



# Modern Slavery Statement

## for the Financial Year 2022

This statement is made pursuant to the Modern Slavery Act 2018 by the Custom Fleet Group for the financial year ending 31 December 2022.

This statement was approved by the Board of Directors of Custom Fleet on 26 April 2023.

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**Chris Tulloch**  
Chief Executive Officer  
Custom Fleet

A handwritten signature in black ink that reads "Chris Tulloch". The signature is written in a cursive style with a large, prominent "C" at the beginning.



# Structure, operations and supply chains of reporting entities

Custom Fleet is a leading fleet management and vehicle leasing organisation, providing fleet management solutions including funding, acquisition, remarketing, maintenance management, commercial vehicle compliance, accident management and driver risk management services to customers in metropolitan and regional Australia for approximately 41 years.

Custom Fleet's head office is based in Melbourne, Victoria. We have over 2500 customers serviced by dedicated local sales, customer service and operations centres located in Australia and New Zealand. The Custom Fleet Group is comprised of EFN (Australia) Pty Limited and its wholly owned Australian subsidiaries Element Financial (Australia) Pty Limited, Element Fleet Services Australia Pty Ltd, Custom Fleet Pty Limited and Custom Service Leasing Pty Limited. References to "Custom Fleet", "we", "us" or "our" are to the Custom Fleet Group. Custom Fleet Group is wholly owned by Element Fleet Management Corp., which is listed on the Toronto Stock Exchange (TSX: EFN).

Custom Fleet's board of directors provides leadership and approves and monitors the strategic direction, risk management systems, values, business plans and policies of Custom Fleet Group to uphold corporate reputation and maximise value.

Our supply chain of approximately 3680 suppliers includes vehicle manufacturers and suppliers, vehicle component manufacturers and suppliers as well as suppliers in other supporting areas such as information technology, procurement and marketing.

Custom Fleet firmly believes in fostering respect and upholding basic human rights. We also believe that, together with the broader business community, we have a critical role to play in fighting all forms of discrimination, oppression, forced labour and slavery. This includes ongoing actions to identify risks of slavery within our business and supply chains and the implementation of measures to prevent or mitigate against such risks.





# Steps to assess and manage risks

We have assessed the risk of modern slavery in our supply chain by considering:

- ▷ the countries in which our suppliers have operations;
- ▷ the industry sectors that suppliers operate in;
- ▷ whether suppliers employ low-skilled migrant workers;
- ▷ whether suppliers have a modern slavery policy prohibiting modern slavery practices;
- ▷ whether suppliers undertake modern slavery due diligences to identify, prevent and mitigate modern slavery risks in their operations or supply chain;
- ▷ whether suppliers provide modern slavery training to staff who have procurement responsibilities; and
- ▷ whether suppliers have processes in place for reporting modern slavery related concerns.

Custom Fleet recognises that the risk profile of our supply chain will change from time to time necessitating ongoing monitoring and appropriate changes to our modern slavery program.

Currently our efforts are focussed on the following.

## 1. Encouraging reporting

Custom Fleet's staff are encouraged to report any instances of unlawful or improper conduct. Our 'Speak Up' campaign also encourages staff to raise (anonymously, if desired) any concerns about misconduct within our operations or supply chain.

The 'Speak Up' program and Whistleblower Policy is reviewed and circulated regularly to ensure ongoing awareness for all staff.

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## 2. Supplier due diligence questionnaire

In our last two modern slavery statements our focus has been on suppliers with elevated modern slavery risks (tyres, manufacturers, IT and glass). For the period under review, we concentrated on suppliers engaged in vehicle hire, fuel and business payment solutions. All suppliers who were sent our questionnaire responded, with all demonstrating a strong commitment to identifying, preventing and managing modern slavery risks in their operations and supply chains.

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## 3. Training

We have implemented training for our procurement team, assisting them to understand the nature of modern slavery and associated risks.

Obtaining relevant information and assessing what our suppliers (and prospective suppliers) are doing to prevent modern slavery is a key component of the procurement function.

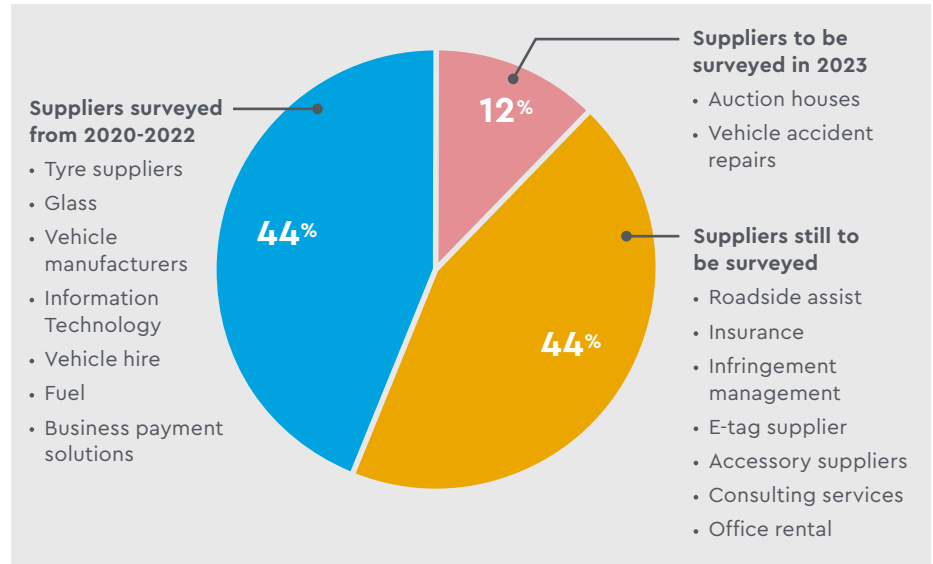
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## 4. Recruitment

We abide by local employment laws and regulations for hires directly into Custom Fleet. We only directly hire candidates with approved rights to work, and at or above award conditions.

## Effectiveness of our actions

It is encouraging to note the level of participation by our suppliers regarding our questionnaire, with 100 percent of the questionnaires having been completed and returned. Responses indicate varying levels of maturity in our suppliers modern slavery risk management programs, but also demonstrate, we believe, an overall desire by the suppliers to comply with their modern slavery obligations.



## Future actions

We acknowledge that our modern slavery risk management and reporting must evolve and improve over time. In accordance with Custom Fleet's commitment to continual improvement, we plan to expand the ambit and effectiveness of our modern slavery programme in the coming year by:

- ▶ Conducting a review of the content, format and manner of delivery of our supplier questionnaire.
- ▶ Expanding the number of suppliers who are required to complete the questionnaire. A large proportion of our suppliers are not required to submit Modern Slavery Statements because they do not meet the legislated annual revenue threshold. However, their inclusion in our questionnaires will serve to provide us with a more accurate assessment of our supply chain's compliance with modern slavery obligations.
- ▶ Reviewing our supplier onboarding process.
- ▶ Expanding modern slavery training to include employees in the Risk, Legal and Human Resources Departments.
- ▶ Reviewing our policies and procedure to ensure overall alignment with our modern slavery program.

## Process of consultation

The questionnaire, its scope and contents, were discussed and consulted on with the Chief Operating Officer and the Procurement Director. The content of this statement have been reviewed and approved by the Board of Directors of each of the entities making up the Custom Fleet Group.



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