

Review Date: 01.12.2023

Next Review Date: 01.12.2024

Contact: HR

1 Introduction

This Modern Slavery Statement sets out the actions taken by CLA Trading Pty Limited ACN 082 220 399 t/a Europcar (**Europcar**) to assess and address modern slavery risks in its Australian operations and supply chain for the financial year ending 30 June 2023. This Modern Slavery Statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth).

Europcar recognises the risk of modern slavery globally and its continuing prevalence in some industries and global markets. Europcar is firmly committed to ensuring that no element of modern slavery exists in Europcar's operations or supply chains.

2 About Europcar

Europcar is a major player in mobility markets and is part of the Europcar Mobility Group, which is headquartered in France.

Europcar is wholly owned by CLA Holdings Ltd ACN 084 548 283, with G1 Holdings (Australia) Pty Ltd ACN 111 575 574 as the parent company.

Europcar's principal business activity is car and light vehicle rental leasing services under the brand, 'Europcar'. This involves the supply of vehicles to our customers, provision of insurance, maintenance of our fleet of vehicles, and purchasing and disposal of vehicles.

As at December 2023, Europcar has around 460 corporate employees of which 355 are based in Operations in Europcar's rental stations and approximately 105 are based in Europcar's Headquarters located in Tullamarine, Victoria.

Europcar operates in all Australian States and Territories, with around 120 locations Australia wide. This includes 41 franchise and agency locations.

3 Europcar's Supply Chain

Europcar's supply chain includes both overseas and Australian based suppliers. Europcar's supply chain entails:

- Manufacturers, distributors and repairers of automobile and other vehicle supplies;
- Personnel engaged through Europcar's wash partners and reservations call centre / back office as part of Europcar's operational processes;
- Professional services including legal, tax and other accounting services;
- Insurance;
- IT and office equipment and consumables;
- Software; and
- Telephone and internet.

Europcar's motor vehicles are purchased from Australian suppliers, however America, Germany, Japan, China, South Korea, Italy and France are identified as the original source.

4 Risks of modern slavery practices in the operations and supply chains

Europcar recognises that as a volume purchaser of goods, particularly motor vehicles, the business conduct and performance of its suppliers can have a significant impact on its performance and reputation within the communities in which it operates.

To that end, Europcar aims to conduct business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights.

As it currently stands, Europcar's supply chain is predominantly limited to Australia, however, in terms of key areas of potential risk, it is noted that:

- Europcar has a reservations call centre and some back office support roles that are based in the Philippines. Europcar considers these direct outsourcing arrangements to be low risk; and
- Europcar engages contract cleaning service providers in Australia. Although Europcar recognises that the cleaning industry is generally considered to be a high risk industry globally because of its characteristics, products and processes, Europcar considers its direct outsourcing arrangements in this respect to be low risk in particular because of the strength of Australian employment laws, and as a result of Europcar's diligence steps when engaging with contractors.

Europcar recognises that there will be areas in its supply chain (in particular, beyond direct supplier arrangements, such as instances of suppliers sub-contracting their work) in respect of which it has low visibility.

5 Actions taken by Europcar to assess modern slavery risks

Europcar acknowledges that the modern slavery risks in its supply chain vary depending on its suppliers' industry, geographic location and company size. Therefore, the scope of Europcar's policies, processes and systems reflect these specific risks.

Europcar's policy is that suppliers with whom it deals directly are assessed to determine that they meet a sufficient level of integrity. Those assessments can assist Europcar in identifying potential instances of modern slavery, and include consideration of:

- the nature of the supplier (private or public entity);
- the type and strength of relationship with Europcar;
- the amount of the contract with Europcar;
- the country where the third party is located; and
- the activity and/or sector of activity of the third party.

6 Actions taken by Europcar to address modern slavery risks

As part of Europcar's initiative to identify, mitigate and respond to modern slavery risks, Europcar:

- Abides by a **Code of Ethics and Commitment**, under which Europcar's guiding principles include:
 - complying with national and international laws and regulations;
 - respecting the dignity and the human and property rights of Europcar's employees, customers, industrial and commercial partners, and shareholders, whether they are defined by local or international legislation, regulations or standards;
- **Observes various conventions of the International Labor Organization** including Conventions 29, 105, 138 and 182 which concern child labour and forced labour;

- Undertakes responsible procurement by engaging only with suppliers who operate in a manner consistent with **Europcar's Supplier Compliance Statement**, as required in Europcar's supplier agreements, which requires suppliers who engage personnel to work on Europcar sites to declare to Europcar, every quarter, that:
 - they have taken all reasonable steps to ensure that they have complied with their obligations under the relevant work health and safety legislation;
 - all personnel engaged by them have the right to work in Australia; and
 - they have complied with all of their statutory and industrial obligations under legislation and all applicable industrial instruments, including any applicable modern awards or enterprise agreements and the National Employment Standards;
- Promotes transparency by **encouraging whistle-blowers** to report instances of unethical, unlawful or undesirable conduct in accordance with Europcar's Ethics Principles and Whistleblowing Tools*; and

*Note: The Whistleblowing Policy will be revised in 2024 – the objective is to review the existing Whistleblowing system and elevate reinforcement of whistle-blower protection and ensure there are accessible channels for employees, suppliers and third parties to report concerns.

Europcar's responsible procurement is further reinforced in its **Code of Ethics and Commitment** which outlines Europcar's objective to choose industrial and commercial partners who are able to provide guarantees that they comply with:

- the ban on child labour and forced labour;
- the ban on practices detrimental to human dignity;
- implementation of legal mechanisms that guarantee employee representation and the defence of labour rights within the company;
- compliance with regulations applicable, in particular, to working conditions and working hours;
- implementation of mechanisms designed to promote open labour relations, where they exist; and
- compliance with applicable regulations regarding health and the environment.

In addition to the above, Europcar requires (via its supplier agreements) its suppliers to comply with its local **Corporate Social Responsibility Supplier Policy**. This Policy which requires suppliers to declare that they respect the basic human rights of employees, including:

- refusing to employ or make anyone work against their will;
- refusing to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
- complying with the maximum number of working hours laid down in the applicable laws; and
- employing no child, and observing the International Labor Organization Convention 138.

7 **Assessing the effectiveness of actions**

Europcar requires its supply chain wash partners (i.e. contract cleaners) to complete self-audits periodically in relation to their compliance with Australian employment laws. Europcar also sent key supply chain partners with annual compliance material containing information about compliance which addresses Modern Slavery and partners are required to acknowledge and sign off the Modern Slavery (and other compliance) policy.

- 8 Further, during the reporting period, Europcar checked with its suppliers to confirm their ongoing adherence to Europcar's Corporate Social Responsibility Supplier Policy (as noted above under Point 5, this policy requires – among other things – respect for human rights and compliance with legislated maximum working hours).

Europcar does not own or control any other entities and therefore mandatory reporting criteria 6 in the Act is not relevant. However, Europcar, in partnership with its stakeholders, will continue to review and develop its Modern Slavery Statement as its risks and business models change. This Modern Slavery Statement will be reviewed each year with reasonable endeavours to consult relevant stakeholders, and updated as appropriate.

This statement was approved the board of directors of Europcar in its capacity as principal governing body of Europcar on 11 December 2023, and is signed by the Managing Director of Europcar.



Benoit Garel

Managing Director

December 11, 2023

Date