



MODERN SLAVERY STATEMENT

PACIFIC REGION

avis budget group

CONTENTS

- 3** Introduction
- 4** Organisation, Operations, Structure & Supply Chains
- 9** Risks of Modern Slavery Practices in our Operations & Supply Chain
- 12** Actions taken to Assess & Address Identified Modern Slavery Risks
- 17** Assessing the Effectiveness of our Actions
- 18** Finalisation

INTRODUCTION

This statement, pursuant to the Modern Slavery Act 2018 (Cth), reports on the risks of modern slavery in Avis Budget Group's operations and supply chains, and actions taken to address those risks during Avis Budget Group's financial year ended 31 December 2022.

Avis Budget Group Pacific Operations are a subsidiary of the Avis Budget Group, Inc. which is listed on the NASDAQ, New York. This statement covers the Avis Budget Group entities set out in section 2 of this statement.

Avis Budget Group is committed to working with its supply chain partners to ensure its business operates lawfully and ethically. We expect our suppliers and business partners to commit to ethical standards of conduct in daily business, including by ensuring that workers are paid fair wages, treated with dignity, and provided with a safe working environment.

Further information on the Avis Budget Group's global business, strategy, offerings and approach to sustainability is available at www.avisbudgetgroup.com.

Avis Budget Group (US) also reports its economic, social and environmental performance annually in accordance with the Global Reporting Initiative (GRI) Standard as well as the e Sustainable Accounting Standards Board (SASB) Standard.

ORGANISATION

200,000
Connected
Cars

9.1 Billion
Annual
Revenue
Worldwide

The Avis Budget Group is a frontrunner in mobility solutions such as passenger and commercial vehicle hire as well as car sharing worldwide.

In Pacific, Avis Budget Group is headquartered in Sydney, Australia and operates through three separate brands and associated entities in Australia, New Zealand and Singapore:

11,000
Locations

600,000
Vehicles



180
Countries

1 Million
Zipcar
Members
Worldwide

In the Pacific, the Avis Budget Group employs over 1700 people and operates out of more than 180 locations comprised of agency operators, franchises and our own premises, across the main brands of Avis, Budget and Apex.

ORGANISATION | OUR OPERATIONS

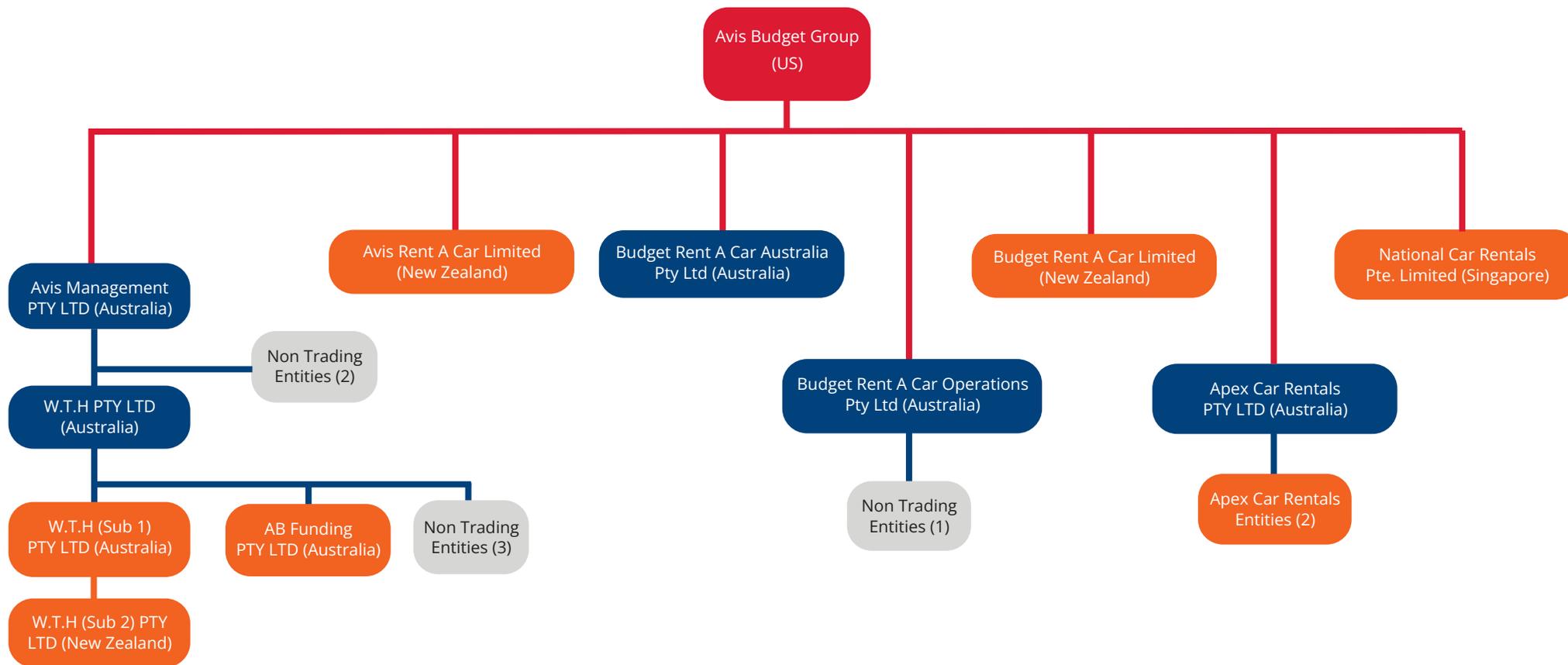
In preparing this statement we have acted collaboratively and in consultation with wholly owned subsidiaries of the Avis Budget Group (US) in the Pacific. As the entities within the Avis Budget Group in the Pacific use similar policies and processes, operate in the same sector with many shared suppliers and have centralised reporting lines, we will provide a consolidated description of the actions our Group are taking to address modern slavery risks.

This statement is a joint statement made by Avis Management Pty Ltd (ABN 50 001 889 336), W. T. H. Pty Ltd (ABN 15 000 165 855), Budget Rent A Car Australia Pty Ltd (ABN 89 007 348 021), Budget Rent A Car Operations Pty Ltd (ABN 55 054 583 925) and Apex Car Rentals Pty Ltd (ABN 65 159 894 970) (together "**Avis Budget Group**").

The following related Australian entities are also part of the Avis Budget Group and are covered by this statement: W. T. H. (Sub 1) Pty Ltd (ABN 86 070 810 703), AB Funding Pty Ltd (ABN 95 125 104 654) and AU Holdco Pty Limited (Australia) (ABN 57 159 895 744).

The following related overseas entities are also covered by this statement: Avis Rent A Car Limited (New Zealand) (NZBN 9429040195810), W. T. H. (Sub 2) Pty Ltd (NZBN 1172297), Budget Rent A Car Limited (New Zealand) (NZBN 9429039997920), Apex Car Rentals (New Zealand) (NZBN 9429030667440) and National Car Rentals (Private) Ltd (Singapore) (Company number: 196100157E).

ORGANISATIONAL STRUCTURE



Covered by Global Modern Slavery Statement	Entities covered by the joint statement under Modern Slavery Act 2018 (Cth)	Entities making a joint statement under Modern Slavery Act 2018 (Cth)

ORGANISATION | OUR SUPPLIERS

Suppliers are valuable partners for Avis Budget Group. Avis Budget Group works closely with its suppliers to ensure a socially, environmentally, and economically responsible value chain.

Avis Budget Group purchases various goods and services and has a supply base of more than 5,000 direct suppliers in the Pacific. Excluding vehicles, our total spend in the Pacific was approximately AU\$200m. In the Pacific, about 50% of our spend in 2022 was purchased from less than 50 suppliers.

Suppliers include Fleet related vendors (vehicle and parts manufacturers, vehicle repairs), IT related vendors (telecom/technology) and non-Fleet vendors (Professional Services, Uniforms, Fuels, Call Centre, and various other categories). Avis Budget Group acknowledges that many suppliers themselves rely on their own supply chain.

ORGANISATION | OUR FRANCHISEES

Besides its suppliers, the Avis Budget Group relies on a network of Franchisees to complement its own network of corporate-owned locations.

Whilst there are sourcing activities that covers the Franchisee network, Franchisees are mostly self-reliant in sourcing their needs for Goods & Services. The Avis Budget Group requires Franchisees to ensure they operate within the framework of, and in accordance with, the Avis Budget Group policies. The Avis Budget Group has an extensive contractual framework and due diligence systems in place to monitor and audit Franchisees' compliance with Avis Budget Group policies, including our policies relating to modern slavery.

The Avis Budget Group is committed to supporting local economic development where we operate, through local sourcing where feasible, as well as training and recruitment of local people.

RISKS OF MODERN SLAVERY PRACTISES IN OUR OPERATIONS AND SUPPLY CHAIN

The Avis Budget Group work to proactively identify potential modern slavery and broader human rights risk areas across our operations and supply chains.

We recognise that the level of modern slavery risk in our operations and supply chains is influenced by a range of factors, including geographic, sector and product specific factors, and we incorporate these considerations into our risk assessment processes. We also understand that our modern slavery risk profile is continually evolving, as we constantly alter our Network, Operations, and Supply Chain.

RISKS OF MODERN SLAVERY PRACTISES IN OUR OPERATIONS AND SUPPLY CHAIN

Potential modern slavery risks in our operations

The risk that, without appropriate due diligence, contractual framework and monitoring processes, we may be directly linked or contribute to modern slavery involving our indirect workforce include:

LABOUR HIRE

While we have assessed the risk of modern slavery involving our direct employees as low, we recognise contingent workers, such as those provided by third party labour hire may be more vulnerable to modern slavery, including where these workers are lower-skilled and/or temporary or migrant workers. This may include workers in areas such as on-premises cleaning, car relocation and detailing.

Specific and dedicated due diligence and contractual framework were defined for Labour suppliers. The Avis Budget Group is continuing the review of its existing labour providers and the implementation of specific contractual framework.

OUTSOURCED CALL CENTRES

The Avis Budget Group maintains Call Centres in several countries both in-house and outsourced, including outside of Australia and New Zealand. This has been identified as carrying medium to high risk of modern slavery due to the locations of the supply chains. The outsourcing partner used by the Avis Budget Group is a reputable Australian organisation committed to fighting Modern Slavery practices. Our partner falls under the Modern Slavery Act 2018 (Cth) and publish its own Modern Slavery Statement on an annual basis which highlight the extend of its actions.

The Avis Budget Group also ensures regular visits to the call centre by dedicated personnel and engaged with its partner to understand their internal check and balances relating to Modern Slavery prevention, human right protections and anti-bribery practices.

RISKS OF MODERN SLAVERY PRACTISES IN OUR OPERATIONS AND SUPPLY CHAIN

Potential modern slavery risks in our supply chain

The risk that, without appropriate due diligence, contractual framework and monitoring processes, we may be directly linked or contribute to modern slavery involving our supply chain include:

UNIFORMS

The Avis Budget Group sources uniforms for its Australia and New Zealand workforce through a preferred Australian provider. This has been identified as carrying high risks of modern slavery due to the locations of the associated Supply Chains. In addition, the clothing industry has received a significant amount of negative publicity in regard to poor labour conditions and modern slavery practices.

A change in Uniforms provider has offered us with the opportunity to partner with an organisation that is committed to Ethical behaviours and to fighting Modern Slavery. In addition to specific Policies in place, our partner works exclusively with suppliers that can demonstrate adherence to Ethical Standards through a certification such as SMETA. This requirement is extended to their Tier 3 suppliers with a view to go to Tier 4 suppliers in the near future.

Modern slavery risks and labour rights issues related to our employees

We consider our direct workforce to be at negligible risk of modern slavery, thanks to our existing processes and controls. As a Group, adherence with employment law and regulations forms part of our DNA and we have no tolerance for non-compliance.

Our employees are directly engaged pursuant to employment agreements, made under the provisions of Australian or relevant employment legislation and are supported by a robust policy framework which aims to ensure a safe, healthy and fair working environment. We also recognise the rights of our employees to freedom of association and collective bargaining, with or without third party involvement. Details of our policies can be found in section 4 of this statement.

ACTIONS TAKEN TO ASSESS AND ADDRESS IDENTIFIED MODERN SLAVERY RISKS

We seek to proactively assess and address modern slavery risks in our operations and supply chains. Importantly, we also integrate our response to modern slavery into our broader work to respect human rights.

The Avis Budget Group is committed to making the United Nations Global Compact (UNGC) and its principles, which include commitments to human rights and labour rights, part of the company's strategy, culture, and day-to-day operations. As one of the leading providers of mobility solutions worldwide, Avis Budget Group plays an important role in supporting the Sustainable Development Goals. Our corporate policies incorporate the UNGC Ten Principles, and reflect the concepts of fairness, honesty, and respect for people and the environment in our business actions.

Our actions to assess and address modern slavery risks in our operations and supply chains are based on five key elements that are supported by a governance framework:

- Policies
- Training
- Risk Assessment and Due Diligence
- Remediation
- Continuous Improvement



The following sections outline our governance framework and explain our work across each of these five elements areas. In 2022, due to challenges in identifying and onboarding key resources, we were unable to fully deliver our planned modern slavery continuous improvement initiatives. We however made progress in most areas and will strive to continue in 2023 (refer to section 6 of this statement).

ACTIONS TAKEN TO ASSESS AND ADDRESS IDENTIFIED MODERN SLAVERY RISKS

GOVERNANCE

Our commitment to preventing modern slavery is grounded in a robust governance framework that provides a clear structure for accountability. The Pacific Legal function is responsible for developing and implementing the Group's Modern Slavery program and the wider Business Integrity and Compliance framework. The team reports to the Pacific Managing Director, who oversees the program's progress. The Pacific Legal function's mandate is to ensure that the Avis Budget Group meets its responsibilities to prevent modern slavery and other human rights risks.

To address modern slavery and other human rights risks, accountability is shared across different business areas of the organization. Implementing actions to address these risks is a cross-functional effort that involves everyone in the company. A shared responsibility means that every employee has a role to play in ensuring the Avis Budget Group is a responsible and ethical company. The Group's commitment to tackling modern slavery is evident in its broader business practices, which reflect its core values of integrity and transparency.

Looking ahead, the Avis Budget Group has set a goal to implement an ESG (Environmental, Social, and Governance) governance framework in 2023. This framework will prioritize business ethics, with a specific focus on modern slavery prevention. By formalizing its commitment to preventing modern slavery in its governance framework, the Avis Budget Group demonstrates its dedication to addressing this issue. The framework will serve as a tool to promote transparency, accountability, and continuous improvement. As a company that values ethical behaviour and social responsibility, the Avis Budget Group is committed to doing its part to combat modern slavery.

POLICIES

The Avis Budget Group is dedicated to upholding numerous global policies that promote ethical and legally compliant business practices, as well as mitigate modern slavery risks throughout our supply chain. These policies serve as evidence of our commitment to preventing human rights violations such as modern forms of slavery within our business and supply chain. In the table below, we outline the key policies that are relevant to modern slavery and how they are implemented across our entire organisation.

We are committed to constantly improving and refining these policies to ensure that they remain effective. For instance, during the reporting period, we updated our third-party Standard of Conduct to ensure that it aligns with our commitment to preventing modern slavery. Additionally, we strengthened our management of modern slavery risks by integrating bilateral modern slavery compliance clauses into our precedent contracts. These clauses require suppliers, including sub-contractors, to assess and address modern slavery risks within their operations and supply chains.

Our efforts to prevent modern slavery are ongoing, and we are continuously looking for ways to improve our policies and practices. We recognise that the fight against modern slavery requires a long-term and concerted effort, and we are committed to doing our part to combat this issue. By continuously improving our policies and practices, we aim to set an example of ethical and socially responsible business conduct for the rest of the industry to follow.

POLICY	PURPOSE	SCOPE
CODE OF CONDUCT	<p>The purpose of the Code of Conduct is to promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; to promote full, fair, accurate, timely and understandable disclosure in periodic reports required to be filed by the company; and to promote compliance with all applicable rules and regulations that apply to the company and its officers and directors. The Code of Conduct has been translated into 14 languages.</p>	<p>The Code of conduct is publicly available on our Corporate website and is published on internal communication channels.</p> <p>All of our employees are required to complete our Code of Conduct learning module and to acknowledge related policies, including those pertaining to ethics and integrity and anti-bribery. Managers also complete the "Receiving and Escalating Concerns" module. Additionally, we conduct awareness programs to support a "See Something, Say Something" culture across our organization.</p>
HUMAN RIGHTS POLICY STATEMENT	<p>Guided by our Human Rights Policy Statement, we strive to conduct our business in a manner consistent with the UN Guiding Principles on Business and Human Rights and the International Labour Organisation's Fundamental Conventions. Central to our policy statement is the belief that child labour, human trafficking or other illegal, abusive, or forced labour practices have no place within our operations or our supply chains anywhere in the world. We focus on creating a culture and business environment based on transparency, inclusion, mutual respect, responsibility, and understanding.</p>	<p>To support compliance with the human rights standards set forth in our Third-Party Standards of Conduct, we encourage our partners and suppliers to periodically conduct self-evaluations to ensure that they, along with their subcontractors, complying with our human rights standards.</p>
WHISTLE-BLOWER POLICY & INTEGRITY HOTLINE	<p>Outlines the standards and procedures by which Avis Budget Group's employees should report instances of non-ethical behaviours.</p> <p>Our Integrity Hotline is available 24/7 and is a completely confidential channel for reporting serious concerns and complaints. Employees can reach the Integrity Hotline through dedicated phone lines or on the web. We maintain a non-retaliation policy that prohibits threats of retaliation or other discrimination directly related to any report made by an employee. All reported</p>	<p>Outlines the standards and procedures by which Avis Budget Group's employees should report instances of non-ethical behaviours.</p> <p>Our Integrity Hotline is available 24/7 and is a completely confidential channel for reporting serious concerns and complaints. Employees can reach the Integrity Hotline through dedicated phone lines or on the web. We maintain a non-retaliation policy that prohibits threats of retaliation or other discrimination directly related to any report made by an employee. All reported</p>
THIRD PARTY STANDARDS OF CONDUCT	<p>We recognize that our business has an impact on people, the communities where we operate, and the environment.</p> <p>Fostering sustainable relationships with our business partners, agents, consultants, suppliers, and other third parties is important to our business success. It is part of our standard business practices to select reliable and trustworthy partners as set forth by our Third-Party Standards of Conduct.</p> <p>While we cannot control all the activities and ultimate compliance of our business partners as they are independent entities, we aim to conduct appropriate diligence including research and analysis of a company or organization in the selection process to reduce risk and comply with the applicable laws. Our approach is to offer risk-based screening of our business partners to gauge their ability to comply with our Third-Party Standards of Conduct, as well as with applicable laws on corruption and bribery, competition and anti-trust, conflicts of interest, data privacy, and fraud.</p>	<p>The Third-Party standards of conduct is published on our corporate website, is referenced in our Purchasing Terms & Conditions and is included as an integral part to any Supply Contract.</p>

ACTIONS TAKEN TO ASSESS AND ADDRESS IDENTIFIED MODERN SLAVERY RISKS

TRAINING

In the Pacific, the Avis Budget Group has introduced a specific Modern Slavery Policy which outlines our approach to identifying and responding to risks of modern slavery practices within our supply chains and operations. All of Avis Budget Group's personnel, suppliers and business partners must read, understand, and comply with this policy.

Since introduction of a specific Modern Slavery Compliance Training in 2021, 80% of our workforce have completed it. This includes 100% of Avis Budget Group's Pacific Senior Leadership Team. This training is now one of the mandatory trainings for new employee as part of their induction process.

RISK ASSESMENT & DUE DILIGENCE

The Avis Budget group conducts Ethical Due Diligence prior to engaging with 3rd parties. The aim of this review is to consider the perceived initial risk associated with a number of factors. The main factors considered are the types of Industry, the associated Supply Chain locations, as well as the size and complexity of the engagement.

Specific and additional due diligence steps will be taken for the partners that fall into the higher risk profiles, ranging from specific questionnaire to specific contractual requirements for Supply Chain certification to recognised ethical standards (e.g. SMETA or Bsci).

ACTIONS TAKEN TO ASSESS AND ADDRESS IDENTIFIED MODERN SLAVERY RISKS

REMEDIATION

We have implemented procedures and systems for employees and external individuals to report any concerns regarding unethical or illegal behaviour, including cases related to modern slavery. Multiple channels are available for reporting unethical conduct, such as speaking with their supervisor or contract manager, utilizing a dedicated email address, phone line, or online portal as outlined in our Employee Code of Conduct and 3rd Party Standard of Conduct. Reports submitted through these channels are treated confidentially and with respect for the complainant's protection.

To ensure awareness of our Whistleblower program, mandatory training courses, regular employee communications, and the Employee Code of Conduct are utilized. The Code of Conduct is also publicly accessible on our Corporate website and provides instructions on how to file a report. Additionally, our 3rd Party Standard of Conduct specifies the reporting process for suppliers and external parties.

In 2022, there were no reported incidents concerning modern slavery. However, we acknowledge that the absence of complaints does not necessarily indicate the absence of harm. If we were to receive a complaint from our employees regarding modern slavery, we would handle it in accordance with the established investigation protocols and internal grievance resolution guidelines of the organization.

CONTINUOUS IMPROVEMENT

As part of the Avis Budget Group continuous commitment to improving its Business, we will seek to improve our Modern Slavery framework across the 2023 reporting period. The key initiatives that we will be working on are:

- Targeted Training – The intention is to roll out further targeted training on the Modern Slavery Risks to line managers that have influence/control on 3rd-parties used by the Avis Budget Group
- Enhanced Governance - As we ramp up our ESG framework, our modern slavery response will form an integral part of it.
- Franchisees Engagement – We will review how we engage with our Franchisee network on the broad ESG fronts and more specifically on modern slavery response.
- Supplier Due-Diligence – We are exploring opportunities to make our supplier due diligence processes more efficient, robust, and systemic through online questionnaires and Third-Party data validation.
- Contractual Framework – We will continue to enhance how we ensure and track that key clause on modern slavery are present in our procurement, agents and franchisee contracts.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

For the Avis Budget Group, effectively managing modern slavery risks means confidently demonstrating and communicating how we address this issue.

We believe that the following key elements are critical to an effective response to modern slavery:

- A clear framework that sets expectations for our employees and supply chain partners, which is communicated throughout our business.
- A broad risk assessment and targeted due diligence processes that enable the timely and accurate identification, prevention, or mitigation of potential modern slavery risks.
- Trusted and accessible mechanisms to facilitate the reporting and remediation of modern slavery-related complaints, as well as non-compliance with the Avis Budget Group's 3rd Party Standard of Conduct.

We acknowledge that accurately tracking the effectiveness of our actions in managing modern slavery risk is complex and that high-level key performance indicators may not always provide a meaningful representation of effectiveness.

Therefore, we are committed to continuing to monitor our operations and supply chain, researching available data to identify any changes in identified modern slavery risks, and collaborating with key industry peers.

We recognise that preventing modern slavery requires ongoing effort and a commitment to continuous improvement. We are dedicated to refining our policies and practices to ensure that we are doing everything we can to prevent modern slavery in our business and supply chain. By being transparent about our efforts and working collaboratively with our stakeholders, we aim to set an example of ethical and responsible business conduct that inspires others in the industry to join us in this fight.

FINALISATION

This statement was approved by Avis Budget Group's Board of Directors on 8 June 2023.



Tom Mooney

Managing Director, Pacific