

## Modern Slavery Statement – Grand Motors Group

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Rinkglen Pty. Ltd. ACN 072 960 135 and Idlelow Pty. Ltd. ACN 010 727 483 and each of their controlled entities (**we, us, Grand Motors Group**) are committed to conducting business with honesty and integrity. This Modern Slavery Statement, published in accordance with section 14 of the *Modern Slavery Act 2018* (Cth), outlines the steps that Grand Motors Group intends to take to address modern slavery risks in its business.

### Structure, operations and supply chains

Grand Motors Group is one of Australia's largest and most successful privately owned vehicle groups. Operating since the 1950's, Grand Motors Group has grown a wide network of dealership locations spanning across Queensland, New South Wales and Victoria. Grand Motors Group's operations include new and used vehicle sales, vehicle servicing, and the provision of associated products and services.

As at the date of this Modern Slavery Statement, Grand Motors Group's brand portfolio includes the following:

- Mercedes-Benz Gold Coast
- Mercedes-Benz Parramatta
- Mercedes-Benz Castle Hill
- Mercedes-Benz Castle Hill Vans Service
- Mercedes-Benz Seven Hills
- North Shore BMW
- North Shore BMW Bodyshop
- North Shore MINI Garage
- Grand Motors Toyota Southport
- Grand Motors Toyota Harbour Town
- Ryde Mazda
- Ryde Subaru
- Ryde Kia

Grand Motors Group's supply chains include suppliers of:

- Motor vehicles, parts and accessories.

- Equipment and consumables, such as those relevant to our servicing businesses.
- Logistics and transport services.
- Finance and insurance products.
- Professional services, including legal and tax advice.
- Property, cleaning, storage and waste disposal services.
- Car washing and detailing services.
- Information technology and telecommunication equipment and services.
- Office services and supplies.
- Food and beverage services.
- Personnel and recruitment services.

The supply chains in the automotive industry are complex. There are numerous levels of suppliers between Grand Motors Group and the source of raw materials that form the basis of our business' supply chains. Despite this, we are confident that Grand Motors Group operates in a relatively low risk business sector. This is because the principal suppliers of goods to Grand Motors Group are original equipment manufacturers (OEMs) which have sophisticated anti-slavery policies and procedures in place.

While Grand Motors Group employs over 600 people as at the date of this Modern Slavery Statement, we consider the risks of modern slavery practices within our direct operations and workforce as low.

We consider the risks of modern slavery practices to be higher in our supply chain compared to our direct workforce.

The highest risk services in Grand Motors Group's supply chains are:

- critical suppliers for our dealership operations and maintenance, such as cleaning and security;
- suppliers of products using material sourced from outside Australia; and
- IT hardware and software for our corporate offices and centres.

Factors that elevate the risk of labour exploitation and modern slavery practices in the above procurement categories include:

- demand for low-skilled and manual labour, including through migrant workers; and
- poor visibility over indirect suppliers (Tier 2 and beyond).

## Due diligence and remediation processes

We have prepared this Modern Slavery Statement following consultation with key stakeholders across Grand Motors Group, with the intent of capturing risks and requirements specific to our various business units and supply chains.

We note the following risk considerations with respect to modern slavery:

- **Country or region risk:** Countries or regions where Grand Motors Group purchases goods or services may be at particular risk of slavery and human trafficking.
- **Business sector risk:** Certain business sectors have higher risks associated with slavery and human trafficking.
- **Business relationship risk:** We consider who the suppliers, subcontractors, agents, distributors and franchisees are in our supply chain to determine whether any increased risk factors apply in relation to modern slavery.
- **Product or raw material risk:** We consider which raw materials are used in connection with our business or required in the manufacturing process.

In order to identify modern slavery and mitigate associated risks in our business and supply chains, we intend to:

- Consider the geographical location of our suppliers to assist us in assessing risks of modern slavery.
- Assess supplier reputation for modern slavery risks. This might be achieved by undertaking a search of media sources to consider the supplier's track record.
- Where appropriate and practicable, begin the process of integrating contractual obligations into procurement contracts relating to our supply chain to ensure counterparties comply with applicable laws in relation to modern slavery.
- Improve our staff's awareness of modern slavery risks such as through the establishment of our Modern Slavery Policy.

## Our policies

### *Modern Slavery Policy*

We are committed to minimising the risk of modern slavery and human rights abuses in our supply chains and operations. Our Modern Slavery Policy, adopted in December 2022 and updated in December 2023, reflects our commitment to acting ethically and with integrity in our business relationships and to implementing effective systems and controls in relation to modern slavery.

Our Modern Slavery Policy recognises that there is no 'one size fits all' approach to remediation and our response to any such matters should be formulated having regard to the prevailing facts and circumstances. In all cases, however, we will respond in a manner that is proportionate to the harm, and which ensures that the victim's wellbeing is prioritised.

## Our effectiveness in combating modern slavery

We assess the effectiveness of actions being used to assess and address modern slavery risks by:

- Continuing to monitor due diligence processes and make improvements to our systems and controls as we respond to modern slavery risks.
- Tracking the actions taken in response to modern slavery risks and monitoring their impact.

## Consultation process

We have acted in consultation with the relevant entities we own or control in preparing this Modern Slavery Statement.

## Continuous improvement

In the financial year ending 30 June 2024, we updated our Modern Slavery Policy to include minimum modern slavery standards expected of our business, employees and supply chain. In the financial year ending 30 June 2025, we will continue our efforts to identify and reduce modern slavery risks in our supply chains. To that end, we plan to:

- assess and monitor modern slavery risks in our supply chains and operations using the systems and controls outlined above; and
- review our Modern Slavery Policy to ensure it is fit for purpose and update it to the extent required.

This Modern Slavery Statement is made by Grand Motors Group for the financial year ending 30 June 2024.

This statement was approved by the boards of each of the reporting entities covered by this statement, being Rinkglen Pty. Ltd. ACN 072 960 135 and Idlelow Pty. Ltd. ACN 010 727 483. The boards of each entity approved this statement on 20<sup>th</sup> December 2024

This statement is signed by Andrea Gai Fitzsimmons in her role as a Director of both Rinkglen Pty. Ltd. ACN 072 960 135 and Idlelow Pty. Ltd. ACN 010 727 483 on 20<sup>th</sup> December 2024.



Andrea Gai Fitzsimmons  
Director of Rinkglen Pty. Ltd. ACN 072 960 135 and Idlelow Pty. Ltd. ACN 010 727 483  
Date: 20<sup>th</sup> December 2024