

Slavery and Human Trafficking Statement

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

Parent Company : SG Fleet Group Limited ABN 40 167 554 574
a company incorporated in Australia

Subsidiaries:

Australia - SG Fleet Australia Pty Limited ABN 15 003 429 356
a company incorporated in Australia

New Zealand – SG Fleet NZ Limited Company No.: 1920318
a company incorporated in New Zealand

United Kingdom - SG Fleet UK Limited Company Number: 0614 3809
a company incorporated in the United Kingdom

all trading as sgfleet

United Kingdom - Fleet Hire Limited Company Number: 04110984
a company incorporated in the United Kingdom

trading as Fleet Hire

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1. Company Structure

sgfleet trades in Australia, United Kingdom and New Zealand and Fleet Hire trades in the United Kingdom.

The parent company is SG Fleet Group Limited ACN 167 554 574, a company incorporated in Australia.

Subsidiary companies of SG Fleet Limited are:

Australia: SG Fleet Australia Pty Limited ABN 15 003 429 356

New Zealand: SG Fleet NZ Limited Company No.: 1920318

United Kingdom: SG Fleet UK Limited CN 06143809

Fleet Hire Limited CN 04110984 **sgfleet** recently acquired Fleet Hire and consequently there are a number of transitional arrangements in place to manage the 2 businesses.

2. Activities

<p>sgfleet is primarily a provider of</p> <ul style="list-style-type: none"> • operating and finance leases; • novated leasing; • salary packaging services; • contract hire (long term vehicle hire); • management of vehicle fleets; <p>for:</p> <ul style="list-style-type: none"> • passenger vehicles; • light commercial vehicles; • heavy commercial vehicles and machinery. 	<p>Fleet Hire is primarily a provider of</p> <ul style="list-style-type: none"> • contract hire (long term vehicle hire); • management of vehicle fleets; • salary exchange; <p>for:</p> <ul style="list-style-type: none"> • passenger vehicles; • light commercial vehicles; • heavy commercial vehicles and machinery; <p>and:</p> <ul style="list-style-type: none"> • business asset finance for any type of business asset.
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3. Supply Chain

sgfleet's supply chain touches and concerns products that relate to its primary business activities.

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This **includes**:

- acquisition and disposal of vehicles;
- management of fuel consumption (Australia and New Zealand only);
- roadside emergency breakdown services;
- maintenance and repair of vehicles;
- registration of vehicles;
- fringe benefit tax reporting (Australia and New Zealand only);
- fleet management reporting (Australia and New Zealand only);
- after-market products such as window tinting, roof racks, first aid kits;
- telematics including navigator technology.

4. Corporate Responsibility

sgfleet and Fleet Hire aspire to be regarded as a good corporate citizen with an awareness of its impact on the world we live in. Both **sgfleet** and Fleet Hire have a desire to influence things for the better and minimise any adverse effects on the environment and social fabric flowing from their business operations.

sgfleet and Fleet Hire continuously strive to make good on this aspiration by improving and developing their practices.

A core value for **sgfleet** and Fleet Hire is to conduct their businesses with honesty, integrity, dignity and respect and in an effort to maintain this core value each business will only seek to partner with organisations that have aligned values.

5. Policies and Procedures

sgfleet and Fleet Hire are establishing procedures to require any supplier to be contractually bound to abide to a Supplier Code of Conduct. At present, there are 2 Supplier Codes of Conduct (for each of **sgfleet** and Fleet Hire) and both include covenants for suppliers to act ethically as well as specific requirements relating to the treatment of a supplier's employees.

An internal team has been established to undertake a review of the business' contracts with its suppliers to ascertain which suppliers are not contracted to abide by the Supplier Code of Conduct and then to reverse this.

Presently, **sgfleet** is updating the sgfleet Supplier Code of Conduct to specifically reference the prohibition of human trafficking and slavery. The Fleet Hire Supplier Code of Conduct already references this.

sgfleet nor Fleet Hire are aware of any non-compliance with the requirements of the Supplier Code of Conduct by its suppliers and will not engage with a supplier that does not agree to adhere to, or demonstrate compliance with the Supplier Code of Conduct.

The Supplier Code of Conduct also entitles **sgfleet** or Fleet Hire to request any information it reasonably requires to evaluate a supplier's compliance with the Supplier Code of Conduct.

Practically, **sgfleet** and Fleet Hire carry out due diligence on any new supplier and makes enquiries into that supplier's business practices and operations.

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Enquiries are made of the supplier to demonstrate that its employees do not have:

- excessive working hours;
- unsafe work environments;
- rates of pay below the minimum wage.

Further enquiries are made as how a supplier restricts (or not) a worker's freedom of movements and if there is a practice of confiscating passports.

6. Employees

sgfleet has a Human Resource Manual which is properly followed and incorporated into the day to day operations of the businesses.

sgfleet and Fleet Hire have developed a consistent and mandatory approach to the training of its employees during the tenure of their employment such training topics include:

- **sgfleet** policies;
- the laws and regulations of each State and Country that they are employed to work within.

Each employee is required to subscribe to the Employee Code of Conduct at the commencement of their employment. Employees are thoroughly inducted into the ethos, values and culture of **sgfleet** to ensure that each employee is aware of their responsibilities and standard of behaviour. As part of an employee's induction they are required to complete mandatory training which includes subjects such as an expectation as to the standard of behavior of an employee both during their hours at work and also on social media outside of working hours.

A positive working culture is very important and of utmost priority to **sgfleet** and Fleet Hire.

Included as part of the Employee Code of Conduct are details of **sgfleet's/Fleet Hire's** whistleblower policy which notifies employees as to the procedures and protections given to any prospective whistleblower giving assurances that if they do utilise the whistleblower hotline they may do so without any fear of reprisal or dismissal.

sgfleet and Fleet Hire consistently strive to deliver and demonstrate its commitment to living the values by demonstrating the values through behaviour and leadership.

Presently, **sgfleet** and Fleet Hire are updating its policies and procedures and the in house training provided to employees to specifically reference the prohibition of human trafficking and slavery and also to the Modern Slavery Helpline 0800 0121 700. Fleet Hire has already undertaken training on the Modern Slavery Act.

The policies and procedures give direction to employee on how to manage issues relevant to potential:

- conflicts of interest;
- discrimination;
- unsatisfactory workplace;
- inequity;
- negative reputational risks.

Before a new employee is hired, their work history, right to work in the United Kingdom and identification is verified for accuracy and/or authenticity.

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Both *sgfleet* and Fleet Hire prefer to recruit their staff without the intervention of a third party supplier and has employed a dedicated in house recruitment consultant to manage the recruitment process. However, there are occasions when there is a need for staff to be recruited via third party supplier and this is undertaken only with recognised and reputable recruitment agencies.

7. Audit and ISO

The Australian business operations of *sgfleet* are certified to ISO 9001:2008. *sgfleet* is working towards ISO 9001 certification for its United Kingdom business, whereas Fleet Hire has already obtained this certification.

A dedicated in house Risk Officer and Auditor are employed by *sgfleet* to:

- (Auditor) evaluate the systemic operations of the business and identify areas for improvement in the areas of risk management, procedures and governance; and
- (Risk Officer) identify, assess, measure, manage, monitor and report risks.

8. Risk

sgfleet and Fleet Hire consider that their trading activities and supply chains are at a low risk of attracting slavery and human trafficking.

Regardless of the fact that both *sgfleet* and Fleet Hire regard the risk of attracting human trafficking as low in its operations and supply chain, it nonetheless still has internal key performance indicators for staff performance so that employees are not incentivized for matters such as procuring services and products at the lowest cost and/or quickest lead times which may unwittingly lead to the exploitation of people.

9. Approval

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

10. Signature of Director

Signed by:



Dated: 14th DECEMBER 2016