

## Modern Slavery Statement for the Financial Year ended 31 March 2021

This statement is made and published in accordance with section 13 of the Commonwealth Modern Slavery Act 2018, it sets out the risks and actions taken by Summit Auto Lease Australia Pty Ltd ABN 87 054 704 737 (SALA).

### Group Structure

SALA was established on December 20<sup>th</sup>, 1996 and is a subsidiary company of Sumitomo Mitsui Auto Service Company Ltd (SMAS) incorporated in Japan.

It trades under the business name Summit Fleet Leasing and Management and its head office is at Unit 7, 36-48 South Street, Rydalmere NSW.

SMAS shareholders are

- Sumitomo Corporation,
- Sumitomo Mitsui Financial Group Inc.,
- Sumitomo Mitsui Finance and Leasing Co Ltd, and
- Hitachi Capital Corporation.

At the core of SMAS lies the Company's Business Philosophy. The Corporate Mission Statement is based on this philosophy and represents SMAS fundamental and ultimate value standard stating an "utmost respect for the individual" and placing a prime importance on integrity and sound management.

As a subsidiary company of SMAS, SALA shares its parent company's core values and abides by them through its governance, policies and procedures.

### SALA's Business

SALA operates nationally with physical offices in New South Wales, Queensland, Victoria and Western Australia, without international presence, does not own or control any other entities and has 70 employees.

SALA is a provider of:

- Operating Leases, Finance Leases, Chattel Mortgage and Fleet Management Services for passenger, light commercial and heavy commercial vehicles dealing with small business, corporate and Government clients;
- Novated leases to individuals for motor vehicles;
- Insurance products relating to novated leases;
- Comprehensive car insurance for small business, corporate and Government clients;
- and
- Vehicle sales for passenger, light commercial and heavy commercial vehicles.

### SALA's stance on Modern Slavery and Human Trafficking

SALA supports the principles of the Commonwealth Modern Slavery Act 2018 in the areas of Human Rights, labour standards, environment and anti-corruption measures.

SALA believes that it has an ethical responsibility to promote human rights by showing respect for human rights through its own behaviour, and by sharing this ethos with its customers.

SALA recognises the complexity of Modern Slavery risk, and in particular the variety of ways in which it can manifest in operations and supply chains. SALA is committed to maintaining and improving systems and processes to mitigate the risk that it might be involved, wittingly or unwittingly, in the commission of Modern Slavery and Human trafficking in any part of its operations, customers and supply chain (including contractors and suppliers), products, services and staff activities.

SALA expects its staff, suppliers and business partners to adhere to similar high standards and to take reasonable steps to ensure that other third parties they do business with adhere to similar standards.

## Supply Chain

SALA purchases goods and services from approximately 2,500 suppliers. In the year ended 31<sup>st</sup> March 2021, SALA spent approximately \$192.6 million with suppliers in Australia and overseas, with our largest areas of spend being vehicle purchasing, maintenance, fuel and registration.

SALA takes a collaborative approach to our relationship with our supply chain and encourages transparency by encouraging whistleblowers to report instances of unethical, unlawful or undesirable conduct in accordance with the Whistleblower Policy of SALA. Should issues be reported as a result of our due diligence, we will give guidance and support to our suppliers and contractors to help identify and work through an appropriate resolution.

In the case of repeated or serious instances, we will give consideration to the termination of our relationship accordingly.

Our supply chains include

- Manufacturers, distributors and repairers of automobile and other vehicle supplies;
- Third party contractors providing equipment;
- Consultancy and personnel as part of the sale and operational process;
- Third party contractors providing services to SALA on request in relation to its business activities;
- Provision of daily rental vehicles;
- In-life movement of vehicles;
- Roadside emergency breakdown services;
- Accident management services; and
- Aftermarket products such as fitting out of commercial vehicles, roof rails, tinting, rustproofing etc.

SALA's procurement activities take place in Australia and our Suppliers and Contractors are predominantly Australian based.

We expect all companies we engage with to ensure their goods, materials and labour-related supply chains:

- Fully comply with the Modern Slavery Act 2018;
- Are transparent and accountable; and
- Free from ethical ambiguities.

In assessing risk within our supply chain, we consider the following risk factors:

1. Supplier location;
2. Nature of goods/services provided;
3. The strength of our relationship with the supplier; and
4. The level of corporate governance of the supplier.

Suppliers with evidence of non-compliance with the Modern Slavery Act 2018 in connection with SALA supply chains will be encouraged to follow the reporting procedure outlined within our Anti-bribery and Corruption Policy.

In any event of repeated or serious instances, we will give consideration to the termination of our relationship accordingly.

As part of the on boarding and periodic due diligence reviews performed on customers, assessment is made to determine if they fall within the scope of the Modern Slavery Act 2018, and if so, a copy of their Anti-Slavery Statement is sought and retained.

## Staff

All employees of SALA and contractors are encouraged to identify and report immediately via SALA's whistle blower policy, without fear of retaliation, any conduct that the employee knows or reasonably believes would be contradictory to regulatory requirements or ethical standards, which include, but are not limited to internal policies and guidance in respect to human rights.

In addition, in order to ensure proper understanding of the risks posed by Modern Slavery and Human Trafficking, the employees and contractors of SALA receive training annually on Modern Slavery and Human Trafficking and the requirements of the Modern Slavery Act 2018.

## SALA's policies and due diligence processes for modern slavery and human trafficking

SALA has introduced into place policies and procedures designed to ensure that:

1. Its supply chain reflects SALA's values and respect for the importance of the protection and advancement of human rights;
2. There are improved due diligence processes in relation to modern slavery and human trafficking in its business and supply chain;
3. It can identify the parts of its business and supply chains where there is a risk of modern slavery and human trafficking taking place, and implement steps it has taken to assess and manage that risk;
4. The policies and procedures are effective in ensuring that modern slavery and human trafficking is not taking place in its business or supply chains or is at least reported so that an appropriate response can be implemented by SALA and its suppliers;
5. There is adequate training about modern slavery and human trafficking available to its employees and suppliers; and
6. Established a dedicated committee in Fiscal Year 2020 to address modern slavery in its supply chains and ensure continued compliance with the Act.

Whilst we are confident that we operate in a relatively low risk business sector and our management and processes minimise the risk of modern slavery or human trafficking occurring, we are committed to further improvements and will continue to review and enhance our approach to addressing human rights risks by taking further steps in Fiscal Year 2021 which may include:

- Annual "refresher" compliance, modern slavery and risk training for staff;
- Continuing to strengthen our due diligence procedures to better understand the Modern Slavery Risks posed by potential suppliers prior to on-boarding;
- Rolling out and implementation of specific Modern Slavery contract clauses to all new and existing high risk suppliers where possible; and
- Other measures as we may decide are appropriate having regard to our ongoing assessment of the risks.

## Assessing our Effectiveness

During this reporting period SALA implemented a Modern Slavery policy and all staff members signed a declaration that they understood and agreed to abide by this policy, in addition, all newly hired staff members went through an induction program which includes an introduction to our Whistleblower Procedure as well as compliance training, this has ensured staff engagement on modern slavery issues with potential suppliers up front to ensure that SALA's position to modern slavery is communicated at the outset. This provides us with assurance that modern slavery is front of mind for our supplier.

SALA acknowledges that addressing the challenges of modern slavery is an evolving process and in Fiscal Year 2021 we will assess our effectiveness by:

- Reviewing our existing supplier arrangements and responses to modern slavery questionnaires
- Maintain Senior Management oversight on new supplier/procurement engagement to address modern slavery and obtain modern slavery statements
- The number of suppliers we engage with that are deemed moderate to high risk
- Assessing the impact of modern slavery training and awareness-raising activities for both employees and suppliers

## COVID-19

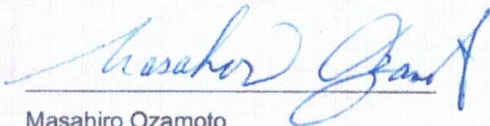
The impact of COVID-19 on our operations resulted in all four offices being closed during Fiscal Year 2020 at various stages and employees directed to work from home until it was safe to return. As at the date of this statement two offices are still operating under COVID19 guidelines with some employees continuing to work remotely, whilst other employees have returned to the office. COVID-19 had a profound impact on many of the manufacturers who supply the vehicles we purchase, resulting in the closure of their operations for various periods causing prolonged delays in the supply of new vehicles for our customers. During this period, we continued to collaborate with customers and suppliers by extending the orders over time and avoiding varying contracts unreasonably or seeking discounts from suppliers.

## Consultation Process

As described above, SALA does not own or control other reporting entities. No consultation process was required.

## Approval

This statement is approved by the Board of Directors on 29<sup>th</sup> September, 2021 and signed by the President of SALA.



Masahiro Ozamoto