

Modern Slavery Statement 2020

Introduction

Pamsim Pty Ltd recognises its obligations under the Modern Slavery Act 2018 (Cth) and the importance of protecting human rights and ensuring our employees, customers (guests) and those within our supply chain operations are free from all forms of modern slavery.

Pamsim Pty Ltd is committed to fostering ethical, equitable and long-term relationships with our guests, suppliers and employees.

This Modern Slavery Statement sets out the steps taken in the reporting period of 1 January 2020 to 31 December 2020 to prevent modern slavery in our business operations and supply chains.

Business Structure, Operations and Supply Chains

Pamsim Pty Ltd trading as Nunawading Toyota ABN (34 083 219 318) is a private company operating as a motor vehicle dealership in Victoria under a franchising arrangement with Toyota Motor Corporation Australia Limited (TMCA). As at 31 December 2020 Pamsim Pty Ltd's financial year end, the company employed 127 staff.

Our key business operations include:

- the sale of new and used vehicles
- the sale of parts and accessories and aftermarket (car care) products
- the full servicing of new and used vehicles
- the provision of finance, insurance and warranty products to vehicle customers (guests)

Our supply chains include motor vehicles and parts, consumables such as fuel, oil, and lubricants and services including car and office cleaning, waste disposal, transportation of vehicles and parts, IT hardware and software, telecommunications, and office supplies and professional services.

Modern Slavery Risks in Supply Chains and Operations

The automotive industry in Australia relies on the importation of vehicles, accessories and spare parts. Pamsim Pty Ltd sources the majority of products from Toyota Motor Corporation Australia Limited as part of a franchise arrangement.

According to the Walk Free Global Slavery Index 2018 (GSI) findings, as we are based in Australia, our geographic risk of modern slavery is low. There is no identified vulnerability to modern slavery in our industry sector within Australia.

The Global Slavery Index also identifies that the use of migrant workers, especially those in lower skilled sectors is an area vulnerable to modern slavery.

Pamsim Pty Ltd considers the risks of modern slavery practices within its business operations and supply chain to be low as we operate within Victoria, Australia and all of our staff are employed and remunerated under the Federal and Victorian State Awards adhering to Fair Work Act minimum standards. Pamsim Pty Ltd also works directly with Home Affairs on any skilled migrant labour intake within the prescribed legislative framework.

Actions to Assess and Address Modern Slavery Risks

For our first reporting period Pamsim Pty Ltd's focus was to review our most significant supplier arrangements / expenditure, namely the purchase of new vehicles and parts from TMCA.

TMCA have had a long-term commitment to human rights and sustainable development and since 2008 have been guided by their Corporate Social Responsibility Policy which outlines this commitment for the Toyota brand for itself and its suppliers.

TMCA's modern slavery statement details their targeted approach to modern slavery risks within their global supply chain and we would expect that their operations would comply with the Modern Slavery Act 2018.

Going forward as we develop a comprehensive map of our supply chain, we will be investigating those suppliers who may be vulnerable to risks of modern slavery (specifically those with lower skilled labour hire) and those that operate in industry sectors understood to carry a higher risk such as cleaning, construction, manufacturing, security and maintenance.

We acknowledge that each of our suppliers have their own supply chains (our indirect supply chains). Accordingly, the development of a Supplier self-assessment survey is underway and will be distributed to suppliers deemed as higher risk. Once responses are received, we will develop a plan to address and remediate any identified risks.

Pamsim Pty Ltd's continued development of its company policies encourage ethical behaviour and promote compliance with modern slavery and human rights protections.

These include:

- Code of Conduct – which applies to all employees and clearly defines the values of the business and the expectation that all staff will work within its guidelines.
- Employee Handbook
- Personal Conduct Policy – grievance and complaints processes
- Privacy Policy
- Notifiable Data Breach Policy
- Online Incident Register
- Whistleblower Policy
- Modern Slavery Policy

Pamsim Pty Ltd works within the required legislative frameworks for the recruitment of all its staff within Australia and from overseas.

For the current reporting period no modern slavery concerns were identified.

Assessing the Effectiveness of our Actions

Pamsim Pty Ltd recognises that the ongoing monitoring, reporting and mitigation of modern slavery risks is critical. We will continue to communicate with suppliers and our employees to ensure their approach and response to modern slavery concerns and risks is understood and managed in accordance with statutory obligations.

Pamsim Pty Ltd is audited annually by an externally appointed independent auditor. This process ensures legislative requirements are met and weaknesses are highlighted to the executive management and Directors of the business. A traffic light report is presented to executive management and Directors at the end of each audit which requires the executive to respond to and commit to action plans.

Approval

This Modern Slavery Statement is made by Pamsim Pty Ltd for the financial year ended December 2020 and is approved by the Directors.



Simon Jefferson
Director



Brett Jefferson
Director