maintain a non-retaliation policy that prohibits threats of retaliation or other discrimination directly related to any report made by an employee. All reported	We provide a link and number to our Integrity Hotline where employees can report potential concerns or grievances or ask questions about ethics or compliance.
<b>Third Party Standards of Conduct</b>	We recognize that our business has an impact on people, the communities where we operate, and the environment.  Fostering sustainable relationships with our business partners, agents, consultants, suppliers, and other third parties is important to our business success. It is part of our standard business practices to select reliable and	The Third-Party Standards of Conduct is published on our corporate website, is referenced in our Purchasing Terms & Conditions and is included as an integral part to any Supply Contract.

	<p>trustworthy partners as set forth by our Third-Party Standards of Conduct.</p> <p>While we cannot control all the activities and ultimate compliance of our business partners as they are independent entities, we aim to conduct appropriate diligence including research and analysis of a company or organization in the selection process to reduce risk and comply with the applicable laws. Our approach is to offer risk-based screening of our business partners to gauge their ability to comply with our Third-Party Standards of Conduct, as well as with applicable laws on corruption and bribery, competition and anti-trust, conflicts of interest, data privacy, and fraud.</p>	
<p><b>Sexual Harassment, Discrimination, Coercion and Intimidation</b></p>	<p>Our Sexual Harassment, Discrimination, Coercion, and Intimidation Policy is a comprehensive document outlining our commitment to providing a safe and respectful workplace for all employees and contractors. It defines unacceptable behaviours such as unwanted advances, offensive remarks, discriminatory actions (based on gender, race, ethnicity, religion, sexual orientation, or any other protected characteristic), coercion and intimidation practices.</p> <p>Ultimately, the goal of such a policy is to foster a work environment where every employee feels valued respected, and able to perform their duties without fear of harassment or discrimination.</p>	<p>The policy emphasises prevention through education and training programs aimed at raising awareness of what constitutes harassment, discrimination, coercion, and intimidation, as well as promoting a culture of respect and inclusivity.</p> <p>The policy also outlines procedures for reporting incidents, including confidential channels, and ensures that complaints will be promptly and impartially investigated. It also prohibits retaliation against individuals who report incidents or participate in investigations.</p> <p>Compliance with the policy is mandatory for all employees, with consequences for violations ranging from counselling and disciplinary action to termination, depending on the severity of the offense.</p>

## Training

In the Pacific, the Avis Budget Group has introduced a specific Modern Slavery Policy which outlines our approach to identifying and responding to risks of modern slavery practices within our supply chains and operations. All of Avis Budget Group’s personnel, suppliers and business partners must read, understand, and comply with this policy.

Since introduction of a specific Modern Slavery Compliance Training in 2021, 94% of our workforce have completed it. This includes 100% of Avis Budget Group’s Pacific Senior Leadership Team. This training is now one of the mandatory trainings for new employee as part of their induction process.

## Risk Assessment and Due Diligence

The Avis Budget group conducts Ethical Due Diligence prior to engaging with 3rd parties. The aim of this review is to consider the perceived initial risk associated with a number of factors. The main factors considered are the types of Industry, the associated Supply Chain locations, as well as the size and complexity of the engagement.

Specific and additional due diligence steps will be taken for the partners that fall into the higher risk profiles, ranging from specific questionnaire to specific contractual requirements for Supply Chain certification to recognised ethical standards (e.g. SMETA or Bsci).

## Remediation

We have implemented procedures and systems for employees and external individuals to report any concerns regarding unethical or illegal behaviour, including cases related to modern slavery. Multiple channels are available for reporting unethical conduct, such as speaking with their supervisor or contract manager, utilizing a dedicated email address, phone line, or online portal as outlined in our Employee Code of Conduct and 3rd Party Standard of Conduct. Reports submitted through these channels are treated confidentially and with respect for the complainant's protection.

To ensure awareness of our Whistleblower program, mandatory training courses, regular employee communications, and the Employee Code of Conduct are utilized. The Code of Conduct is also publicly accessible on our Corporate website and provides instructions on how to file a report. Additionally, our 3rd Party Standard of Conduct specifies the reporting process for suppliers and external parties.

In 2023, there were no reported incidents concerning modern slavery. However, we acknowledge that the absence of complaints does not necessarily indicate the absence of harm. If we were to receive a complaint from our employees regarding modern slavery, we would handle it in accordance with the established investigation protocols and internal grievance resolution guidelines of the organisation.

## Continuous Improvement

As part of the Avis Budget Group continuous commitment to improving its Business, we will seek to improve our Modern Slavery framework across the 2024 reporting period. The key initiatives that we will be working on are:

**Targeted Training** – We intend to continue to roll out targeted training on the Modern Slavery Risks to line managers that have influence/control on 3rd parties used by the Avis Budget Group

**Enhanced Governance** – We will enhance our ESG framework, which in turn will emphasise our commitment to the prevention of modern slavery in our business.

**Franchisees Engagement** – We will continue to review how we engage with our Franchisee network on the broad ESG fronts and more specifically on modern slavery responses

**Supplier Due-Diligence** – We are exploring opportunities to make our supplier due diligence processes more efficient, robust, and systemic through online questionnaires and Third-Party data validation. We will also again conduct anonymous interviews directly with employees of high-risk suppliers, to ensure a robust assessment.

**Contractual Framework** – We will continue to enhance how we ensure and track that key clause on modern slavery are present in our procurement, agents and franchisee contracts.

### 3. Assessing the Effectiveness of Our Actions

For the Avis Budget Group, effectively managing modern slavery risks means confidently demonstrating and communicating how we address this issue. We believe that the following key elements are critical to an effective response to modern slavery:

- A clear framework that sets expectations for our employees and supply chain partners, which is communicated throughout our business.
- A broad risk assessment and targeted due diligence processes that enable the timely and accurate identification, prevention, or mitigation of potential modern slavery risks.
- Trusted and accessible mechanisms to facilitate the reporting and remediation of modern slavery-related complaints, as well as non-compliance with the Avis Budget Group's 3rd Party Standard of Conduct.

We acknowledge that accurately tracking the effectiveness of our actions in managing modern slavery risk is complex and that high-level key performance indicators may not always provide a meaningful representation of effectiveness. Therefore, we are committed to continuing to monitor our operations and supply chain, researching available data to identify any changes in identified modern slavery risks, and collaborating with key industry peers.

We recognise that preventing modern slavery requires ongoing effort and a commitment to continuous improvement. We are dedicated to refining our policies and practices to ensure that we are doing everything we can to prevent modern slavery in our business and supply chain. By being transparent about our efforts and working collaboratively with our stakeholders, we aim to set an example of ethical and responsible business conduct that inspires others in the industry to join us in this fight.

### 4. Finalisation

This statement was approved by the principle governing body of the Avis Budget Group as defined in the *Modern Slavery Act 2018 (Cth)* on 20 June 2024.

This statement was signed by the Avis Budget Group's Managing Director and Director responsible for Modern Slavery, on 20 June 2024.



Tom Mooney

Managing Director, Pacific