



**GILBARCO  
VEEDER-ROOT**

AUSTRALIA | NEW ZEALAND



**Teletrac**  
Navman

# MODERN SLAVERY STATEMENT 2021

Gilbarco Australia Pty Ltd



# MESSAGE FROM THE MANAGING DIRECTOR

OUR FIRST MODERN SLAVERY STATEMENT OUTLINES OUR ONGOING APPROACH TO IDENTIFYING AND MANAGING MODERN SLAVERY RISKS IN OUR BUSINESS.

At Gilbarco Australia we make it our business to ensure that whatever matter we approach, we do so in an ethical, fair, and transparent manner – and this is no different to the matter of Modern Slavery.

We uphold, respect and promote the human rights of every person – which includes those employed in our operations through to those who are employed with our suppliers.

We do not see the eradication of modern slavery as merely a compliance issue, rather as an opportunity to build further towards being a sustainable business that lives its values such as ‘Stronger Together’ and ‘Create What’s Next’ as well as the behaviours behind some of our values, such as being ‘Self-Aware’ and ‘Accountable’.

Modern slavery is a significant global issue. Data and insights suggest that globally, there are over 40 million people trapped in slavery. Further, it is approximated that 25 million people in the world are in forced labour with 18 per cent of those in the construction industry, and another 22 per cent within manufacturing.

Due to the extensive nature of our materials supply chain network, business is conducted with suppliers in a variety of global contexts including in countries where local law may not exist to protect populations vulnerable to forced labour or human trafficking risks. We recognise that we have a responsibility to affect change through the choices we make in our supply chain and procurement practices.

By establishing good governance, systems, processes, and capability to identify and manage modern slavery in our supply chain, as well as working collaboratively across other industries to share knowledge, we aim to shine a light on this important issue.

Our approach is iterative and risk-based, with an overarching aim to create positive, sustainable change. We collaborate with other Australian businesses, as well as those within our industry, to align our work with best practice and ensure that what we learn contributes to the broader goal of eliminating slavery.

I look forward to continuing to add to the work already in motion on this important matter.

Stephen Richards  
Managing Director  
Gilbarco Veeder-Root

We uphold, respect and  
promote the human rights  
of every person

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# INTRODUCTION & OVERVIEW

This is a joint statement prepared by Gilbarco Australia Pty Ltd on behalf of its subsidiary and controlled entities - Gilbarco Veeder Root, Navman Wireless Australia Pty Ltd and Navman Wireless New Zealand Pty Ltd.

This FY20 Modern Slavery Statement, made pursuant to the Australian Modern Slavery Act 2018 (Act), sets out the actions taken by Gilbarco Australia Pty Ltd to address modern slavery risks in our business and supply chain for the financial year ending 30 June 2021. The Act requires certain large entities to assess their operations and supply chains for modern slavery risks, and to transparently disclose their efforts to address these risks. Each section in this Statement corresponds to a mandatory criterion of the Act.

Preventing modern slavery practices is a complex issue which has a global impact, and eliminating the potential for modern slavery practices in our operations and supply chain is key to our commitment. Gilbarco Australia Pty Ltd takes responsibility to further develop and refine processes and systems with our suppliers, clients, workforce and external stakeholders to increase

**We support the Act and recognise the role business can play in ensuring their operational practices are in line with applicable laws and guidance, and in using their position when engaging suppliers and contractors.**

compliance and our understanding of modern slavery risks, and the role Gilbarco Australia Pty Ltd can play to address them.

## UNDERSTANDING MODERN SLAVERY

Under the Act, modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. It includes eight types of serious exploitation including trafficking in persons, forced labour, debt bondage and the worst forms of child labour. These constitute human rights violations and serious criminal offences, with severe consequences for victims, and are prohibited under Australian and international law. Modern slavery occurs when a victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work. Modern slavery is best understood on a continuum of labour practices. While distinct from dangerous or substandard working conditions, the existence of these issues can be warning signs of modern slavery. Conversely, preventing substandard conditions and improving work practices can help prevent slavery. Gilbarco Australia Pty Ltd recognises that modern slavery is often hidden and exacerbated by complex supply chains.



## WHO WE ARE

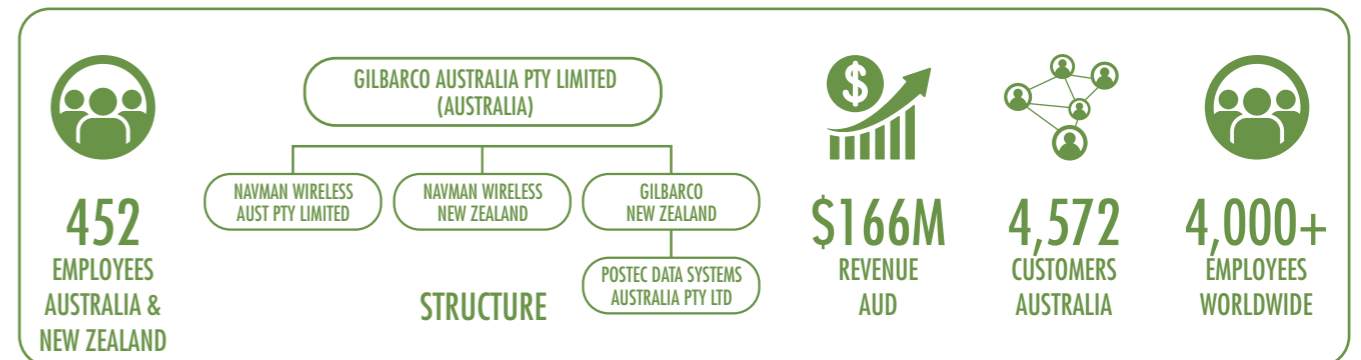
Gilbarco Australia Pty Ltd is a supplier of fuel dispensers, point of sales systems, payment systems, fleet tracking software, fleet management software, forecourt merchandising and support services. The company operates as a subsidiary of Vontier and its headquarters are in Greensboro, NC United States. It employs approximately 4,000 people worldwide, with sales, manufacturing, research, development and service locations in North and South America, Europe, Asia, the Pacific Rim, Australia, New Zealand, the Middle East and Africa.

## OUR STRUCTURE

Headquartered in Sydney, Gilbarco Australia Pty Ltd comprises of three main operating entities, including:

- **Navman Wireless Australia Pty** and **Navman Wireless New Zealand** focusing on the production and sale of fleet tracking and management software and hardware solutions.
- **Gilbarco Veeder Root** specialising in engineering, design, development, marketing, sales and service, the company offers Gilbarco fuel pumps and dispensers, retail automation and comprehensive maintenance services.

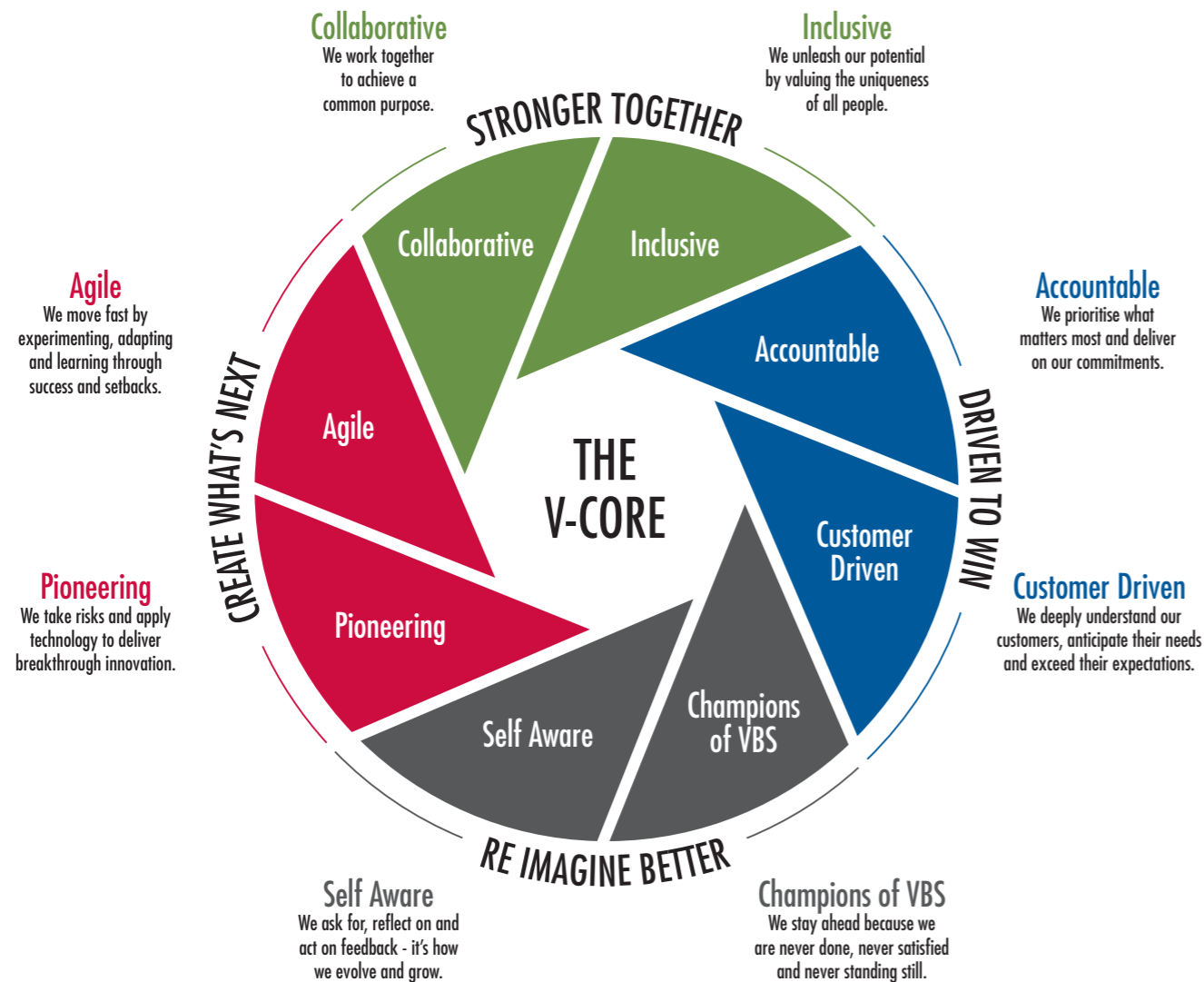
Eliminating the potential for modern slavery in our operations and supply chain is key to our commitment



# OUR CORE VALUES

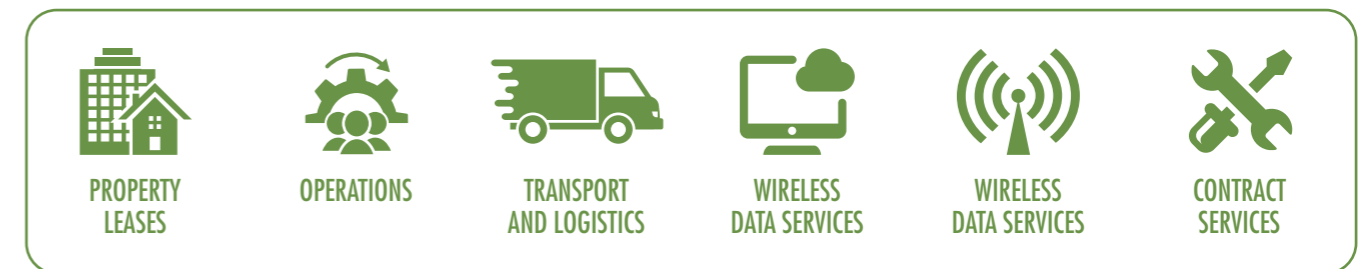
VONTIER IS A GLOBAL COMPANY FOCUSED ON TRANSPORTATION AND MOBILITY. GILBARCO & NAVMAN ARE PART OF THE VONTIER OPERATING COMPANIES AND HAVE INDUSTRY-LEADING EXPERTISE IN RETAIL AND COMMERCIAL FUELLING AND FLEET MANAGEMENT.

WE ARE UNITED BY OUR PURPOSE: MOBILISING THE FUTURE TO CREATE A BETTER WORLD. OUR VALUES AND THE VONTIER BUSINESS SYSTEM (VBS) POWER EVERY ASPECT OF OUR CULTURE AND PERFORMANCE.



# WHO WE ARE: SUPPLY CHAIN

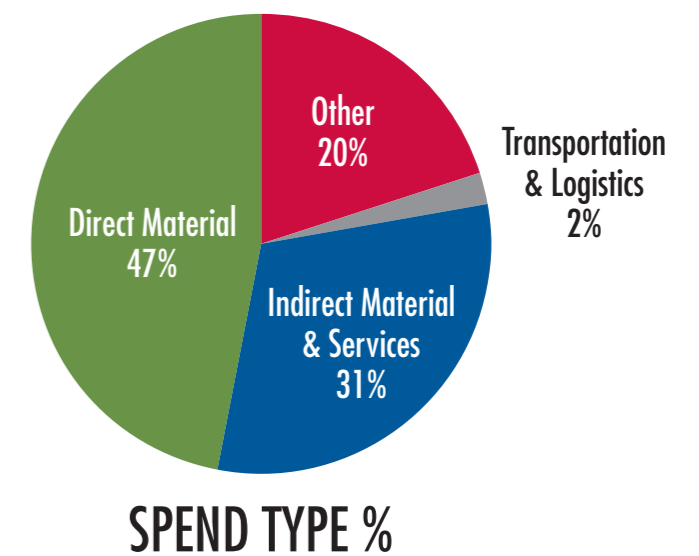
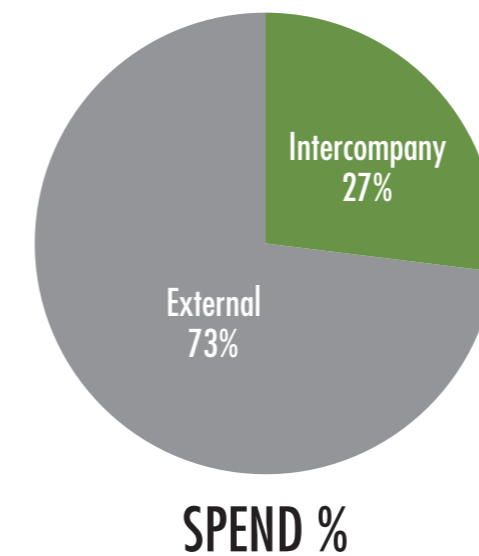
GILBARCO AUSTRALIA PTY LTD CONTRACTED WITH APPROXIMATELY 900 SUPPLIERS ACROSS MULTIPLE CATEGORIES WITH A TOTAL SPEND GREATER THAN AUD\$85M IN FYE 2020.



These suppliers provide goods and services required to support the delivery of products and services to our customers.

■ **Navman Wireless Australia and Navman Wireless New Zealand suppliers** provide electronic cellular or satellite enabled devices, wireless data service, and fleet installation service to facilitate the use of our proprietary tracking and fleet management software platforms.

■ **50% of Gilbarco Australia Pty Ltd spend** was on intercompany factories for direct material for fuel pumps and retail automation. A proportion of external spend relates to property leases, operations, IT and Logistics in addition to direct material and contract services.



# MODERN SLAVERY RISK AREAS

**DUE TO THE EXTENSIVE NATURE OF OUR MATERIALS SUPPLY CHAIN NETWORK, BUSINESS IS CONDUCTED WITH SUPPLIERS IN A VARIETY OF GLOBAL CONTEXTS INCLUDING IN COUNTRIES WHERE LOCAL LAW MAY NOT EXIST TO PROTECT POPULATIONS VULNERABLE TO FORCED LABOR OR HUMAN TRAFFICKING RISKS.**

In line with the Modern Slavery Act, we embarked on a journey to assess risk within the core operations of Gilbarco Australia Pty Ltd.

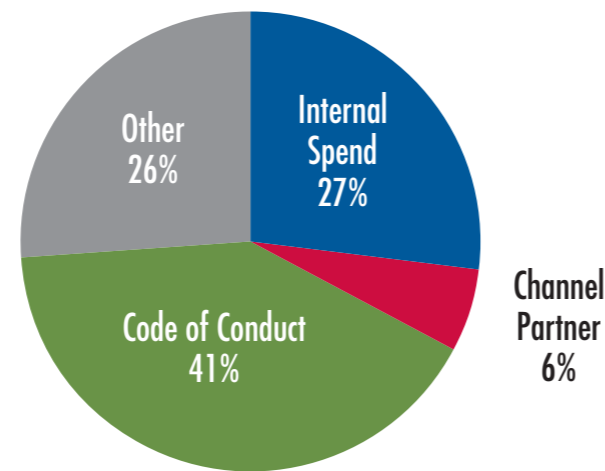
A number of criteria were used to focus on and identify supplier risk profiles. These criteria included:

- **Geography:** Suppliers located in locations where there is an elevated risk of slavery & human trafficking.
- **Intercompany suppliers:** A significant portion of Gilbarco Australia Pty Ltd's spend was identified as from Intercompany factories.
- **Channel Partners:** Third-party Channel Partners are already managed globally through Vontier channel partner due diligence program. This includes all logistics providers.
- **Offshore 3rd party:** A number of Navman direct material suppliers were identified as using 3rd party offshore contract manufacturers to produce hardware devices.
- **Categories of indirect spend** such as professional services (property, legal etc) and contract services (construction, cleaning etc).
- **Value of spend:** High value spend suppliers were prioritised.

As a control measure for identified risk, various activities are conducted in line with our code of conduct, such as:

- **Channel Partner:** Significant due diligence applied in supplier selection and ongoing compliance using tools such as Steele's Ethics and Compliance Platform.
- **Supplier code of conduct:** In the form of direct SoC acknowledgement or through contractual T&Cs.

The extent of spend covered by these controls in 2020 was:



**COMPLIANCE METHOD  
SPEND %**

# ADDRESSING OUR MODERN SLAVERY RISKS

- **Gilbarco Australia Pty Ltd's Code of Conduct (The Vontier Code)** sets out the behaviours expected of employees worldwide. The Vontier Code specifically covers our commitment to promoting Human Rights and understanding Human Rights impacting every aspect of our business.
- **Gilbarco Australia Pty Ltd's expectations** of its suppliers in the areas of integrity and compliance, environment, health & safety, labour and employment are set out in our Supplier Code of Conduct. Our Supplier Code of Conduct is further reinforced by linking it through to our supplier order process, where it is directly referenced.
- **Gilbarco Australia Pty Ltd's goal** is to build a strong foundation in addressing Modern Slavery and to build on it in the coming years.
- **Gilbarco Australia Pty Ltd is committed** to taking further actions to strengthen our relationships with suppliers in relation to Modern Slavery and reducing inherent risks, this will include but is not limited to:
  - Completing a deeper analysis and risk assessment of Supplier Code of Conduct coverage with our suppliers.
  - Driving greater coverage of Supplier Code of Conduct, focusing in on higher-risk suppliers.
  - Driving greater coverage and consistency in ensuring purchase orders reference our Supplier Code of Conduct.
  - Engaging our higher-risk/higher spend suppliers to garner support and review their Modern Slavery statements.



**The Vontier Code specifically covers our commitment to Human Rights.**

# GLOBAL POLICIES

## POLICIES AND PROCEDURES RELEVANT TO MODERN SLAVERY ACT.

Gilbarco Australia Pty Ltd and its wider group (Vontier) deplore human trafficking and modern slavery in all its forms. We support the Modern Slavery Act and its underlying aims.

Vontier's direct employees shall be free to choose employment and Vontier does not engage in slavery or human trafficking.

It is the established policy of Vontier that workers at direct supplier facilities have the right to freely choose employment. Vontier further expects that all suppliers who do business with Vontier and its subsidiaries will comply with all applicable laws, including the laws against forced or involuntary labour, and this expectation is embodied in [Vontier's Supplier Code of Conduct](#). The Company wholeheartedly support these values and objectives.

A significant portion of Vontier's Code of Conduct for Suppliers addresses labour standards. This part of the Code of Conduct mandates fair treatment in terms of remuneration and working conditions and prohibits abusive, violent or demeaning conduct towards employees as well as precluding all forms of involuntary or child labour, including prison, bonded or indentured labour, and engagement in any form of human trafficking, as well as discrimination.

Vontier employees are trained on Vontier Code of Conduct obligations and expectations using a mandatory online training module. They are also required to acknowledge and agree to the Vontier Code of Conduct when onboarding.

Vontier maintains internal accountability standards for all employees, including employee obligations to report breaches of the Vontier Code of Conduct provisions, which include terms specifying that employees are encouraged to raise questions when unsure about any integrity or compliance issue. Employees are required to report any actual or potential violations of law and to comply with all applicable laws. These employee accountability standards would require an employee to disclose an identified circumstance of slavery or human trafficking.

Vontier maintains a [Speak Up! reporting helpline](#) which concerned parties, including direct suppliers and employees, may use to report improper behaviour by any supplier or by employees of Vontier or its operating companies, including issues relating to human trafficking and slavery.

# HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS

## TO MONITOR THE EFFECTIVENESS OF OUR ACTIONS AS WE PROGRESS IN OUR MODERN SLAVERY JOURNEY, WE WILL:

- **Supplier Code of Conduct compliance:** Monitor the number of suppliers who acknowledge Vontier's Supplier Code of Conduct.
- Address concerns raised through the [Speak Up! reporting helpline](#) and take appropriate actions.
- Hold regular meetings with our MSA steering committee as a platform to keep the conversation going as we progress on our journey and commitment.



Vontier has a [Speak Up! reporting helpline](#) which allows employees and suppliers to report improper behaviour

## CONSULTATION

We recognise that it is important for Gilbarco Australia Pty Ltd to take a collaborative approach to combatting modern slavery. A number of stakeholders were included in the preparation of this Modern Slavery Statement, including Supply Chain, Sales, Legal, Human Resources and Finance.

Additionally, we have consulted with Gilbarco Australia Pty Ltd subsidiaries when preparing this statement. We will continue to take a collaborative and cross-functional approach to modern slavery at Gilbarco Australia Pty Ltd for future reporting periods. We are currently considering ways to strengthen our control measures through assessment tools.

In addition, prior to approval, this statement was reviewed by:

- Global Compliance Team
- Global Legal Team
- Global Supply Chain Team
- Directors at GVR Australia & Teletrac Navman



**It is important to take a collaborative approach to combatting modern slavery.**

## OTHER RELEVANT INFORMATION

**IN FEBRUARY 2021, OUR PARENT ENTITY VONTIER BECAME A SIGNATORY OF THE UNITED NATIONS GLOBAL COMPACT. VONTIER IS COMMITTED TO MAKING THE UNITED NATIONS GLOBAL COMPACT AND ITS TEN PRINCIPLES PART OF THE STRATEGY, CULTURE, AND DAY-TO-DAY OPERATIONS OF VONTIER.**

### HUMAN RIGHTS:

**PRINCIPLE 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**PRINCIPLE 2:** Make sure that they are not complicit in human rights abuses.

### LABOUR:

**PRINCIPLE 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**PRINCIPLE 4:** The elimination of all forms of forced and compulsory labour;

**PRINCIPLE 5:** The effective abolition of child labour; and

**PRINCIPLE 6:** The elimination of discrimination in respect of employment and occupation.

### ENVIRONMENT:

**PRINCIPLE 7:** Businesses should support a precautionary approach to environmental challenges;

**PRINCIPLE 8:** Undertake initiatives to promote greater environmental responsibility; and

**PRINCIPLE 9:** Encourage the development and diffusion of environmentally friendly technologies.

### ANTI-CORRUPTION:

**PRINCIPLE 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

# INCLUSION, DIVERSITY & EQUITY (ID&E) AT GILBARCO AUSTRALIA PTY LTD

WE ARE PROUD TO SAY THAT WE ARE MORE THAN AN EQUAL OPPORTUNITY EMPLOYER.

We actively promote an inclusive work environment where all colleagues have the opportunity to succeed and demonstrate a commitment to inclusion at all levels and in every community, and our mantra is 'I belong here'.

Together we celebrate the uniqueness of all people. It's at the core of who we are, and the fuel that drives our success.

How we put Inclusion, Diversity and Equity (ID&E) into action:

- We are fiercely committed to this work: we boldly stand up for what we believe in and have the courage to speak up.
- We start with ourselves: we show up as our most authentic self, and are aware of our actions, beliefs, and mindsets.
- We create diverse and inclusive teams: we deliberately seek out, listen to, and respect each other's ideas and voices as we build a culture of belonging.
- We are equitable: we provide equitable access to advancement, opportunities, information, and pay/profits for all.

Together we celebrate the uniqueness of all people. It's at the core of who we are and the fuel that drives our success.

i belong here!







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