

# Slavery and Human Trafficking Statement

## Modern Slavery Act Transparency Statement (Modern Slavery Act 2015 (UK))

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This statement outlines the actions undertaken by SG Fleet Group Limited (“**sgfleet**”) and **sgfleet** entities that are within the scope the UK Modern Slavery Act of 2015 (“the Act”) for the year ending 30 June 2017 to identify and mitigate the risk of modern slavery and human trafficking occurring in its supply chains or business.

### 1. Business Overview

**sgfleet** is a company incorporated in Australia and trades in Australia, United Kingdom and New Zealand. Trading subsidiaries of **sgfleet** include<sup>1</sup>:

Australia:	SG Fleet Australia Pty Limited ABN 15 003 429 356
	NLC Pty Limited ABN 57 052 442 645
	NLC Finance Pty Limited ABN 82 163 430 199
	NLC Insurance Pty Limited ABN 64 104 847 252
	Vehicle Insurance Underwriters Pty Limited ABN 85 063 264 371
New Zealand:	SG Fleet NZ Limited CN 1920318
United Kingdom:	SG Fleet UK Limited CN 06143809
	Fleet Hire Limited CN 4110984
	Motrak Limited CN 08537842
	Motiva Direct Limited CN 00959885
	MWay Vehicle Rentals Limited CN 02058990
	Motiva Vehicle Contracts Limited CN 04199340

**sgfleet** provides integrated mobility solutions for its corporate, government and retail clients across Australia, New Zealand and United Kingdom. It operates a shared services model whereby certain functions and services are performed in Australia (head office), with support from the various local offices, for the benefit of all relevant **sgfleet** entities, these shared services include risk management, business information systems, finance, human resources and marketing.

In November 2016 **sgfleet** acquired the Motiva Group of companies and transitional arrangements are in place for integrating these businesses. As at 30 June 2017 **sgfleet** employed more than 700 employees across all jurisdictions.

**sgfleet**'s services and activities are summarised in the table below for each jurisdiction:

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<sup>1</sup> **sgfleet** has a number of subsidiary entities that are dormant, holding companies or special purpose entities that are not included in the scope of the **sgfleet** Modern Slavery Transparency Statement

Australia	United Kingdom	New Zealand
Provider of: <ul style="list-style-type: none"> <li>• operating leases, finance leases and fleet management services for passenger, light commercial and heavy commercial vehicles dealing with corporate and government clients</li> <li>• novated leases and consumer finance to individuals in regard to passenger vehicles</li> <li>• insurance products relating to novated leases, salary packaging and consumer finance</li> <li>• vehicle sales for passenger, light commercial and heavy commercial vehicles</li> </ul>	Provider of: <ul style="list-style-type: none"> <li>• contract hire, daily rental and fleet management services for passenger, light commercial and heavy commercial vehicles dealing with corporate and government clients</li> <li>• salary exchange services to individuals in regard to passenger vehicles</li> <li>• vehicle sales for passenger and light commercial</li> </ul>	<ul style="list-style-type: none"> <li>• Provider of operating leases, finance leases and fleet management services for passenger, light commercial and heavy commercial vehicles dealing with corporate and government clients</li> <li>• vehicle sales for passenger and light commercial</li> </ul>

## 2. Supply Chain

sgfleet's business is primarily office based with the main supply chain categories in relation to our business activities comprising:

- Acquisition and disposal of vehicles
- Roadside emergency breakdown services
- Maintenance and repair of vehicles
- Accident management services
- After-market products such as window tinting , roof racks, first aid kits
- Telematics including navigator technology
- Lease portfolio funding

Other major categories of suppliers include technology, premises, insurers, financial and other professional services.

Based on our sector and the profile of our supply chain, the risk of modern slavery is considered limited. We reject human trafficking and modern slavery in all its forms, and we seek to manage this through appropriate controls embedded in our procurement processes and procedures. We are not aware of any issues of modern slavery in our supply chain, but we also recognise the importance of continuing to be vigilant in managing this risk. **sgfleet** has adopted a supplier code of conduct which articulates the expectation of **sgfleet** from its suppliers including ethical business practices, anti-competitive conduct, safe and fair work conditions and environmental responsibility.

Due diligence is undertaken on all new suppliers and all new supplier agreements include an obligation to comply with the **sgfleet** supplier code of conduct. In addition **sgfleet** reserves the right to conduct ad-hoc audits on suppliers to confirm their adherence to the terms of our agreements. In the year to 30 June 2017 **sgfleet** worked with its automotive and maintenance supplier groups to roll out updated agreements incorporating the **sgfleet** supplier code of conduct. In the coming year **sgfleet** will be publishing an updated supplier code of conduct to specifically deal with human rights issues.

### 3. Employees

*sgfleet* is committed to maintaining a safe workplace that values equal opportunity and that is free from discrimination, harassment and victimization. *sgfleet* entities have policies and procedures concerning employment screening (including work eligibility checks), employment conditions and appropriate workplace behavior. All staff are expected to abide by the requirements of these policies in addition to demonstrating behavior consistent with our values.

### 4. Training

Educating staff is fundamental to ensuring potential human rights and modern slavery risks are identified and managed. *sgfleet*'s current on-boarding and refresher training for staff includes a consistent and mandatory approach in relation to *sgfleet* policies (including codes of conduct) and the laws and regulations of each State and Country relevant to an employee.

In the year to 30 June 2017, training was developed and delivered to relevant staff in order to raise awareness of the issues surrounding modern slavery and human trafficking in key functions and business groups. This training includes specific guidance on how to identify and report suspected incidents, together with signposting to external agencies, helplines and additional support providers.

### 5. Policies & Governance

We are committed to compliance with all applicable laws and standards in the areas in which we operate. Our corporate values of trust, excellence, collaboration and innovation underpin our culture and the way that we conduct business. Policies and procedures are aligned to these values.

*sgfleet* aims to identify and mitigate the risk of modern slavery and human trafficking occurring within its supply chain or business operations. *sgfleet* has established a set of policies and procedures that govern the way it operates, these are relevant to how we manage our potential human rights issues with regard to employees and supply chain. These include, employee code of conduct, employment screening, equal opportunity and diversity, whistleblower programs and supplier code of conduct

Certain *sgfleet* entities are certified to ISO 9001:2008 and/or ISO 14001:2004. While other *sgfleet* entities are working towards certification to ISO 9001:2008. Compliance with business policies and procedures are monitored through the ISO audit program, in addition a dedicated independent internal auditor evaluates the systemic operations of the business and identify areas for improvement in the areas of risk management, procedures and governance.

### 6. Continuous Improvement

*sgfleet* will review and enhance its approach to addressing modern slavery risks by taking the following further steps during the financial year to 2018:

- reviewing its Supplier Code of Conduct to ensure responsibilities in regard to human rights and modern slavery are clear;
- review employee and supplier on-boarding practices in various *sgfleet* entities to establish where further enhancements to existing controls should be made;
- Instituting a mandatory training program for all staff which includes awareness of issues surrounding modern slavery and human trafficking.

This Modern Slavery and Human Trafficking Statement is made pursuant to s54(1) of the Modern Slavery Act 2015 United Kingdom and is approved by the board of Directors of SG Fleet Group Limited.



Robbie Blau  
CEO  
SG Fleet Group Limited