MODERN SLAVERY STATEMENT

PACIFIC REGION

avis budget group

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INTRODUCTION



This statement is a joint statement made by Avis Management Pty Ltd (ABN 50 001 889 336), W. T. H. Pty Ltd (ABN 15 000 165 855), Budget Rent A Car Australia Pty Ltd (ABN 89 007 348 021), Budget Rent A Car Operations Pty Ltd (ABN 55 054 583 925) and Apex Car Rentals Pty Ltd (ABN 65 159 894 970) (together "**Avis Budget Group**"). The following related Australian entities are also part of the Avis Budget Group and are covered by this statement: W. T. H. (Sub 1) Pty Ltd (ABN 86 070 810 703), AB Funding Pty Ltd (ABN 95 125 104 654) and AU Holdco Pty Limited (Australia) (ABN 57 159 895 744).

The following related overseas entities are also covered by this statement: Avis Rent A Car Limited (New Zealand) (NZBN 9429040195810), W. T. H. (Sub 2) Pty Ltd (NZBN 1172297), Budget Rent A Car Limited (New Zealand) (NZBN 9429039997920), Apex Car Rentals (New Zealand) (NZBN 9429030667440) and National Car Rentals (Private) Ltd (Singapore) (Co.Reg.No: 196100157E). This statement, pursuant to the Modern Slavery Act 2018 (Cth), reports on the risks of modern slavery in Avis Budget Group's operations and supply chains, and actions taken to address those risks during Avis Budget Group's financial year ended 31 December 2020 ("2020").

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 fairly paid, treated with dignity and provided with a safe working environment.

This is our first Modern Slavery Statement ("MSS"), which addresses our obligations contained in the Modern Slavery Act 2018 (Cth).

ORGANISATIONAL STRUCTURE



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OUR BUSINESS AND OPERATIONS



Avis Budget Group is a mobility solutions provider carrying on business in Australia through subsidiary entities. Avis Budget Group, through its subsidiaries, provides mobility solutions such as passenger and commercial vehicle hire to car sharing worldwide. Avis Budget Group also remarkets its fleet to a network of auto industry buyers. Avis Budget Group's supply chains include vehicle manufacturers, telecom/technology providers; vehicle parts/repairs, uniforms, transportation.

Avis Budget Group operates globally in more than 10,600 locations in approximately 180 countries.

In Australia, more than 187 locations comprised of agency operators, franchises and our own premises, across the main brands of Avis, Budget and Apex.

Australian corporate head office is located at Level 1, Tower B, 197-201 Coward Street Mascot NSW 2020. Avis Budget Group employs over 1460 people across Australia, New Zealand and Singapore as of 18 June 2021.

SUPPLY CHAIN



Avis Budget Group, through its subsidiaries, provides mobility solutions such as passenger and commercial vehicle hire worldwide.

Avis Budget Group also remarkets its fleet to a network of auto industry buyers.

Our supply chains include vehicle manufacturers, telecom/technology providers; vehicle parts/ repairs, uniforms, transportation.

GOVERNANCE APPROACH

Avis Budget Group adheres to a number of global policies in place that are intended to promote ethical and legally compliant business conduct as well as mitigate modern slavery risks in our supply chain. These policies demonstrate our organisation's commitment to preventing violations of human rights such as modern forms of slavery in our business and in our supply chain. Below are descriptions of each of these relevant policies as they apply to Avis Budget Group.

We have a global **Code of Conduct** which sets out Avis Budget Group's commitment to, among other things:

- Adhering to the highest standards of ethics, integrity and compliance in all aspects of our business;
- Conduct our business in accordance with all applicable laws, standards and ethical business practices;
- Promote and facilitate open communication and raising of concerns;
- Providing our employees with a healthy and safe work environment that complies with all applicable occupational safety and health laws and standards;
- Promoting a competitive marketplace and complying with applicable antitrust and competition laws that are designed to foster fair and open competition;
- Holding our suppliers to the same high standards we set for ourselves and conducting thorough due diligence to monitor our suppliers' adherence to those standards; and
- 7. Conduct our business legally and ethically.

Avis Budget Group maintains a **Workplace Health** & Safety Policy and Global Safety Policy Statement which outlines the requirements for the management of workplace hazards and risks to as low as reasonably practicable to eliminate or reduce the incidence of personal injury, property damage and/or loss.

Avis Budget Group maintains a **Human Rights Policy & Statement** which demonstrates our respect for fundamental human rights and supports global efforts to protect them. We strive to conduct our business in a manner consistent with the United Nations Guiding Principles on Business and Human Rights and the International Labour Organisation's Fundamental Conventions.

The Human Rights Policy upholds Avis Budget Group's Due Diligence Standard Operating Procedure and sets out Avis Budget Group's commitment to, among other things:

- (a) the prohibition of all forced labour;
- (b) the prohibition of all forms of child labour not part of a government authorised job training;
- (c) compliance with all applicable wage and hour laws and regulation, in particular those relating to minimum wages, overtime, maximum hours and piece rates;
- (d) safe working environments for all employees of a supplier or partner; and
- (e) encouraging partners and suppliers to conduct self-evaluations to ensure that they are along with their subcontractors, complying with our human rights standards.

GOVERNANCE APPROACH

The **Third Party Standards of Conduct** represent Avis Budget Group's commitment to foster sustainable relationships with our business partners, agents, consultants, suppliers and other third parties. These Standards ensure that all Third Parties uphold ethical standards and adhere to social and environmental responsibilities for the good of the communities that we serve and the promotion of human rights.

Avis Budget Group expects that Third Parties, in all their activities, will comply with all applicable laws, rules and regulations of the countries and localities in which they operate, whether or not specifically referenced in these Standards. Avis Budget Group's expectations are set out as part of the vetting process when new suppliers are engaged. Avis Budget Group's Third Party Standards of Conduct form part of its agreements with suppliers.

The Standards require Third Party's commitment to, among other things:

- (a) comply with all applicable local, national and international laws, regulations, treaties and industry standards, including, without limitation, those pertaining to the manufacture, pricing, sale and distribution and safety of the relevant products and/or services.
- (b) not use child labour unless it is part of a government-authorized job training or apprenticeship program and then only in strict compliance with all applicable laws and regulations.
- (c) comply with all applicable wage and hour laws and regulations, including those

relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits.

- (d) not use forced labour, regardless of its form.
 Avis Budget Group will not tolerate physically abusive disciplinary practices.
- (e) provide a safe working environment that supports accident prevention and minimizes exposure to health risks.

Our partners and suppliers are encouraged by Avis Budget Group to periodically conduct self-evaluations to ensure that they and their subcontractors comply with our human rights standards, and requires them to use this information to identify and mitigate risks. Avis Budget Group raises this with suppliers in quarterly and yearly reviews. Suppliers are required to report to Avis Budget Group any risks that cannot be mitigated and that may impact the products or services they supply to Avis Budget Group.



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WHISTLEBLOWER POLICY



In addition to the above policies, Avis Budget Group encourages the reporting of suspected unethical, illegal, fraudulent, corrupt or dishonest conduct and shall ensure that those who report may do so with confidence and without fear of intimidation, ramifications or adverse consequences.

Avis Budget Group's **Raising Your Concerns and Reporting Violations Policy** (Reporting Policy) outlines the standards and procedures by which Avis Budget Group's employees should report instances of non-compliance.

The Reporting Policy sets out the type of conduct that should be reported, including any breach or potential breach of Avis Budget Group's Code of Conduct, unlawful conduct, financial malpractice or dangers to the public, the environment, or to anyone working for Avis Budget Group, that may be occurring despite our rigorous compliance procedures. The Reporting Policy sets out the reporting procedure for employees to follow if they have concerns of the conduct mentioned above. It also sets out antiretaliation rules in relation to any director, officer or employee who reports in good faith under the policy.

The Reporting Policy also sets out how Avis Budget Group will protect those who report, including taking every reasonable precaution to keep the reporter's identity confidential, consistent with conducting a thorough and fair investigation.

The Integrity Hotline described in the policy (Globally: 1-888-732-1413, in Australia: 1-300-327-659, in New Zealand: 0-800-005421, in Singapore: 800-852-3912) is designed to ensure those "speaking up" about misconduct have a safe and confidential avenue to do so.

ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Avis Budget Group has undertaken various actions to specifically assess and mitigate modern slavery risk.

The types of practices which our suppliers are contracted to undertake include:

- (a) Uniform supply
- (b) Printing collaterals
- (c) Telecom (mobile phones & services)
- (d) Automotive spare parts & accessories
- (e) Fuel & Oil
- (f) IT services
- (g) Security monitoring services
- (h) Marketing & Media services
- (i) Cleaning Services (facilities)
- (j) Cleaning & detailing services (fleet)
- (k) Autoglass repairing
- (I) Corporate & Professional Services

A majority of these services are provided from within Australia. However, Avis Budget Group does engage suppliers from outside Australia.

For our supply chain, Avis Budget Group has introduced the **Third Party Standards of Conduct** referred to above which serve as the foundation of our relationships and represent our commitment to ensuring that our suppliers uphold ethical standards.

Avis Budget Group maintains a relationship of trust and transparency with its suppliers by conducting regular quarterly and yearly reviews with suppliers and internal business unit stakeholders. In addition, Avis Budget Group requires its suppliers to ask for approval before using any sub-contractors to fulfil part of or an additional supply service to Avis Budget Group. Avis Budget Group requires suppliers to use certified labour hire companies only.

Avis Budget Group has introduced a 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.

Avis Budget Group will provide compliance training that will be regularly delivered to employees. In particular, employees who have responsibility over supply chain management will be provided with training in relation to modern slavery risks and our approach to identifying and limiting those risks within our supply chains and operations. This training is expected to be rolled out during 2021.

Avis Budget Group will be rolling out a questionnaire to all suppliers to determine risks of modern slavery practices.



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MEASURING OUR EFFECTIVENESS



As noted above, Avis Budget Group will be rolling out a questionnaire to all suppliers to determine risks of modern slavery practices.

Avis Budget Group has an **Enterprise Risk Management (ERM)** program that proactively identifies, analyses, mitigates, and monitors global risks across 5 risk families: Strategic, Operational, IT, Finance, and Legal/Compliance.

Avis Budget Group develop an annual audit plan based on the results of the risk assessments completed in the ERM program. Internal audits are carried out continually over the financial year to provide assurance on the control environment. We have an Internal Audit committee in the US comprising of a team of approximately 15 dedicated Internal Auditors. Risk management is part of our **Workplace Health and Safety Policy.** It falls into the 'Identify the Risks and Planning' component of the model. Our process follows standard risk management principles of identify, access, control and review.

Avis Budget Group has a Workplace Health and Safety and the Environment risk register that is reviewed by senior management on an annual basis as part of the 'Review Performance' element of the management model.

All integrity hotline queries are reviewed by Corporate Compliance and the HR director. If any trends or reoccurring issues appear, they are investigated.

CONSULTATION WITHIN AVIS BUDGET GROUP



Avis Budget Group will notify all of its owned and controlled entities of their obligations under the Modern Slavery Act 2018 (Cth) and provide them our modern slavery policy and this statement.



FINALISATION



This statement was approved by Avis Budget Group's Board of Directors on 28 June 2021.

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