



Albert Automotive Holdings Pty Ltd  
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## Modern Slavery Statement 2020

This Statement is published in accordance with the Modern Slavery Act 2018 (Cth) (Act) and outlines the steps Albert Automotive Holdings Pty Ltd and its group companies has taken to assess and address the risk of modern slavery in our business and supply chains during the financial year ending 30 June 2020. This is our first Modern Slavery statement under the Act.

### 1. The reporting entities

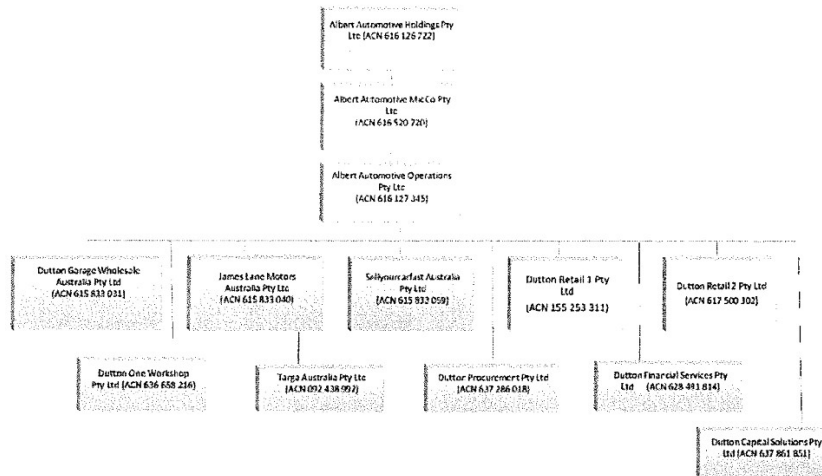
The single joint Statement covers the following group entities:

- Albert Automotive Holdings Pty Ltd (AHH);
  - Albert Automotive MidCo Pty Ltd;
  - Albert Automotive Operations Pty Ltd;
  - Dutton Garage Wholesale Australia Pty Ltd;
  - James Lane Motors Australia Pty Ltd;
  - Sellyourcarfast Australia Pty Ltd;
  - Dutton Retail 1 Pty Ltd;
  - Dutton Retail 2 Pty Ltd;
  - Dutton One Workshop Pty Ltd;
  - Targa Australia Pty Ltd;
  - Dutton Financial Services Pty Ltd;
  - Dutton Procurement Pty Ltd; and
  - Dutton Capital Solutions Pty Ltd
- (collectively, **Dutton Group**).

### 2. Structure, operations and supply chains

AHH is the parent company of a diversified group of companies that provide automotive wholesale, retail and associated services operating in the pre-owned automotive sector. We have 13 sites across Australia, in New South Wales, Victoria, Queensland, South Australia, and Western Australia. We employ over 210 people across Australia.

The group structure is as follows:



Dutton Group is Australia’s largest, national used car wholesaler dealing in general, prestige and luxury cars. With a proud history dating back to 1911, our reputation has been built on a consistently superior level of service, an enviable network of relationships and an unmatched understanding of the automotive industry.

Dutton Group operates the following businesses:

- **Dutton Garage** - Dutton Garage is one of the world’s premium retailers of classic and collectable cars with our iconic showroom based in Melbourne, Australia.
- **Dutton Garage Wholesale** - Dutton Garage Wholesale is Australia’s largest national wholesaler of used vehicles, delivering cars to the largest dealer network in Australia.
- **Dutton Procurement** - Working with some of the top insurance providers and fleet companies, Dutton Procurement manages every aspect of the buying process while simultaneously delivering the lowest prices.
- **Dutton One** – Dutton One sells prestige used vehicles from 8 locations across Victoria, New South Wales, Queensland and South Australia.
- **Sell Your Car Fast** - Sell Your Car Fast was established to help people sell their cars quickly, fairly and with no time wasted. It is our mission to provide a smart and seamless way car owners can sell their car, get the offer they deserve and move on.
- **Targa** – With a proud history dating back to 1992, Targa’s reputation has been built on our ability to deliver high-quality tarmac rally events in unique destinations within Tasmania, Victoria and Queensland.
- **Dutton Financial Services** - Dutton Financial Services has a dedicated team of professionals who have in-depth knowledge of the automotive & finance industry. We make financing new cars easy, with in-depth knowledge to tailor a finance plan which best suits our customer’s needs.

Our supply chain includes predominantly Australian based suppliers, by volume and value they overwhelmingly relate to the supply of used vehicles from private individuals and corporations located in Australia. We acquire automotive parts, consumables such as oil, fuel, paint and lubricants, logistics and transport services, car-washing and detailing services, marketing services, cleaning, storage and waste disposal services, professional services, financial products, insurance, property rental and vehicle storage, information technology, telecommunication products and services and general office and workplace supplies. We also purchase a variety of sub-let services from Australian small businesses and trades.

Our records indicate that, excluding private individuals from who we purchased used vehicles, we have just over 3,000 suppliers, although we would not have purchased from all of them during the reporting period. Purchases from overseas suppliers are uncommon.

### 3. Risks of Modern Slavery Practices in our Operations and Supply Chains

Dutton Group has sought to understand the inherent modern slavery risks in our operations and supply chains.

The risks of modern slavery in Dutton Group's operations are low. There is no known vulnerability to modern slavery in our activities (automotive wholesale, retail and associated services operating in the pre-owned automotive sector), and these sectors are all highly regulated in Australia.

Insofar as the supply of goods and services to Dutton Group are concerned, we have undertaken a high-level assessment of modern slavery risks within our first-tier supply chains. This consisted of engagement with an externally appointed advisor, a review of external suppliers across our operations, as well as engagement with internal stakeholders for their input on likely areas of higher risk of modern slavery. The outcome of that assessment is that our risk profile indicates that risks of modern slavery are more likely to occur further down the supply chain.

### 4. Actions Taken to Assess and Address Risks

Dutton Group has taken the opportunity to take the following actions in an effort to address potential modern slavery risks in our supply chains:

- **Employee conduct:** As both a preventative and detective measure, we have developed and instituted a Modern Slavery Policy across the group. Our Modern Slavery Policy affirms our commitment to acting ethically and with integrity in all our business dealings and relationships, and to implementing appropriate systems and controls designed to ensure Modern Slavery is not taking place anywhere in our own business or in any of our supply chains.
- **Whistleblower Policy:** Our Modern Slavery Policy sits hand-in-glove with our existing Whistleblower Policy, which provides us with sound procedures to allow all employees and their families to identify and report genuine concerns about illegal conduct or any improper state of affairs pertaining to the group, without fear of reprisals.
- **Supplier contracting:** As a preventative measure, we have developed standard contracting provisions requiring our suppliers to comply with all applicable modern slavery laws, take all necessary steps to ensure that there is no modern slavery in their supply chains, implement and maintain appropriate due diligence procedures for their own suppliers, and notify us of any suspected modern slavery in their supply chains.
- **Due diligence:** As a detective measure, we have developed a comprehensive supplier questionnaire, to assist us in conducting further due diligence in relation to modern slavery risks with key suppliers and select new suppliers, and in developing a deeper understanding of modern slavery risks below our first-tier suppliers.
- **Supplier Code of Conduct:** Developed a comprehensive Supplier Code of Conduct, which sets out our expectations of a high standard of ethical conduct and compliance with all applicable laws. As we implement this Code of Conduct, Suppliers will be expected to be ethical in their business activities, including relationships, practices, sourcing and operations, including in relation to the array of labour and human rights.
- **Training:** We have developed an update to our mandatory employee compliance training to include a component on modern slavery risks and compliance.

### 5. Tracking the Effectiveness of our Actions

We will task internal stakeholders with conducting periodic reviews of the arrangements we implement to address modern slavery risks in our operations and supply chains, to determine whether they are effective or require further refinement or improvement.

## 6. Consultation

Dutton Group operates from centralised headquarters in Richmond, Victoria, the natural consequence of which involves consultation with all subsidiary entities described above in the preparation of this Statement.

## 7. Other information

We note that the COVID-19 pandemic began to take hold in Australia during the reporting period, however at this stage we have been unable to ascertain any specific risks of modern slavery that may have emerged as a result of COVID-19. If any such risks emerge in 2021, we will incorporate them into our 2021 Modern Slavery Statement.

## Approval

This Modern Slavery Statement was approved by the Board on 30 March 2021.

A handwritten signature in black ink, appearing to read 'M.S.H.', followed by a long horizontal flourish.

**Matthew Hanson**  
Chief Operating Officer / Chief Financial Officer  
30 March 2021