

# Modern Slavery Policy

SG Fleet Group Limited  
ABN 40 167 554 574

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## 1. Scope

1. 1. This policy applies to all persons working for SG Fleet Group (the **Company**) or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents and contractors. The policy is supported by, and should be read in conjunction with the Employee Code of Conduct, Supplier Code of Conduct, the Modern Slavery Act Transparency Statement (UK) and the Modern Slavery Statement (AU). Together, these documents outline the Company's position in relation to identifying, managing and/or mitigating modern slavery risks that the Company may be exposed to.

## 2. Purpose

2. 1. The Company is committed to conducting its business activities with integrity and ensuring measures are in place to minimise the risk of modern slavery in its business and supply chain.
2. 2. The Company does not tolerate any form of enslavement or exploitation.
2. 3. This policy is a statement of the overall approach to combatting modern slavery and complying with the Company's obligations under applicable legislation in the jurisdictions in which it operates.

## 3. Policy Statement

3. 1. The *Modern Slavery Act 2018* (Cth) defines modern slavery as a crime and a violation of fundamental human rights. According to the *Modern Slavery Act 2018* (Cth), modern slavery may take various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether of adults or children, all of which have the deprivation of a person's liberty by another, in order to exploit him or her for personal or commercial gain, in common.
3. 2. The *Modern Slavery Act 2015* (UK) is "about slavery, servitude and forced or compulsory labour and about human trafficking"<sup>1</sup>. It states that it is an offence to hold someone, to force someone into labour, to exploit someone (such as sexually, through organ removal or via force, threat or deception) against his/her will, or for anyone to aid someone in committing such an offence.
3. 3. The Company has a zero-tolerance approach to modern slavery and continuously works towards ensuring that practicable and reasonable measures are put in place to identify, manage and/or mitigate modern slavery risks that the Company and the Company's supply chain may be exposed to.
3. 4. The Company is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chain, consistent with its

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<sup>1</sup> <http://www.legislation.gov.uk/ukpga/2015/30/introduction>

disclosure obligations under Australian and U.K. modern slavery legislation. The Company expects the same high standards of all of its contractors, suppliers and other business partners. As part of its contracting processes, the Company includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and expects that its suppliers will hold their own suppliers to account in the same way.

#### 4. Responsibilities for Modern Slavery

4. 1. Legal has overall responsibility for:
  - a) ensuring this policy complies with the Company's legal obligations;
  - b) preparing and ensuring that the Company's annual modern slavery-related reporting complies with its obligations under applicable laws in the jurisdictions in which it operates; and
  - c) recommending the statement to the Board for approval.
4. 2. Legal is the Modern Slavery Policy owner and has primary responsibility for ensuring it is regularly reviewed and up-to-date.
4. 3. The Head of Internal Audit is responsible for auditing internal controls and procedures designed to identify risks of modern slavery practices in the Company's operations under applicable modern slavery legislation.
4. 4. The Group Head of Human Resources is responsible for, in respect of the Company's own operations and the General Manager, Procurement and Supplier Operations is responsible for, in respect of the Company's supply chain:
  - a) monitoring the compliance with the Company's Modern Slavery Policy;
  - b) investigating and identifying risks of modern slavery practices;
  - c) collaborating with Risk and Legal to assess any identified risks;
  - d) identifying opportunities to improve mitigation measures;
  - e) monitoring the effectiveness of those measures;
  - f) reporting all 'modern slavery' compliance activity to the Group Risk Manager and the General Counsel, by 1 August each year; and
  - g) supporting the General Counsel in respect of the preparation of the Company's annual modern slavery statement (and any other reporting obligations), in accordance with its obligations in each of the jurisdictions in which it operates.
4. 5. All employees are required to report any form of modern slavery to:
  - a) in respect of the Company, the Group Head of Human Resources; or
  - b) in respect of suppliers in Australia or New Zealand, the General Manager Procurement and Supplier Operations, Australia; or
  - c) in respect of suppliers in the United Kingdom, the Compliance Manager, UK; or

if the employee is not comfortable reporting the matter to those persons, in respect of any jurisdiction, via STOPline 1300 30 45 50 (For Australia) + 61 398 113275 (outside Australia) as stated in the Company's Whistle-blower Policy.

4. 6. All managers are responsible for ensuring their reports are aware of this Modern Slavery Policy. This includes, where relevant, checking that employees have satisfactorily completed regular training on modern slavery.

## 5. Process

5. 1. Each Managing Director in the Company is accountable for ensuring its region's compliance with local and the Company's group regulatory and reporting frameworks, which include those relating to modern slavery.
5. 2. Anyone involved in selecting, contracting, engaging or procuring products and services from suppliers should refer to the Procurement Policy.

Efforts for ensuring compliance with this Modern Slavery Policy may include (depending on requirements across the different jurisdictions):

5. 3. completing appropriate 'due diligence' efforts in evaluating the suitability of suppliers to provide products or services to the Company, its related entities and customers;
5. 4. should we become aware of any issues with suppliers we will consider and take appropriate steps (which will depend on the nature of the relationship with the supplier and the nature of the breach or alleged breach) and may include steps up to and including termination of relationship;
5. 5. considering any alleged breaches of relevant legislation, or any behaviour or practice that may bring the Company into disrepute by engaging in or supporting practices in modern slavery and imposing relevant disciplinary action to rectify or remedy such alleged breaches, which may include termination of contract and/or reporting to the relevant law enforcement agency; and
5. 6. 'modern slavery' compliance training, which includes employee guidance to assist employees to identify and report risks or incidents of modern slavery.

## 6. Breaches of the Modern Slavery Policy

6. 1. The Company's executive management will assess any breach, or serious risk of breach, of this policy in accordance with section 4 of this policy. The assessment may include developing, and implementing, a plan to take remedial action for any breach or issues, or to mitigate or negate any risks. While the aim is to remedy or prevent breaches from occurring, if or when management does identify a breach, it may decide to invoke disciplinary action, up to and including termination of employment or supplier relationship.

## 7. References

[1] <http://www.legislation.gov.uk/ukpga/2015/30/introduction>.