

Modern Slavery Statement **2021**



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Disclosure Note

This statement has been made on behalf of Club Assist Corporation Pty Ltd. This Statement covers all entities owned or controlled by Club Assist Corporation Pty Ltd. Each one is covered by Club Assist's policies, procedures and systems, including those relating to contracting, purchasing and human resources.

ACN 054 184 842



A statement from our Chairman

Club Assist Pty Ltd (CAPL) provides automotive batteries and roadside assistance. We source, store, distribute, and install automotive batteries. Club Assist also offers roadside services including jump starting, alternator and starter motor replacement and vehicle inspection, serving customers and clients throughout Australia.

While our standing in the world market has been cemented over a 30 year history, our governance needs constant review and enhancement to ensure we maintain that position.

We are committed to understanding, meeting, and demonstrating our compliance with Modern Slavery legislation and supporting our supply base to understand their requirements and how they can meet them. This is evidenced in last year's statement and the cumulative summary of progress in years 1 and 2 in this statement.

The financial year ending 30th June 2021 has been a particularly challenging operational year internationally and locally due to the global pandemic, but we remain on track to complete our three year road map with the actions outlined for Year 3 within this document.

We have taken positive steps to identify and address our modern slavery risks. We have made strong progress through our three year road map with our committed team and are confident we can lead the way in managing modern slavery risks across the automotive services sector.

This statement was approved by the Board of Directors of Club Assist Corporation Pty Ltd at the Board meeting on 28 October 2021.

Peter MacCuspie
Chairman, Club Assist

About us

Club Assist has been specialising in battery technology for over 30 years, supported by an in-house quality assurance laboratory, a robust national supply chain network and strong global procurement capability.

Club Assist Pty Ltd (CAPL) provides lead-acid batteries across a number of industries in Australia, including the automotive, marine and recreational sectors.

We source, store, distribute, and install lead-acid batteries, and provide roadside services such as jump starting, alternator and starter motor replacement. Our head office is in the Melbourne CBD.

Nationally we employ more than 300 staff and manage a strong workforce of contractors. We are owned and backed by the Australian Motoring Clubs.

Company values

Our values of **We Can, We Do, We Care** underpin our culture and influence the way we interact with each other, our partners, clients and stakeholders. They represent what is important to us and guide our business success. Everyone across the business is responsible for living and displaying our values.



Our Operations within Australia

We fulfil distribution and logistics operations for automotive battery supply across every state and territory in Australia. We utilise our network to serve the Motoring Clubs and national wholesale customers, and operate roadside services in selected states and territories.

We pride ourselves on a safe, inclusive, and openly accountable culture across our operations team to enable world class service delivery.

Our progress on modern slavery governance to date is testament to our strong safety and people-focused organisational culture and leadership.

Our People

In Club Assist, our people will always be our most important asset. They drive the customer value proposition of the business. Our people determine customer experience and create the culture of the organisation.

- Currently we employ over 300 employees and over 100 contractors.
- We recruit in accordance with our Equal Employment Opportunity policy that includes Anti-Discrimination, Harassment and Bullying Policies, and take pride in our diversity across the business. Our Flexible Work Policy ensures we provide flexibility when required for working parents or carers, for example.
- Annual salary reviews are undertaken across all roles within the business. Where financial success of the business allows, salary increases in addition to CPI are awarded.
- Employees who meet annual performance measures also qualify for performance bonuses.
- Our Whistleblowing Policy was launched across the business in 2019. The Policy and the reporting systems that support it, provide employees and others with concerns about any aspect of a mechanism to voice these concerns without fear of retribution.

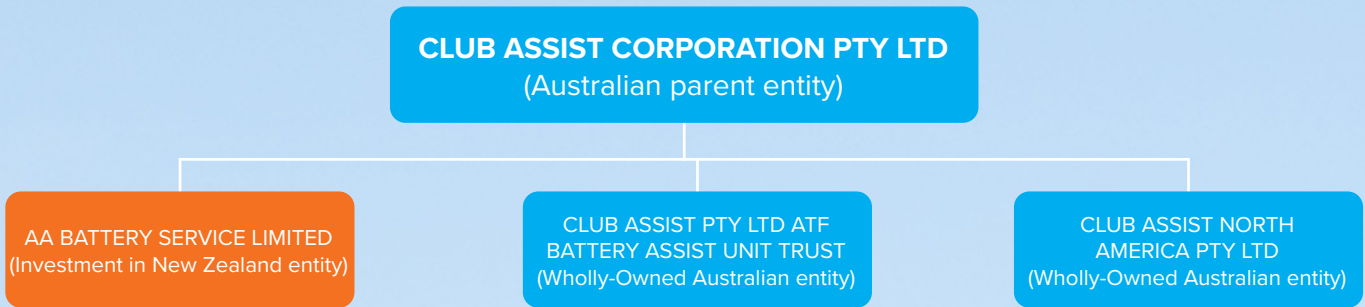


Club Assist Structure & Governance

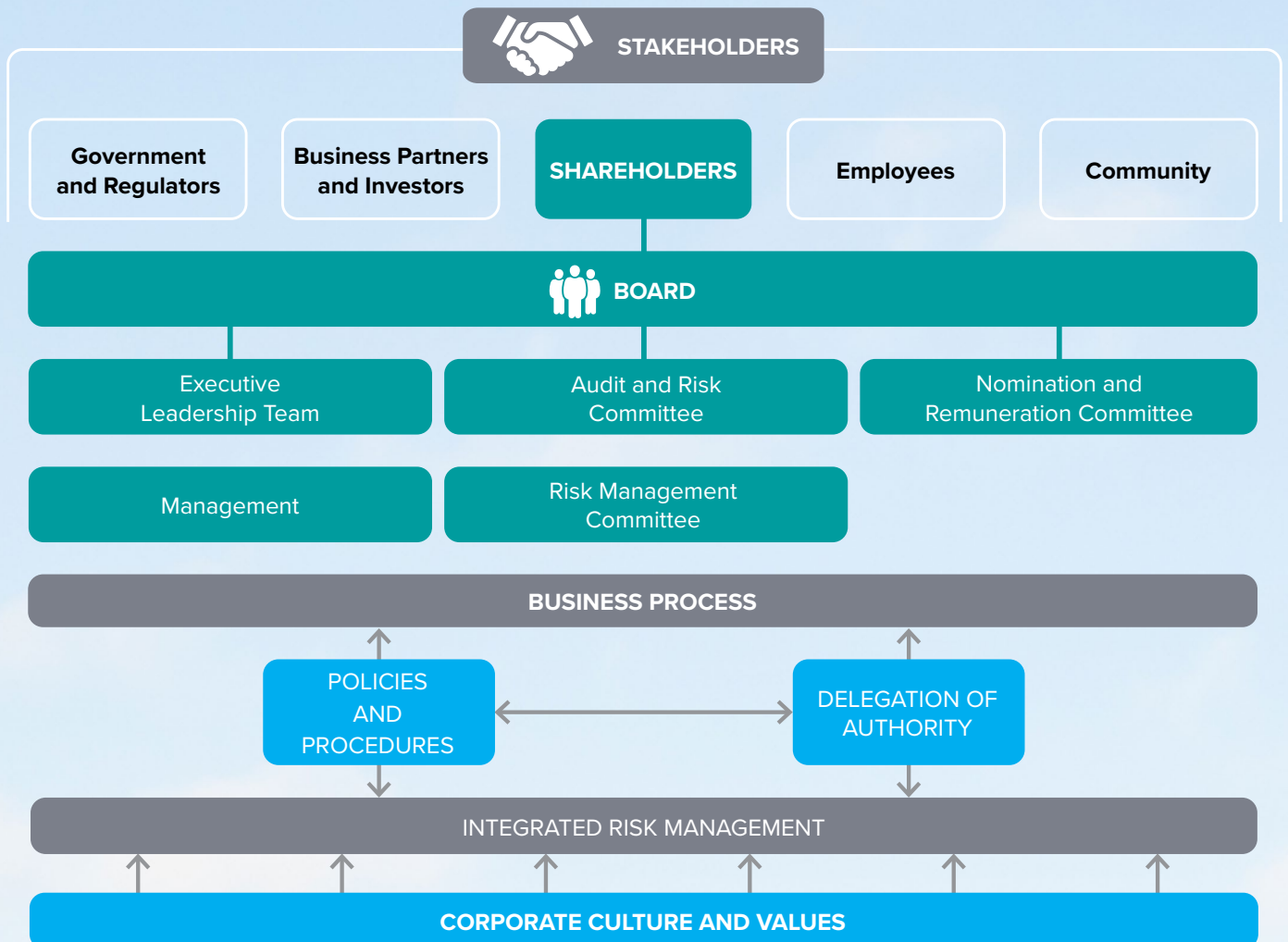
Our Organisational structure

Club Assist's shareholding is held by the motoring clubs in Australia and has operations in Australia, the USA, Canada and New Zealand.

CORPORATE STRUCTURE



OUR GOVERNANCE FRAMEWORK



Club Assist's exposure level to Modern Slavery risks facing global operations and supply chains

Operational risks

For 25 years we have been safely and sustainably providing roadside automotive parts and repair services. We comply with all labour, employment, immigration and whistle-blower laws of Australia and its states and territories, including the Fair Work Act and are committed to:

- working safely and looking out for the safety of our colleagues;
- providing a workplace free from harassment, discrimination and bullying;
- acting ethically and lawfully in all business conduct;
- engaging with our stakeholders respectfully and honestly; and
- building sustainable communities through providing local jobs, developing local skills and providing local business opportunities.

CAPL has programmes in place to address the above matters. CAPL has policies in place that ensure the pursuit of such objectives. Our Learning systems also educate the employees on their rights and privileges. While we consider the potential for us to cause or contribute to incidents of modern slavery to be low, areas of vulnerability in our operations include outsourced services such as use of cleaning, security and facilities management and possibly the use of labour hire contractors.

Supply chain risks
















We have identified our highest risk suppliers according to the following indicators:

- Industry sector – specific industry sectors deemed as high risk in international and national guidance documentation.
- Commodity/product – specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- Geographic location – based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.
- Workforce profile – in undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as '3D' work (dirty, dull or dangerous).

Recent studies show that the commodity and country that we import from are relatively low risk. While the risk of modern slavery in Australia is lower than many other jurisdictions (according to GSI data), we recognise that our Australian suppliers, who make up 10% of our spend provide us with goods and services across all high-risk categories and thus will require further engagement and assessment. This is part of the operational assessment action in Year 3 of our road map. High-risk goods and services are also procured directly from our international suppliers predominantly South Korea. We have compared our supplier profile with that of the study provided by GSI. From this, we do not see any glaring risk compared to our current supplier profile.

Figure 1:

List of products with identified risk of forced labour by source countries¹⁰

	Cotton: Kazakhstan, Tajikistan, Turkmenistan, Uzbekistan
	Bricks: Afghanistan, India, Myanmar, Nepal, Pakistan
	Garments – Clothing Accessories: Argentina, Brazil, China, India, Malaysia, Thailand, Vietnam
	Cattle: Bolivia, Brazil, Niger, Paraguay
	Sugarcane: Brazil, Dominican Republic
	Gold: Democratic Republic of the Congo, North Korea, Peru
	Carpets: India, Pakistan
	Coal: North Korea, Pakistan
	Fish: Ghana, Indonesia, Thailand, Taiwan, South Korea, China, Japan, Russia ¹⁰
	Rice: India, Myanmar
	Timber: Brazil, North Korea, Peru
	Brazil Nuts/Chestnuts: Bolivia
	Cocoa: Côte d'Ivoire, Ghana
	Diamonds: Angola
	Electronics – Laptops, Computers & Mobile Phones: China, Malaysia

Our Three-year Modern Slavery Roadmap

We developed a road map to guide our modern slavery risk management response over three years.

 Year 1 (FY 19/20) Framework	 Year 2 (FY 20/21) Monitoring	 Year 3 (FY 21/22) Effectiveness Review
Actions for Year 1	Potential Actions Year 2	Potential Actions Year 3
Working Group established	Completed onsite auditing of potentially highest-risk suppliers	Reconvene Working Group and brainstorming sessions
Gap analysis and action plan completed; Mapping of potential high-risk Tier 1 suppliers	Integration and closure of corrective actions	Complete onsite auditing of potentially highest-risk suppliers
Board approval and ELT buy in obtained	Modern Slavery provisions in supplier contracts for awareness and accountability	Engage Club Assist North America battery main supplier in on-site audit
Modern slavery risk framework / risk register updated	New Zealand Investment Engagement (AABS)	Incorporate Modern Slavery into the E-learning system, high level staff awareness Modern Slavery business impact
Supplier prioritisation and engagement completed; supplier training	Club Assist North America Inc re-engagement	Operations assessment and audit of Modern Slavery
Completed desk-top review of top 10 suppliers based on risk and spend	COVID Response	Modification of the "Whistle Blower Policy"
Consultation with external Modern Slavery expert to assess programmes		

Modern Slavery 2018-2019 lodged

CAPL's Year 1 Modern Slavery Statement was lodged with the Australian Border Force in early 2021 and was published on the online register portal on 23 April 2021. The report can be accessed [here](#).

2020/2021 Modern slavery risk management initiatives

A. Ongoing supplier due diligence through on-site Audits

In 2020, we conducted a supplier risk prioritisation and identified our potentially highest risk suppliers. Following a desk-top assessment in 2020, we commissioned 3rd party audits of our priority suppliers in South Korea to ground truth our desk-top findings. Three automotive battery suppliers participated in site audits.

B. Supplier Contracts

In CAPL's recent supplier contracts with major battery suppliers, we introduced Modern Slavery provisions in the agreement. This will provide accountability to suppliers to ensure that Modern Slavery principles are adhered to in relation to their factory workers in South Korea. This will increase awareness and constitute a step forward in ensuring that Modern Slavery is minimised and eventually eradicated.

C. Supplier engagement and closure of Corrective Action Plans

We developed our supplier engagement and communications strategy. We worked with suppliers to consolidate our corrective actions from the desktop assessment and on-site audits to inform our Year 2 actions plans for our priority suppliers.

D. New Zealand Investment (AABS)

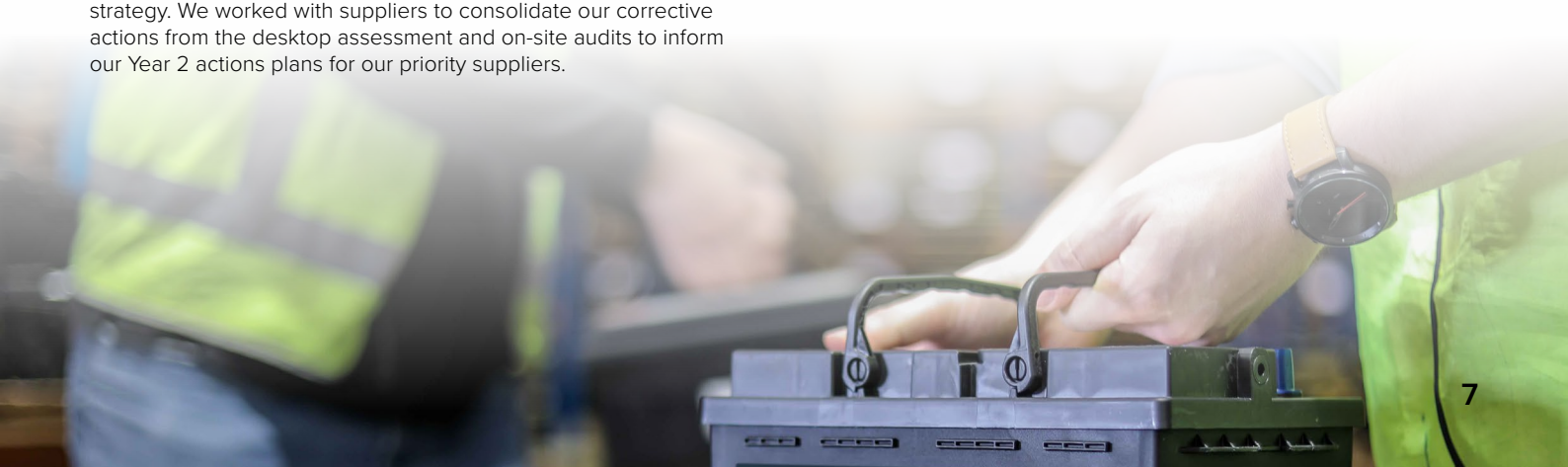
We developed performance standards and evaluation criteria for our potentially highest-risk New Zealand (NZ) contracts and suppliers, and for our NZ investments (AA Battery Service). A full SPEND analysis was undertaken to identify our highest risk suppliers in consideration of common suppliers with CAPL.

E. CANA Inc. (Club Assist North America)

Similar to AABS, CANA Inc. has adapted the 3 main suppliers of CAPL. CANA's main supplier has been audited through a desktop audit. The on-site audit is a target set for Year 3.

F. COVID Response

The COVID-19 pandemic has increased the vulnerability of our workers, particularly in the field. It was critical for CAPL to establish the safety protocols and framework in which we will safely operate. Though continuously improving, we have been successful in adapting to the unprecedented situation, in order to safeguard our team members and our customers.



On-site Audit

On-site auditing formed a major part of our Year 2 modern slavery risk management initiatives. Following a detailed desktop modern slavery risk assessment of our potentially highest risk suppliers, CAPL Board of Directors wanted to physically validate the desk-top results, with a more in-depth on-site audit of our three priority battery suppliers. The three suppliers are all located at the outskirts of South Korea, several kilometres from Seoul. Total size of factories would range from 85,000 square meters to 100,000 square meters, with total number of workers averaging 500 employees. The factories specialised in manufacturing automotive batteries. The general production processes are injection molding, pasting, cell assembly, formation, charging and packing.

In July 2020, we appointed Verisio to undertake social impact audits of our South Korean suppliers. Verisio is a global quality and compliance solutions provider offering factory audits, inspector management and quality consulting to retailers and their suppliers, manufacturing in Europe and Asia, with its head office in university city of Cambridge, UK. With expertise in auditing based on the Ethical Trade Initiative (ETI) Base Code, and customer-specific social compliance programs, Verisio's APSCA certified local auditors. Verisio auditors hold relevant professional qualifications as Lead Auditors for Social compliance auditing (SA8000) and quality (ISO9001).

Our three main battery suppliers were audited on 07-08 October, 27-28 October, 25-26 November 2020. The auditors spent two full days per supplier to go through documentation, talk to employees and also go around the facilities.

General procedure of audit and Verisio's integrity policy were explained and agreed by factory representatives. The management was very supportive and cooperative during the entire audit. They were transparent to discuss the factory situation.

The company's approach to an audit protocol was based on their standardised Ethical audit, that was further customised to focus on Modern Slavery. The company's standard audit protocol was

reviewed internally, in consultation with Verisio and our Australian advisors, SD Strategies.

The audit coverage was wider than the requirements of this statement, covering 13 areas including the 3 main pillars of Modern Slavery which are Governance/Due Diligence, Risk Management and Training/Reporting.

Corresponding action plans to address the non-compliance (NCs) and partial compliance (PCs) were documented. General working conditions and labour management systems were satisfactory. Each factory has its own code of ethics which includes human rights and modern slavery requirements. The factories had strong HR and a good system to control working hours. Working hours were monitored by HR on a daily basis and overtime did not exceed legal limits.

The main area of concern was risk management particularly in Supply Chain. One factory lacked supply chain management on modern slavery. Based on the audit result, the factory needs to map all its suppliers and introduce an effective system to evaluate performances of their respective supply chains.

In addition, the key points raised during the audits were as follows:

- High risk suppliers and location of commodity were not identified
- Supplier contract did not include Modern Slavery and human rights requirement
- Safety issues at the site (eg. blocked fire hydrant, blocked electrical control board, etc.)

However, the over-all conclusion of the audit was that the general working conditions and labour management system were satisfactory. The factories were certified on several quality systems such as ISO 9001/14001 and ISO 45001. As there was no critical issue found during the audit, an annual audit is recommended to follow through areas of improvements.

		Compliant	Not Applicable	Partial Compliance	Non-Compliance
1	Governance & Due Diligence	14	0	0	1
2	Risk Management	5	0	4	13
3	Employee Freedom	17	4	0	0
4	Freedom of Association & Collective Bargaining Rights	24	3	0	0
5	Working Conditions	41	0	1	3
6	Child Labour	28	14	0	0
7	Living Wage	54	6	0	0
8	Working Hours	20	3	1	0
9	Discrimination	9	0	0	0
10	Regular Employment	9	3	0	0
11	Harsh or Inhumane Treatment	12	0	0	0
12	Dormitory	0	21	0	0
13	Training & Reporting	10	0	4	1

All non-compliances were rectified within FY21

Supplier Contracts

In order to align with the goals of eradicating Modern Slavery practices within our supply chain, we needed to impose Modern Slavery compliance provisions in our supplier contracts.

One of the areas in which we communicate our human rights expectations and control the potential risk of modern slavery arising in our global supply chain is through our contracting process with our direct suppliers. It is also the intention of these provisions to hold the suppliers accountable for their own suppliers, which is essential CAPL's Tier 2 suppliers.

Any breach of provision will enable CAPL to terminate its relationship with the supplier. Our contracts are reviewed every 3 years. In FY25, we will continue to review contracts across other business arrangements, such as property, to streamline modern slavery provisions in standard contracts to ensure our management framework is consistent across the CAPL. We recognise the importance of building greater understanding of modern slavery risks and our requirements with the team members who are responsible for supplier relationships and oversight so that they are equipped to provide guidance to our partners to comply with our expectations.

As sample of the provision of the contract would be as follows:

23. MODERN SLAVERY LAWS
23.1 Sebang Global must and must ensure that each of its related companies ("Sebang Global Group Member") and each entity in its and its Sebang Global Group Members' supply chain that it or its Sebang Global Group Members have a direct or indirect relationship with ("Supply Chain Entity"), comply with all applicable modern slavery laws in force from time to time including those applicable under Australian and international legislation.
23.2 Sebang Global represents and warrants that:
(a) it has investigated its labour practices, to satisfy itself that there is no modern slavery used anywhere in its business or in the business of any Sebang Global Group Member or Supply Chain Entity; and
(b) to the best of its knowledge, Sebang Global, each Sebang Global Group Member and each Supply Chain Entity:
(i) has not been convicted of any offence involving modern slavery; and
(ii) has not been, and is not, the subject of any formal complaint, investigation, inquiry or enforcement proceedings by any person or regulatory body in connection with modern slavery.
23.3 Sebang Global must give Club Assist all information reasonably requested by Club Assist to report on, or comply with, any modern slavery laws in force from time to time, or any direction of a Governmental agency relating to modern slavery, promptly after a request from Club Assist to do so.

Integrating site audit findings with our supplier desktop modern slavery risk assessments

The findings from the on-site audits were reconciled and integrated with the desk-top risk-assessments A post-audit workshop was conducted with each supplier, supported by SD Strategies and relevant Club Assist representatives. The objective of the workshops was to prioritise findings and agree on corrective actions.

The majority of findings identified in the desktop risk assessments were echoed in the on-site audits. Site audits captured non-compliances relating more specifically to worker health and safety. Our focus in the latter half of this reporting period was on closing off the non-compliances and documenting areas for improvement for Year 3. All three suppliers completed the required corrective actions by 30 June 2021. The results are detailed in the summary table below:

Integrated Statistics for On-site Audit & Desktop Assessment

	On-site Premises	Governance & Due Diligence	Risk Management	Training & Reporting	Training & Reporting	Completed	Completion %	On-Track	At Risk
Supplier A	1	2	2	4	9	9	100%	0	0
Supplier B	2	3	3	2	10	10	100%	0	0
Supplier C	1	2	2	2	7	7	100%	0	0

New Zealand Investment engagement

The results of the gap analysis during Year 1 have been considered in the development of an organisation-wide modern slavery action plan linked to the mandatory reporting requirements set out in the legislation. AABS operational risks and gaps were assessed from across the organisation through a facilitated modern slavery gap analysis process. The plan included actions to be addressed by the AABS's governance, legal and risk, HR and training, procurement and logistics, communications and operations teams.

There was a need for AABS to do a SPEND analysis, together with CAPL representatives. Based on critical SPEND and procurement categories, potentially high-risk suppliers have been identified. The results of the SPEND analysis demonstrated that majority of their SPEND is with the same suppliers of CAPL. Therefore, any initiative undertaken by the suppliers will significantly cover AABS' risk in

Modern Slavery. It should be noted that battery suppliers were assessed as part of CAPL's 2020 supplier due diligence process.

Furthermore, AABS has brought Modern Slavery to the agenda in the Board meeting, in order to secure management's buy-in. AABS took initial steps towards understanding the requirements of compliance to Modern Slavery legislation and flow on benefits from CAPL's programme.

As business, CAPL is incorporating its initiatives with AABS as it seeks to continue to eradicate Modern Slavery in business. Leveraging on works already undertaken by CAPL and CANA, the implementation in AABS has been more efficient over the past year. This awareness allowed AABS to initially look at operational and supply chains risks.

Responding to the COVID-19 global pandemic

We understand that the global pandemic has and will place additional pressure and risk into our supply chain operations globally and locally.

Utilising our Product Supply Business Continuity Plan, and through the formation of a cross-business Pandemic Response Team in March 2020, we have actively tried to identify, plan, and mitigate the people and product supply chain risk that the COVID-19 outbreak has presented to Club Assist and our customer base.

Identifying and mitigating increased Supply Chain risks

1. Supplier communication and collaboration is key

The Club Assist supply chain teams in both Asia Pacific and North America quickly responded to the pandemic challenges by ensuring our regular supplier meetings became more detailed, more open, and more risk scenario focused. This included agreeing swift notification of any manufacturing impacts (for example raw material supply, workforce shortages, and local restrictions) and pro-active communication of any local changes to employee requirements (for example personal protective equipment, shift patterns, working time requirements, accommodation changes). The intention was for Club Assist to maintain confidence and due diligence over any impacts to the workforce that would have been implemented as part of the supplier's pandemic risk response.

2. Sharing learning and best practice risk management

With the pandemic accelerating at different rates across the globe and different government restrictions and social expectations of service providers, Club Assist teams across the United States of America, Canada, Australia and New Zealand regularly shared their experiences and learning to anticipate and plan for previously unseen risks.

Safeguarding our teams in Australia

Across our teams in every state and territory in Australia we implemented the following:

1. State/Territory specific COVID Safe Plans

Club Assist developed, communicated, and implemented COVID Safe Plans to meet all the requirements set out by the local government as a minimum, while also providing a consistent risk prevention profile for our people. These plans were developed to record:

- Our actions to help prevent the introduction of coronavirus (COVID-19) in our workplaces;
- The level of face-covering or personal protective equipment (PPE) required for our workforce; and
- How we will prepare for, and respond to, a suspected or confirmed case of coronavirus (COVID-19) in our workplace.

2. Risk profiling and safety measures by role

Aligned to the COVID Safe Plans, Club Assist assessed the increased risks from the pandemic to our operations within three classification or roles – Direct service & delivery, Warehousing, and Office. Personal protective equipment and other specific risk mitigation measures were then defined and communicated by role type.



Year 3

1. Reconvene the Modern Slavery Steering Committee

During Year 1, CAPL formed a Steering Committee to initiate the modern slavery Programme in the organisation. This included representatives from North America. We will be reconvening to reengage both AABS and CANA on the plans for Year 3, in collaboration with our consultant SD Strategies.

2. Physical Audit of Priority (Focus on Tier 2 Suppliers)

We will work with our priority Tier 1 suppliers to identify and engage our potentially risk Tier 2 suppliers. In Year 3, we will undertake on-site audits again using Verisio's experienced and local auditors to undergo deep-dives.

3. Physical Audit – East Penn

CAPL has proposed an audit with East Penn on Modern Slavery. This has been discussed and will be an action from CANA Inc.

4. Internal Training

Our Organisational Development Department will be launching a Modern Slavery Training Program for all staff. The training program will enhance awareness about modern slavery across all sections of our business and ensure that we continue to effectively assess and address modern slavery risks in our operations and supply chain. The proposed content of the modules will be as follows:

- What is Modern Slavery?
- Modern Slavery in the Workplace?
- Business Relevance?

5. Operations Focus – contractors

Modern Slavery focus is not just on the Supply Chain, but also Operations. This year, after conducting the internal training the business will have a better understanding and awareness of modern slavery business relevance. Equipped with this awareness, we are able to look into our own operations and see risk opportunities in our DCs, field contracted workers, cleaning contractors, third party drivers and others. An internal audit will be conducted to see if there are areas of concern.

6. Whistle Blower Policy

While 65% of the companies stated that they have a whistleblowing helpline, only 24 companies stated it was available for members of their supply chain. As CAPL, we will be considering extending helplines across operations and supply chain, given that this is where modern slavery related issues are most likely to occur. It is important that the policy is clear and also easily accessible to any individual who wishes to provide sensitive information. The framework and programme need to be deemed have the safety and wellbeing of the individual protected.

Plans beyond Year 3: The Way Forward

A. Effectiveness review:

We will continue to review the effectiveness of actions/programmes the past 3 years, to identify, assess and address modern slavery risks and incorporate outcomes-focused performance indicators into the review processes. As we assess its effectiveness and gaps, we will use these identified gaps in order to plan ahead for the coming years.

B. Capability building & continuous learning

We will continue to deliver modern slavery risk management training to staff, contractors and suppliers. We will continue to promote awareness across the organisation of modern slavery fundamentals. Awareness and continuous learning would be the only way to eradicate the existence of Modern Slavery at the workplace.

C. Expansion of supplier base:

We will prepare a detailed map of our supply chain and document our high-risk categories and geographic locations. We will revisit our supplier base and continue to expand coverage from direct materials to indirect materials/services.

D. Strengthening of our policies and frameworks:

We have existing and formulated new policies, not just in reference to Modern Slavery compliance but also to ensure good governance withing Club Assist. We intend to continue to formulate, revisit and strengthen this in the coming years. Policies such as the following will be reviewed regularly:

1. Risk Register
2. Procurement Policy & Supplier Code of Ethics

E. Supplier Partnerships and annual audits:

While we understand supply chain audits do not eliminate modern slavery risks, they are, however, one of the tools we use to help identify indicators of modern slavery that prompt further investigations. We intend to continue with our on-site audits yearly and work with our suppliers to ensure that there is minimal or zero risk of Modern Slavery. We will continue to review and improve our supplier due diligence, risk management, training and supplier engagement systems and ensure modern slavery risk management processes are mainstreamed into business operations.



Company Directory

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