

MODERN SLAVERY STATEMENT/POLICY



As a business, we maintain relationships with multiple organisations, as well as directly hire over 300 staff across our dealership network. We understand the importance of respecting and improving human rights as fundamental to how we deliver to our guests and communities.

The dealership model can make it challenging to effectively manage sustainability issues because respecting human rights within our supply chain is ultimately often our supplier's responsibility. However, we have adopted various means to clearly communicate our expectations. Furthermore, we seek to identify and do business with organisations that have aligned standards. Our suppliers are required to comply with these laws and we reserve the right to cease our relationship where issues of non-compliance arise or are not promptly addressed.

The purpose of this policy is to outline our approach in relation to respecting human rights and to ensure our business has robust processes in place to minimise the risk of modern slavery within our own operations and associated supply chain. Our key focus areas is to ensure:

- *Modern slavery principles are communicated to our relevant staff and key suppliers;*
- *Our policies and contractual arrangements contain relevant control measures;*
- *We comply with the Australian government reporting requirements, stipulated within the Modern Slavery Act.*

We have a zero tolerance to modern slavery and will make every effort to ensure we always contribute positively to the eradication of slavery, servitude, forced/child labour and human trafficking.

This statement and policy was approved by our Board of Directors on 2 November 2020.

A handwritten signature in black ink, appearing to read 'Joshua Hilton', written over a light grey horizontal line.

Joshua Hilton
Chief Executive Officer
Board of Directors

INTRODUCTION

Modern slavery is a criminal offence. We are committed to providing a work environment free from any violation of human rights that exploits a person(s) for personal or commercial gain such as slavery, servitude, forced compulsory labour and human trafficking.

This policy sets out our commitment to mitigating the risk of this taking place within our own business or supply chain. We see this commitment as a critical way of demonstrating respect for others, as well as supporting the welfare of our employees.

This statement/policy is made pursuant to the Australian Modern Slavery Act.

OUR STRUCTURE

Our Australian business resides on the eastern seaboard, within the states of NSW and QLD, relating to the sale and service of vehicles as well as related products as well as services. Our operating entities include the following trading businesses:

		
		
		

OUR SUPPLY CHAIN

Our primary suppliers are global vehicle manufacturers who provide us with vehicles and parts for sale to our guests.

We also have arrangements with vehicle finance/insurance providers, so that we can provide financial products.

In addition, we engage with numerous other providers for vehicle, guest and employee related goods, services and consumables.

OUR BUSINESS APPROACH

Role Responsibilities

Our Board of Directors and Senior Management Team have overall responsibility for ensuring this policy is implemented and complied with. This cross-functional working group are responsible for:

1. Identifying, assessing and mitigating potential risk areas within the dealership network/supply chain;
2. Focussing on the highest risk areas and mitigating any identified risks;

3. Identifying and implementing process/policy improvements to drive compliance;
4. Communicating with and training the required employees as well as suppliers.

More detailed information on these four key points are outlined below.

Identifying, Assessing and Mitigating Risks

We undertook a review of the potential risks associated with modern slavery practices across our business and supply chain via the following key actions:

Key Action	Overview
Determine	People and Culture Manager drafted this policy and ensured the Board of Directors as well as Senior Management Team were aware of the act/policy requirements.
Identify	The above working group identified key risks that may require communication and/or process/policy review.
Assess	The working group those potential risks against current controls to identify opportunities for improvements or new action.
Develop and Execute	<ul style="list-style-type: none"> • Modified policies and processes; • Updated supplier agreements; • Engaged key suppliers based on risk; and • Built relevant staff awareness.
Reporting	People and Culture Manager submits the government mandated reports in line with the Modern Slavery Act requirements.

OUR ACTIONS

During this process our business identified areas of no or low risk, being operational activities that are directly undertaken by our employees and covered by our internal processes.

We also identified areas of potential risk, where a supplier may source a product (eg: car battery, uniform or technology product) from an overseas source, who may have modern slavery practices still in place. The following actions will be implemented:

Policies, Processes & Agreements

We have formal policies already in place that are intended to promote ethical and legally compliant business conduct. Our policies that contribute to this commitment to preventing the violations of human rights include:

Code of Conduct - our business respects fundamental human rights and is committed to the principals set out within the legal regulations.

Whistle Blower – We protect whistle blowers by encouraging openness and support for anyone who raises a genuine concerns in good faith. We are committed to ensuring no one suffers from detrimental treatment as a result of reporting their suspicions related to modern slavery.

We review these policies annually to ensure that they have robust processes in place to minimise the risk of modern slavery within our business and supply chain.

Training

We focus on ensuring our management team, at all levels, is not only responsible for abiding by this policy but also know how to address any relevant concerns raised by an employee(s).

We train our staff on how to treat others with respect and courtesy, as well as ensure they adhere to our policies and procedures. This is an ongoing due diligence process.

Supply Chain Communications and Control Measures

We acknowledge that we do not have control over the conduct of individuals and organisation within our supply chain. However, we expect the same standard of conduct from all people with whom we have business dealings or act on our behalf, for example but not limited to our vehicle manufacturers, suppliers and contractors.

We are continuously working on improving our processes and agreements, such as revising our supplier and contractor agreements to communicate our zero tolerance for modern slavery.

We now also use these potential risk scenarios to prioritise our future supplier engagements.

POLICY BREACH

If any employee is found to be in breach of this policy, their misconduct will be managed accordingly, up to and including termination of employment.

In the event of a supplier or contractor, where modern slavery is substantiated, the business will assess whether it is appropriate for the business relationship to continue and reserves the right to terminate the agreement without notice.

POLICY ISSUE

This policy was implemented on November 2020 and will be reviewed annually.
