



Albert Automotive Holdings Pty Ltd
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Modern Slavery Statement 2024

This joint Modern Slavery Statement (the **Statement**) has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) and outlines the steps Albert Automotive Holdings Pty Ltd (**AAH**) and its group companies (collectively, the **Group, we** or **our**) have taken to assess and address the risk of modern slavery in its business and supply chains during the Foreign Financial Year ending 31 March 2024.

1. The reporting entities

This Statement is a joint statement made by the following reporting entities in accordance with the Act:

- a) Albert Automotive Holdings Pty Ltd (ACN 616 126 722);
- b) Albert Automotive MidCo Pty Ltd (ACN 616 520 720);
- c) Albert Automotive Operations Pty Ltd (ACN 616 127 345);
- d) Dutton Garage Wholesale Australia Pty Ltd (ACN 615 833 031);
- e) James Lane Motors Australia Pty Ltd (ACN 615 833 040);
- f) Sellyourcarfast Australia Pty Ltd (ACN 615 833 059);
- g) Dutton Retail 1 Pty Ltd (ACN 155 253 311);
- h) Dutton Retail 2 Pty Ltd (ACN 617 500 302);
- i) Dutton One Workshop Pty Ltd (ACN 636 658 216);
- j) Targa Australia Pty Ltd (ACN 092 438 992);
- k) Sojitz Financial Services Australia Pty Ltd (formerly Dutton Financial Services Pty Ltd) (ACN 628 491 814);
- l) Australian Insurance Replacements Pty Ltd (ACN 637 286 018); and
- m) Dutton Capital Solutions Pty Ltd (ACN 637 861 851).

(collectively, **Dutton Automotive**).

Each of the entities comprising Dutton Automotive use the same policies and processes, operate in the same sector and have many shared suppliers. Accordingly, Dutton Automotive seeks to provide in this Statement a single, consolidated description of its actions to address modern slavery risks.

2. Structure, operations and supply chains

Our structure

AAH is wholly owned by Sojitz Corporation and is the Australian parent company of a diversified group of companies that provide automotive wholesale, retail and associated services operating in the pre-owned automotive sector. AAH has 21 operating sites across Australia, in New South Wales, Victoria, Queensland, South Australia, and the Australian Capital Territory. AAH employs over 276 people across Australia.

Sojitz Corporation acquired ownership of Dutton Automotive on 15 May 2023. Sojitz Corporation is a foreign conglomerate with headquarters in Tokyo, Japan. Sojitz Corporation employs over 20,000 people and operates in 87 countries across the globe in a multitude of industries including Automotive, Aerospace & Transportation, Infrastructure & Healthcare, Mineral Resources & Recycling, Chemicals, Metals, Agriculture, Retail and Consumer Services.

Sojitz Corporation's Automotive Division specialises in automotive assembly and wholesale and retail sales as its core businesses. The Automotive Division operates in various growing global markets, such as Asia, Australia and Latin America, as well as in mature markets, such as Japan and the United States. In addition, this division is actively enhancing its auto-financing business while developing automotive-related services that meet the needs of changing times.

An overview of our Group structure is set out in Schedule 1.

Our operations

Dutton Automotive is Australia's largest, national pre-owned vehicle wholesaler and retailer dealing in general, prestige and luxury cars. With a proud history dating back to 1911, our reputation has been built on a consistently superior level of service, an enviable network of relationships and an unmatched understanding of the automotive industry.

Dutton Automotive operates the following businesses:

- **Dutton Garage** - Dutton Garage is one of the world's premium retailers of classic and collectable cars with our iconic showroom based in Melbourne, Australia.
- **Dutton Garage Wholesale** - Dutton Garage Wholesale is Australia's largest national wholesaler of used vehicles, delivering cars to the largest dealer network in Australia.
- **James Lane Motors** – James Lane Motors (and its brand Classic Throttle Shop) is the luxury, vintage, collectable classic and novelty vehicles arm of the Dutton Automotive group providing exceptionally rare and classic vehicles to car enthusiasts and collectors.

- **Australian Insurance Replacements** - Working with some of the top insurance providers and fleet companies, Australian Insurance Replacements manages every aspect of the buying process while simultaneously delivering the lowest prices.
- **Dutton One** - Dutton One (operated via Dutton Retail 1 Pty Ltd and Dutton Retail 2 Pty Ltd respectively) sells prestige used vehicles from 18 locations across Victoria, New South Wales, Queensland, South Australia and Australian Capital Territory.
- **Dutton One Workshop** – Dutton One Workshop provides motor vehicle repairs, including vehicle inspections and road worthy certificates. The knowledgeable mechanics are experts in luxury automotive, equipped with the highest quality of equipment and years of experience. With a specialty in European vehicles, Dutton One Workshop's offerings range from brake adjustments, suspension checks, general servicing and car detailing.
- **Sell Your Car Fast** - Sell Your Car Fast was established to help people sell their cars quickly, fairly and with no time wasted. It is our mission to provide a smart and seamless way car owners can sell their car, get the offer they deserve and move on.
- **Targa** - With a proud history dating back to 1992, Targa's reputation has been built on our ability to deliver high-quality tarmac rally events in unique destinations within Tasmania, Victoria and Queensland.
- **Sojitz Financial Services** - Sojitz Financial Services has a dedicated team of professionals who have in-depth knowledge of the automotive & finance industry. We make financing new cars easy, with in-depth knowledge to tailor a finance plan which best suits our customer's needs.
- **Dutton Capital Solutions** – Dutton Capital Solutions and its foreign subsidiary (Dutton Labs) is the technology & innovation arm of Dutton Automotive. Dutton Labs is based in Sri Lanka and is a rapidly expanding team of highly skilled Software Engineers, Business Analysts and Digital Marketers. Operating with agility and guided by the expertise of Dutton Automotive's industry & Tech leadership teams, Dutton Labs is fast transforming the automotive market in Australia with enterprise grade technology that changes way the business connects with customers all over Australia.
- **AAH, Albert Automotive MidCo Pty Ltd and AAO** – These 3 entities comprise the operations, governance, compliance, strategy, risk and overall head office and executive functions for the Dutton Automotive group.

Our supply chains

Our supply chain includes predominantly Australian based suppliers (other than as detailed further below in this Statement); by volume and value they overwhelmingly relate to the supply of used vehicles from private individuals and corporations located in Australia. Dutton Automotive's supply chain includes suppliers of the following goods and services:

- automotive parts;

- consumables such as oil, fuel, paint and lubricants;
- logistics and transport services;
- car-washing and detailing services;
- marketing services;
- cleaning, storage and waste disposal services;
- professional services;
- financial products;
- insurance;
- property rental and vehicle storage;
- information technology, telecommunication products and services; and
- general office and workplace supplies.

We also purchase a variety of sub-let services from Australian small businesses and trades.

Dutton Automotive began importing used vehicles from Japan to Australia as a new business in January 2024. Sojitz Corporation purchases used vehicles from various sellers in Japan as the exporter based on procurement orders from Albert Automotive Operations Pty Ltd (**AAO**). The procurement prices are regularly agreed upon in advance between AAO and Sojitz Corporation for each order. The seller parties in Japan include auto auctions, car dealerships, and individuals. Sojitz Corporation physically inspects the condition of each vehicle shortly after procurement. Additionally, Sojitz Corporation conducts inspections as required by the Australian Department of Agriculture, Fisheries and Forestry, radioactive tests, and heat treatments through third-party services before shipment to comply with the import process. The vehicles are delivered to AAO under CIF (Incoterms 2020) terms. Upon arrival at the Australian port, AAO oversees the compliance process, through the engagement of a third party service provider to ensure the vehicles meet Road Vehicle Regulator (ROVER) standards. The vehicles are then taken to the location supervised by AAO.

Our records indicate that, excluding private individuals from whom we purchased used vehicles, we have just over 2,500 suppliers, although we would not have purchased from all of them during the reporting period. Purchases from overseas suppliers are uncommon other than what has been stated in this Statement.

3. Risks of Modern Slavery Practices in our Operations and Supply Chains

Dutton Automotive understands that modern slavery is not confined to any particular industry or geographic region and recognises the importance of vigilance throughout our supply chains. We have sought to understand the inherent modern slavery risks in our operations and supply chains.

The risks of modern slavery in Dutton Automotive 's operations are low. There is no known vulnerability to modern slavery in our activities (automotive wholesale, retail and associated services operating in the pre-owned automotive sector) and these sectors are all highly regulated in Australia under various labour laws and related regulations.

While it is not aware of any modern slavery risks in its own operations, Dutton Automotive

wants to ensure its suppliers continue to uphold the highest standards expected of them. Insofar as the supply of goods and services to Dutton Automotive are concerned, in 2021, we conducted a high-level assessment of modern slavery risks within our first-tier supply chains (**2021 Assessment**). This consisted of engagement with an externally appointed advisor, a review of external suppliers across our operations, as well as engagement with internal stakeholders for their input on likely areas of higher risk of modern slavery. The outcome of that assessment was that our risk profile indicates that any potential risks of modern slavery that may be present would occur further down the supply chain.

We consider that the risk profile has not substantially changed since the 2021 Assessment on the basis that our first-tier supply chains have not substantially changed since the 2021 Assessment was undertaken.

4. Actions Taken to Assess and Address Risks

Dutton Automotive has taken the opportunity to take the following actions in an effort to address potential modern slavery risks in our supply chains:

- **Supplier contracting:** We entrench modern slavery clauses within our supplier contracts. As a preventative measure, we have developed standard contracting provisions requiring our suppliers to comply with all applicable modern slavery laws, take all necessary steps to ensure that there is no modern slavery in their supply chains, implement and maintain appropriate due diligence procedures for their own suppliers, and notify us of any suspected modern slavery in their supply chains. We are implementing these contract provisions into supplier contracts as and when agreed or renewed.
- **Due diligence:** As an investigative measure, we have committed to developing a comprehensive supplier questionnaire to assist us in conducting further due diligence in relation to modern slavery risks with key suppliers and select new suppliers, and in developing a deeper understanding of modern slavery risks below our first-tier suppliers and how modern slavery risks in our supply chain are addressed. We anticipate this comprehensive supplier questionnaire to be finalised and rolled out by or before 31 March 2025.
- **Supplier Code of Conduct:** We are currently developing a comprehensive Supplier Code of Conduct, which sets out our expectations of a high standard of ethical conduct and compliance with all applicable laws. As we implement this Code of Conduct, Suppliers will be expected to be ethical in their business activities, including relationships, practices, sourcing and operations, including in relation to the array of labour and human rights. We expect all suppliers with which we engage to commit to the terms of the Supplier Code of Conduct. We anticipate implementing the Supplier Code of Conduct within the current financial year.
- **Employee conduct:** As both a preventative and detective measure, we have developed and instituted a Modern Slavery Policy across the Group. Our Modern Slavery Policy affirms our commitment to acting ethically and with integrity in all our

business dealings and relationships, and to implementing appropriate systems and controls designed to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

- **Whistleblower Policy:** Our Modern Slavery Policy sits hand-in-glove with our existing Whistleblower Policy, which provides us with sound procedures to allow all current employees, suppliers, employees of suppliers and their families to identify and report genuine concerns about illegal conduct or any improper state of affairs pertaining to the Group, without fear of reprisals.
- **Training:** We have developed an update to our mandatory employee compliance training to include a component on modern slavery risks and compliance.

5. Tracking the Effectiveness of our Actions

We have tasked internal stakeholders with conducting periodic reviews of the arrangements we implement to address modern slavery risks in our operations and supply chains, to determine whether they are effective or require further refinement or improvement.

6. Consultation

The entities comprising Dutton Automotive utilise the same Code of Conduct and Modern Slavery Policy, which is available to all personnel employed in or engaged by those entities. Further, Dutton Automotive operates from centralised headquarters in Richmond, Victoria, the natural consequence of which involves consultation with all subsidiary entities described in section 1 above in the preparation of this Statement. The draft Statement was provided to the principal governing bodies of each of the companies comprising Dutton Automotive for consideration and comment. Each was given an opportunity to consider and provide comments on this statement prior to publication.

7. Approval

This Statement was approved by the principal governing body of each reporting entity covered by this joint Statement.



Matthew Hanson
Chief Executive Officer
Dutton Automotive

Schedule 1 – Group structure

