



## Modern Slavery Statement 2024

### 1 Introduction

This modern slavery statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) in respect of the actions taken by Autoleague to assess and address modern slavery risks for the reporting period ending 30 June 2024.

This Statement covers the following reporting entities of Autoleague:

- Swift Holdings Investments Pty Ltd (ACN 655 356 424);
- AL Berwick Pty Ltd (ACN 604 272 086);
- AL Midland Pty Ltd (ACN 636 829 742);
- AL Morley Pty Ltd (ACN 636 111 209);
- AL Melville Pty Ltd (ACN 636 122 046);
- AL Wanneroo Pty Ltd (ACN 636 112 108);
- AL Maddington Pty Ltd (ACN 636 111 996);
- Midland 2015 Pty Ltd (ACN 606 139 146);
- Wirraway Motor Company Pty Ltd (ACN 155 882 081);
- Airport Motor Group Pty Ltd (ACN 113 244 492);
- Prosser 2015 Pty Ltd (ACN 606 139 164);
- Berwick Motor Group Pty Ltd (ACN 067 078 371);
- Autoleague Holdings Pty Ltd (ACN 658 604 865);
- Autoleague Pty Ltd (ACN 606 360 570);
- Buick Holdings Pty Ltd (ACN 094 424 674);
- Canno Motors Pty Ltd (ACN 633 539 367);
- Maddington Motors Pty Ltd (ACN 627 827 909);
- AL Essendon Pty Ltd (ACN 627 574 958); and
- CarPlace Automotive Pty Ltd (ACN 657 226 081),

(collectively '**Autoleague**').

### 2 Autoleague's Structure and Operations

The name 'Autoleague' represents the elements of Autonomy, Competition and Diversity which are instrumental factors in Autoleague's growth and success. The Autoleague group consists of a number of proprietary companies and is headed by its parent company, Swift Holdings Investments Pty Ltd (ACN 655 356 424) (**Swift**).

Autoleague is a leading organisation in the automotive industry with approximately 1833 employees in Australia.

Autoleague's main operations are its car dealerships with 35 dealerships in Western Australia, 15 in Victoria and 1 in Queensland. In addition to selling new and used motor vehicles, the dealerships provide servicing, parts and finance, insurance and warranty products to its customers.

Autoleague's automotive operations are complimented by its digital retail platform, mymoto, its software development arm, Autoleague X, and its ride share and vehicle subscription business, Karmo.

### **3 Autoleague's Supply Chain**

Autoleague acknowledges that the products and services (including labour) of its supply chain (in Australia and overseas) contributes towards Autoleague's own products and services.

Autoleague considers that risks of modern slavery in its operations and supply chain primarily relate to the manufacture of motor vehicles and includes raw materials and automotive parts overseas, which are imported to Australia for distribution.

Autoleague's overseas supply chain includes motor vehicles manufactured in various locations across the globe including Japan, China, USA, South Korea, India, Thailand, Germany, Iran, Slovakia and Mexico. These locations are not considered to have a high prevalence of modern slavery. In addition, Japan and Germany are classified as low risk jurisdictions in the 2023 Global Slavery Index (<https://www.walkfree.org/global-slavery-index/>).

Autoleague also recognises that there may be risks associated with a lack of visibility further down the supply chain, along with risks associated with locally sourced goods and services. However, Autoleague notes that Australia is classified as a low risk jurisdiction according to the 2023 Global Slavery Index.

Autoleague's supply chain in Australia comprises the following goods and services from suppliers:

- consumables i.e. fuel, oil and lubricants;
- logistics and transport;
- car washing and detail services;
- cleaning;
- waste disposal;
- professional services;
- information technology; and
- office supplies.

Autoleague's core suppliers include GPC Group (Repco, Napa), FUCHS, Ampol and Tyre Connect. Autoleague's arrangements with its suppliers are mostly long term and

stable.

#### 4 **Modern Slavery Risks in Autoleague's Operations and Supply Chains**

The risk of modern slavery practices refers to Autoleague's potential to cause, contribute to or be directly linked to modern slavery through its operations and supply chains.

In respect of new motor vehicles supplied to Autoleague, some of the manufacturers are based in countries that have been reported by international and non-government organisations as having a medium-high prevalence of modern slavery, labour rights violations and other human rights violations. For example, India and Iran are ranked 6<sup>th</sup> and 8<sup>th</sup> on the 2023 Global Slavery Index for the Asia and Pacific region.

During the reporting period Autoleague established an operation in Colombo, Sri Lanka, to support its Australian businesses by offering a range of administrative and developer services. The Colombo business operates as an offshore extension of the Australian operations, enabling cost efficiency, scalability, and access to a skilled talent pool. Sri Lanka is ranked 11<sup>th</sup> on the 2023 Global Slavery Index for the Asia and Pacific region, with an estimated 6.5% prevalence of modern slavery within the population.

Autoleague continues to outsource foreign temporary skilled workers to recruitment firms in the Philippines. There is a risk that the recruitment strategies used by Autoleague's service providers utilise workers from disadvantaged communities.

#### 5 **Assessing and Addressing Modern Slavery Risks**

##### 5.1 *Policies and Procedures*

As the automotive industry in Australia continues to evolve, driven by advancements in technology, new ownership models and changing regulations, Autoleague are faced with a new generation of employees and consumers who demand a higher level of transparency, ethical behaviour and effective communication. Autoleague's policies and procedures are living documents and they are updated to ensure they remain relevant and assist in identifying illegal and unethical behaviour and modern slavery risks. Autoleague's policies and procedures relevant to assessing and addressing modern slavery risks are consistent with those described in paragraph 5.1 of this Statement and Autoleague's Modern Slavery Statement 2023.

Autoleague's Code of Conduct (**Code**) is a comprehensive guide that clearly outlines the expected behaviours that align with Autoleague's values

of collaboration, diversity, driven, respect and integrity. Although the Code focusses on the responsibilities of Autoleague's employees and stakeholders, Autoleague's suppliers and contractors are required to comply with the Code in providing goods or services to Autoleague.

In addition to its Code, Autoleague has an Equal Opportunity, Discrimination Bullying and Harassment Policy and a Grievance and Investigation Policy. These policies apply to all employees, contractors and agents.

Autoleague's Whistleblower Policy also enables individuals, including employees (current and former) and their families, contractors and suppliers to report instances or allegations of illegal, unethical or unacceptable conduct within Autoleague's operations or supply chains.

Any claims of modern slavery are required to be reported to Autoleague's Disclosure Officer (which is the Head of People and Culture) or the relevant external government body such as the Australian Federal Police, Australian Securities & Investments Commission or Australian Taxation Office. Whistleblowers can provide their name and contact details or report anonymously. A dedicated confidential email address [whistleblower@autoleague.com.au](mailto:whistleblower@autoleague.com.au) has been established for reporting purposes. There were no reports of modern slavery during the reporting period.

Autoleague's Managing Director and CEO are informed of any reports of breaches of the Code, any modern slavery issues and any investigation outcome of alleged contraventions under its Whistleblower Policy.

Autoleague and its reporting entities identified in this Statement in section 1, share the same policies, procedures and processes and in many cases have shared suppliers as all these entities group operate in the automotive industry.

## 5.2 *Overseas operations*

Autoleague works with responsible partners and engages local legal counsel in Sri Lanka to ensure compliance with applicable labour laws and international standards. Autoleague is committed to upholding ethical labour practices and ensuring its engagement of overseas workers is free from modern slavery practices.

### 5.3 *Temporary Foreign Skilled Workers*

Autoleague continues to support Australia's obligation under article 11(1) of the International Convention on Economic, Social and Cultural Rights 1966 that people should have the right to adequate housing. Due to the risk of modern slavery identified in the utilisation of temporary foreign skilled workers referred to in section 4 above, Autoleague continues to implement the measures outlined in paragraph 5.3 of this Statement and Autoleague's Modern Slavery Statement 2023.

Autoleague's Human Resources Adviser directly sources suitable short stay accommodation for the temporary foreign skilled workers in conjunction with the General Manager of the relevant dealerships. Autoleague reviews the accommodation prior to placing the worker in the accommodation. Short term accommodation is arranged for these workers for approximately 4-6 weeks or until permanent housing is found.

Autoleague assists the temporary foreign skilled workers to locate long term accommodation by searching for rentals online, meeting with property managers, attending or arranging property viewings, providing references and assisting with lease agreements.

Autoleague has a list of preferred recruiters who are vetted and required to adhere to the Code. Visas for foreign skilled workers for Autoleague and its reported entities are handled by an independent migration agent.

## **6 Assessing the Effectiveness of Actions Taken**

Swift and the entities which it owns and controls together with the reporting entities (listed in section 1) have quarterly business leaders meetings to regularly review actions taken to address modern slavery in its supply chain and operations. These meetings are attended by all dealership principals and key management charged with responsibility over modern slavery. During these meetings, any reports of modern slavery are discussed together with case study examples and any lessons learned.

Autoleague's risk committee also assesses the actions taken by Autoleague to address modern slavery. The risk committee consists of representatives from Autoleague's Operations, Accounting, Information Technology, Human Resources and Legal teams. This committee meets regularly during the reporting period to discuss modern slavery risks and to propose amendments to Autoleague's policies and procedures to capture any current trends in cases of modern slavery.

Other methods Autoleague utilises to assess the effectiveness of its actions, is by auditing suppliers, particularly new suppliers. With regard to recruitment, Autoleague's Human Resources team handles the majority of local recruitment. On occasion Autoleague does use the services of 2 reputable recruitment firms which have been vetted by Autoleague.

In regard to overseas recruitment, Autoleague's Human Resources Advisor continues to have follow-up meetings with temporary foreign skilled workers shortly after their arrival into Australia. The purpose of this meeting is to check on the worker's health and wellbeing, their current living arrangements and to provide the worker with a contact point to raise any concerns.

Autoleague continues to be committed to assessing the effectiveness of its actions taken to combat modern slavery risks in its operations and supply chains.

## **7 Consultation**

In preparing this Statement, Swift, Autoleague's parent company, consulted with the representatives of the entities it owns and controls. This consultation was facilitated by a director of Swift who is also a director of each entity which Swift owns and controls and the reporting entities listed in section 1. The director is aware that this Statement was being prepared and was provided with the opportunity to participate in its preparation.

Consultation on the preparation of this Statement was also undertaken with the following department heads of Autoleague – Chief Financial Officer, Head of Digital Strategy, Head of IT, Head of People & Culture, Head of Property, Head of Corporate Business, Head of Service, Head of Parts, Head of Aftercare, Head of Retail Finance & Insurance, Group Business Intelligence Manager and Group Financial Controller.

Further, Swift and the reporting entities set out in section 1 of this Statement recognise the need for a collaborative approach to address the risk of modern slavery in its operations and supply chains and adopt the same policies and procedures of the Autoleague group.

## **8 Approval**

This Statement for each of the reporting entities set out in section 1 of this Statement, was approved by the Board of Swift Holdings Investments Pty Ltd (ACN 655 356 424) as the parent entity.

This Statement is signed by Dan Kawai in his role as Director of Swift Holdings Investments Pty Ltd (ACN 655 356 424) on 27 December 2024.



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Dan Kawai  
Director  
27 December 2024