



# STILLWELL MOTOR GROUP

Modern Slavery Statement 2021



## 1. Introduction

Stillwell Motor Group opposes slavery in all its forms. This statement describes the steps we took during the financial year ending 30 June 2021 to seek to minimise the risk of modern slavery occurring in our business and supply chains.

## 2. Our Structure, Operations and Supply Chain

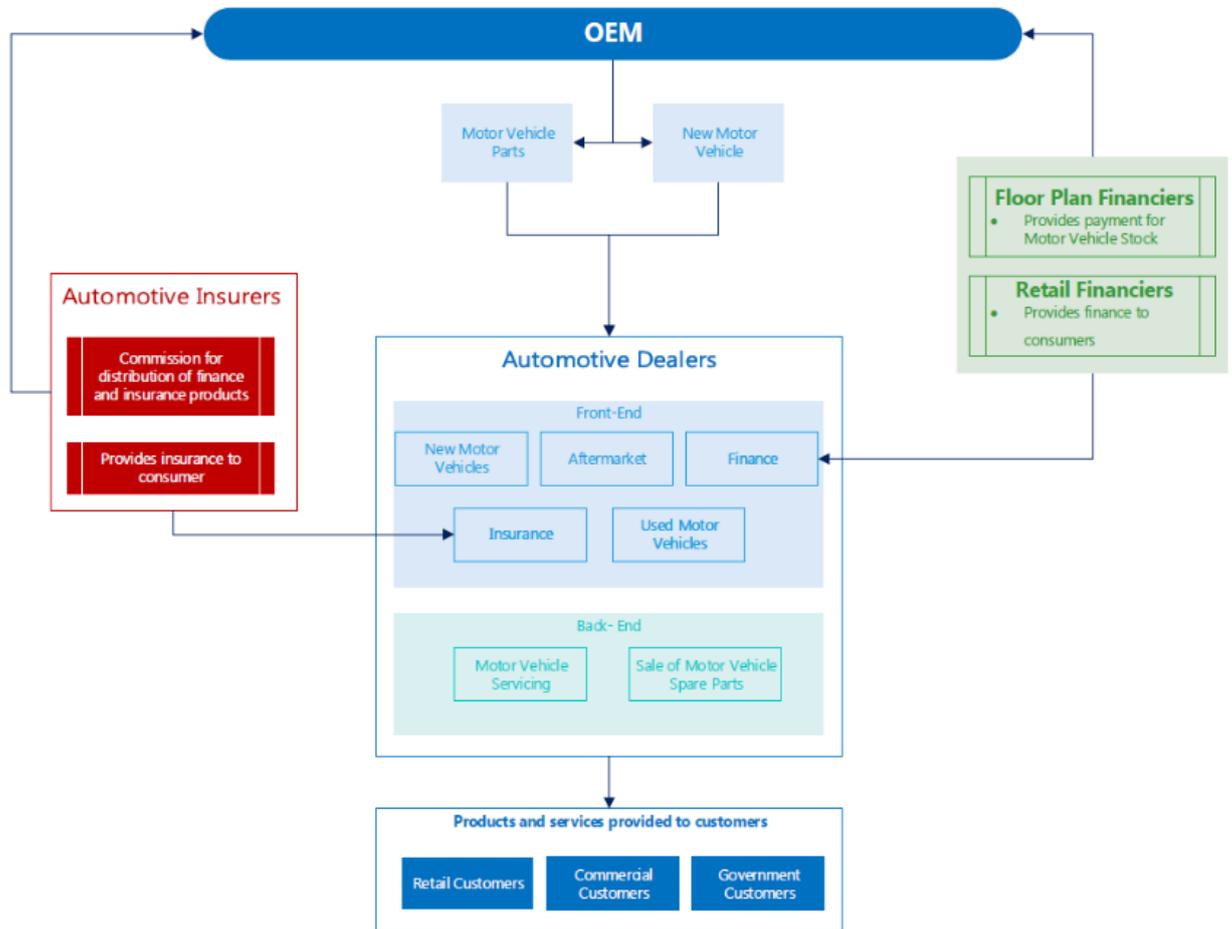
Stillwell Motor Group is an Australian business specialising in the sale of premium motor vehicles, vehicle servicing and repairs, parts retailing and wholesaling.

Stillwell Motor Group is a Melbourne based family business which was established in 1949. This Statement is submitted as a joint statement on behalf of all reporting entities within Stillwell Motor Group including;

- Brighton BMW
- Mornington BMW
- Volvo Cars Brighton
- Volvo Cars Camberwell
- Volvo Cars Doncaster
- Volvo Cars South Yarra
- Jaguar Land Rover Brighton
- Essendon Volkswagen
- SMG Wholesale Parts

Our supply chains include the following goods and services: vehicles and parts, consumables such as oil, fuel, paint and lubricants, logistics and transport services, car washing and detailing services, sublet, recruitment services, marketing and printing services, cleaning, storage and waste disposal services, professional services, finance products, insurance, property rental and vehicle storage, information technology, telecommunication products and services, coffee, food and beverage, gift hampers and office supplies.

### 3. Automotive Supply Chain



### 4. Human Rights Governance

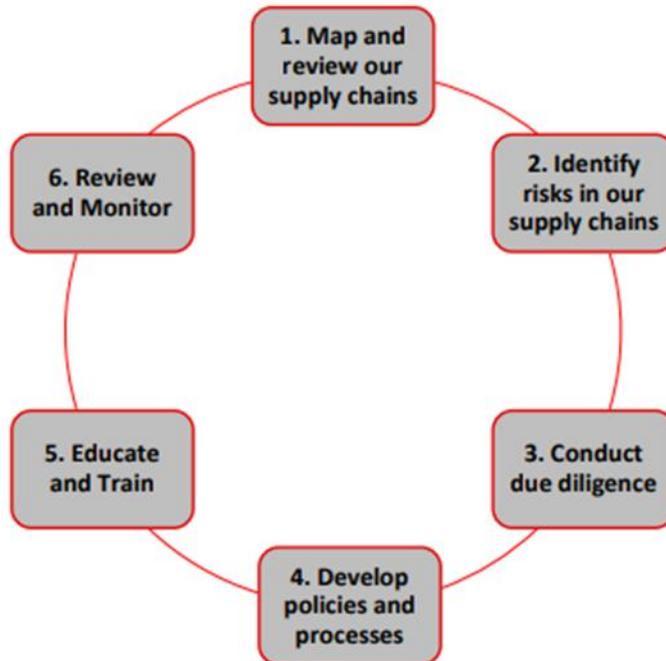
Stillwell Motor Group's Audit and Risk Committee has responsibility for overseeing the Group's response to Modern Slavery risks.

The Board approves the Modern Slavery Plan on an annual basis. Management report to the Audit and Risk Committee throughout the year in relation to the Group's progress with the Modern Slavery Plan. The Board was responsible for approving modern slavery related policies such as the Supplier Code of Conduct and this statement.



Finance, People and Culture and Operations	Audit and Risk Committee	SMG Board
<p>Representatives from Finance, People and Culture, and Operations are responsible for formulating and managing the implementation of our Modern Slavery Plan. This group is led by our Head of People and Culture.</p> <p>They identify, manage and report on modern slavery risks, conduct due diligence activities, and manage our reporting obligations.</p>	<p>The Head of People and Culture presents our Modern Slavery Plan to the Audit and Risk Committee.</p> <p>The Audit and Risk Committee oversees the processes and procedures undertaken.</p> <p>The Head of People and Culture reports to the Audit and Risk Committee on the progress of our Modern Slavery Plan and identified risks.</p>	<p>The Audit and Risk Committee presents the Modern Slavery Plan to the Board for approval.</p> <p>The Modern Slavery Plan is reviewed and approved by the Board annually.</p> <p>The Audit and Risk Committee reports to the board the progress of our Modern Slavery Plan and identified risks.</p>

## 5. Modern Slavery Due Diligence Framework



## 6. Potential Risks of Modern Slavery in our Supply Chains

The risks of modern slavery practices mean the potential for an entity to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains. Our risk profile indicates that risks of modern slavery are more likely to occur further down the supply chain.



Our focus in FY2021 was on our highest value suppliers, namely vehicle manufacturers (OEMs) and higher risk sectors such as cleaners, car washers and detailers. In the case of OEMs, the risk of modern slavery is likely to occur in subsequent tiers of supply, however, this risk is mitigated by OEMs having their own anti-slavery policies and procedures in place. Cleaners, car washers and detailers work in a high-risk sector that can often involve the use of unskilled and temporary labour and foreign workers.

## 7. Due Diligence and Remediation

During the reporting period we undertook several due diligence enquiries.

We reviewed existing contracts and asked our suppliers in the focus areas to complete a due diligence questionnaire. The questionnaire asked questions about the supplier's awareness and procedures in relation to modern slavery risks. For larger suppliers, we collected copies of modern slavery statements they prepared. We also checked our payroll records for instances of multiple employees living at the same address.

Stillwell Group provides employees, suppliers and their families with a confidential, independent whistleblowing service that is accessible 24/7, 365 days which can be used to report suspected cases of modern slavery.

We adopted remediation guidelines that set out how Stillwell Group will respond to a suspected case of modern slavery. The guidelines acknowledge that there is no one size fits all approach to remediation as each matter is unique and should be handled in a way that is proportionate to the harm and puts the victim first. Stillwell Group has appointed a Modern Slavery Team responsible for handling complaints or suspected instances of modern slavery.

## 8. Our Policies and Procedures

Stillwell Group developed a Supplier Code of Conduct which is available on our website and intended to set the minimum standards expected of our suppliers. We have developed a supplier on-boarding questionnaire to help assess the risks or issues associated with the supplier prior to contracting with them. This process was rolled out in FY21.

Our employee on-boarding procedures were updated to flag potential modern slavery risks in FY20. Stillwell Group maintains several policies that support the Group's efforts in addressing modern slavery risks. Our Whistleblower Policy, Code of Conduct, Compliance with Laws and Company Governance, Equal Opportunity Policy and Citizenship Policy relating directly to diversity in the workplace and assisting foreign citizens to obtain employment in Australia.

These amendments were reviewed and approved by the Board.

## 9. Next Steps

We have a plan for FY21, including training to employees that are involved in procurement, further updates to our policy guidelines to reflect mitigating risks of modern slavery and Stakeholder awareness. We will build on our due diligence questionnaires and provide them to suppliers as part of our FY21 plan.



Signed

*Colin Gamble*

Colin Gamble  
Chief Executive Officer

Signed

*Marianne Stillwell*

Marianne Stillwell  
Chair  
Ross House Investments Board of Directors

Signed off by the Board and CEO on 13<sup>th</sup> May 2020.