ESG Strategy 2025



SG Fleet Group
Integrated Mobility

sgfleet

About SG Fleet



SG Fleet Group Pty Limited is a leading provider of integrated mobility solutions, including fleet management, vehicle leasing, and salary packaging services.

SG Fleet operates in Australia, New Zealand, and the United Kingdom and has over 270,000 vehicles under management worldwide.

The Company has a unique position in the marketplace, built on the experience and product expertise of its team, its innovation capability, and a customer-centric approach to service delivery.

SG Fleet actively contributes to the global discussion about the future of transport and shapes the new mobility landscape in cooperation with all levels of government, as well as leading corporates. The Company continuously evolves its highly advanced fleet management capabilities and flexible mobility solutions, and selectively invests in new technologies and business models that are changing the way we move.

Our ambition is to be a trusted partner in shaping the future of sustainable mobility. Our purpose is to solve our customers' mobility needs and aspirations.

About SG Fleet



A Commitment to Positive Behaviours

SG Fleet's approach to long-term value creation for all of its stakeholders is driven by the principle that industry-leading environmental, social, and governance ('ESG') behaviours should be integrated into daily business practices.

SG Fleet established a Sustainability Committee, governed by a Charter, in 2019. In 2021, the Company issued its first Sustainability Statement, outlining the relevant actions taken by the Company during the preceding financial year. Since 2023, this document is referred to as the ESG Statement.

The Company's first ESG Action Plan, which spanned the second half of the 2023 financial year, was developed in late 2022. The Action Plan consists of a list of initiatives grouped under the Environment, Social, and Governance headings earmarked for execution during the period. New Action Plans are developed in June of every calendar year and apply to the subsequent financial year period.

In December 2022, a new governance structure was introduced, reflecting the broader scope of our approach under the ESG Strategy. The Sustainability Committee was replaced by the ESG Committee, in respect of which a Charter was established in January 2023. The Committee's first meeting took place in March 2023.

In November 2024, the Company introduced its third revised Environmental Policy.

The present ESG Strategy outlines SG Fleet's overall approach to ESG risks.

Environment

SG Fleet ensures its day-to-day operations minimise resource consumption, waste, and emissions. In addition, we work with our customers and business partners to assist them with their environmental impact reduction initiatives.

Social

We respect and seek to further the interests of our customers, our employees, and the wider communities in which we operate. Our culture is one of trust, respect, care, and responsibility, and we apply this in all our interactions with every individual, as well as with community groups.

Governance

Across our organisation, we ensure we adopt responsible business practices and policies in all aspects of our operations. SG Fleet has a number of policies in place to instil and promote ethical behaviour across the organisation, as well as our supply chain. We also ensure our people are aware and observant of these policies by conducting regular e-learning sessions.

Our ESG Strategy Approach



Strategy Purpose

Building on the work of the Company's ESG Committee, the ESG Strategy seeks to further optimise how we determine our key ESG risks and how we approach the management of these risks. In determining key risks, the Company takes into account the nature of its business operations, which are predominantly the provision of services in an office-based environment.

Strategy Development Process

In the second half of the 2022 financial year, SG Fleet undertook an ESG Materiality Assessment, assisted by a leading independent sustainability consultant.

This process included a number of steps:

- **Development of an initial risk universe**
  To ensure a comprehensive assessment of all possible ESG risks, the Company developed a risk register based on the risk categorisation defined by the Global Reporting Initiative (GRI), generally accepted as the pre-eminent reference for ESG standards. To these standards were added a number of categories specific to the environment in the geographies in which SG Fleet operates ('country-specific'), as well as those linked to specific reporting requirements in these countries. The resulting risk register included 36 ESG categories.
- **Stakeholder materiality assessment**
  The Company reached out to both internal and external stakeholders to collate input as to the perceived importance of the 36 ESG risks to each stakeholder group and the impact of the management of these risks on stakeholders' assessment and decisions with respect to the Company. This interaction took the form of workshops (staff), extensive surveys (existing customers, suppliers, business partners, industry organisations, charitable organisations, investors, and the Company's leadership team), and analysis of information requests (potential customers).
- **Reporting requirements**
  The Company took into consideration risks related to specific reporting requirements, even if these risks would not normally be perceived as material from a stakeholder's perspective.

The findings of this process were recorded in a risk materiality matrix, which outlines the risks most relevant to our stakeholders and our business. In some instances, risks that would be deemed less material from the perspective of the Company's business activities were identified as material from the perspective of certain external stakeholders (e.g. indigenous communities, forced labour) and accordingly were retained as a key risk for the purpose of this Strategy.

In addition to the focus areas directly material to its stakeholders and its business, the Company also takes into account risks that may be relevant to the wider community or society as a whole. Where SG Fleet is able to make a meaningful contribution to the management of these additional risks, they are included in the ESG Strategy as a secondary focus.

The risks, ranked in order of materiality, were then compared to the Company's current levels of risk management by category (gap analysis) to identify priority action areas.

2025 Update

In line with its commitment to review its ESG Strategy every three years, SG Fleet updated its risk materiality matrix in 2025.

While the nature and the location of the Company's business operations did not change materially, SG Fleet did determine that stakeholder perceptions with regard to certain ESG risks had evolved since the launch of the ESG Strategy in 2022.

As a result, the 'support of Indigenous communities' topic was elevated from the 'not directly material' to the 'key risk' category. In line with this, the Company launched its first Reconciliation Action Plan in September 2025.

Key Risks

	Environmental	Social	Governance
SG Fleet's key risks, as determined by the materiality assessment, are:	✦ Level of emissions impacting the environment	✦ Working conditions (employment) and training ✦ Occupational health and safety ✦ Diversity, non-discrimination, and equal opportunity ✦ Support of indigenous communities ✦ Customer privacy and data security	✦ Business ethics and conduct ✦ Risk and crisis management ✦ Anti-corruption and bribery ✦ Anti-competitive behaviour ✦ Supply chain management ✦ (Presence of) whistle-blower policy
Risks that are perceived as relevant to the wider community, even if not directly material to SG Fleet due to the nature of its business, are:	✦ Other environmental risks, such as energy consumption levels and waste	✦ Forced or compulsory labour in the Company and its supply chain (modern slavery) ✦ Human rights	



Current Risk Approach and Future Focus

Risk	Relevance	Current Approach	Future Focus	Standard
Environmental				
Emissions	As an office-based services company, SG Fleet does not produce meaningful levels of CO_2 in its day-to-day business operations. The Company only operates a small internal fleet of vehicles and the provision of its services does not generally require significant travel or transport. We view it as our duty to deploy our knowledge and help others reduce the impact of their transport activities and make a positive contribution to the environment.	SG Fleet continuously explores options to further cut emissions across Scope 1 and 2 and, where under the Company's control, Scope 3, with a particular focus on the main contributors of emissions. Where possible, we move IT-related equipment and services off premises towards more sustainable solutions. We also source equipment that includes offsets as part of the purchasing or leasing contract. SG Fleet actively targets emissions produced by staff commuting and business travel, offering arrangements and facilities that will reduce fuel consumption overall. This includes carpooling clubs, the availability of eBikes, the installation of bicycle storage sheds, and shuttle bus services to public transport points. The Company continues to move towards a larger proportion of low- or zero-emission vehicles in its own fleet. SG Fleet is carbon neutral across its Australian, New Zealand, and UK operations.	As SG Fleet continues to grow, IT services use, energy consumption, the number of staff commuting, and business travel are at risk of increasing as well. We will counter a corresponding escalation in emissions via a more efficient use of resources, in the process reducing emission intensity per full-time equivalent employee. We will look to further harmonise systems onto cloud-based platforms, allowing us to decommission hardware and reduce the number of data centres required. Various business activities are also being analysed to determine whether we can reduce transport requirements and the use of consumables.	**GRI305**
Energy consumption	As a services company, SG Fleet's energy consumption is largely limited to the operation of its office and warehouse locations, including lighting, power sources, and heating. We approach the management of our energy consumption as an integral part of our overall environmental management approach.	Where corresponding arrangements change or energy consuming equipment is replaced, the Company investigates the feasibility of introducing more energy-efficient alternatives. We also actively encourage our people to be mindful of the energy consumed by office equipment and utilities. SG Fleet has an Environmental Policy and holds ISO14001 Environmental Management System certification.	SG Fleet aims to lower its energy intensity ratio by putting in place additional initiatives to reduce overall energy consumption, including the adoption of 'smart working' set-ups and sensor/timed lighting and air conditioning systems. The Company's objective is to obtain 100% of its electricity from renewable, green resources. Where possible, the Company also continues to explore further opportunities with its landlords to improve the sustainability of its offices.	**GRI302**

Current Risk Approach and Future Focus

Risk	Relevance	Current Approach	Future Focus	Standard
Environmental continued				
Waste	As a services Company, SG Fleet does not produce meaningful quantities of waste, for packaging or other purposes. We approach the management of waste as an integral part of our overall environmental management approach.	SG Fleet aims to minimise waste generation in the conduct of its business. Where waste is generated, for example in the operation of offices, the Company explores opportunities to divert waste from disposal via the process of recycling triage.	We will explore opportunities (in cooperation with our employees) to further reduce waste generation and optimise our disposal process, particularly in the areas of paper, food and equipment disposal, and the use of water. SG Fleet will also cooperate with its suppliers to pursue similar objectives.	**GRI306**
Social				
Working conditions	SG Fleet's success as a business and its ability to deliver excellence in services and products to its customers relies on a motivated workforce. Providing a positive work environment and optimal work conditions is an essential component of our efforts to support our employees.	SG Fleet offers a hybrid work environment, allowing our staff to thrive in a flexible model that can blend in-office collaboration with the convenience of working from home. We also offer extra days of paid leave, industry-leading parental leave benefits, workplace banking and financial wellbeing services, discounted health insurance, and access to flexible salary-packaged vehicle options. The Company's Employee Assistance Programme (EAP) provides free 24/7 medical and mental health help to our employees and their families via chat, phone, or in-person by licensed medical specialists. SG Fleet has implemented a service recognition program that acknowledges and rewards our people's dedication. A separate award program also recognises staff for their commitment to the Company's values of Innovation, Collaboration, Excellence, and Trust.	SG Fleet will continue to implement strategies that support role and work flexibility and introduce further benefits that ensure the Company's workplace fosters a healthy culture and protects the wellbeing of its people. We will also investigate other workplace arrangements and approaches that reflect a greater awareness of the social impacts and individual circumstances of working conditions.	**GRI401**
Training	SG Fleet is committed to support the continued growth of its people. We have a reputation within the industry of developing the best available talent and expertise. Upskilling our staff is essential in order to retain our industry leadership position.	SG Fleet provides formal and informal advancement and learning opportunities that recognise and grow the ability, capacity, and leadership skills of our people. We actively support employees who are proactive in developing their knowledge and wish to further their education outside of working hours.	SG Fleet will continue to investigate opportunities to extend the range of its current training structures, both in terms of training topics and the ability of staff to access training. We will also implement initiatives to optimise the onboarding and continued education process.	**GRI404**

Current Risk Approach and Future Focus

Risk	Relevance	Current Approach	Future Focus	Standard
Social continued				
Occupational health and safety	SG Fleet places the well-being of its people as its top priority, and fosters a cooperative and supportive environment where our teams can thrive. We approach Occupational Health and Safety from a holistic perspective, going beyond simply ensuring safety in the workplace to include initiatives that foster the physical and mental health and wellbeing of our people at work and at home. All appropriate laws and internal regulations (including workplace health and safety laws) are fully complied with.	To provide our staff with a healthy work environment, we conduct regular e-training on a range of topics that can impact their wellbeing. In addition to risk mitigation education, we encourage our people to proactively look after their health by providing access to a range of wellness benefits and activities. SG Fleet also actively supports community initiatives to raise awareness of the importance of good physical and mental health. SG Fleet holds ISO45001 OH&S Management certification.	We continue to investigate other occupational health and safety aspects (with an increased focus on mental health), within the workplace and in support of our employees' wellbeing outside the workplace and at home. Our focus will remain on supporting overall wellbeing, physical and mental, and on addressing specific assistance needs as they arise.	**GRI403**
Diversity and equal opportunity	SG Fleet's business success is built on the expertise of its people. We recognise the importance of being an inclusive employer and have a strong commitment to equal opportunity and diversity, with a focus on gender diversity. Diversity drives the Company's ability to attract, retain and develop the best talent, create an engaged workforce, deliver the highest quality of service to customers, and achieve sustainable growth.	We believe everyone should feel respected, valued, and empowered to be their true selves, both at work and beyond. SG Fleet complies fully with the Workplace Gender Equality Act (2012) and is a complying employer with the Workplace Gender Equality Agency.	SG Fleet continues to work towards a diverse workforce, including balanced gender representation at Board and Senior Management level. The Company will develop strategies to specifically support gender equality in accordance with WGEA best practice guidelines, such as talent management, remuneration, recruitment and promotion. The Company intends to widen its diversity focus to other areas, in addition to gender, and ensure that a more diverse representation also translates into actual inclusion of more diverse opinions.	**GRI405**
Non-discrimination	We celebrate the diverse range of cultural backgrounds and experiences of our employees and provide a work environment that is free from discrimination. In addition, SG Fleet is committed to ensuring no discrimination occurs against customers, suppliers, and other stakeholders.	SG Fleet's Code of Conduct stipulates compliance with the letter and spirit of a full range of anti-discrimination laws to establish a workplace free from any kind of discrimination. The Company conducts regular e-training on discrimination to reinforce awareness and correct behaviours.	SG Fleet will continue to improve relevant education as well as enhance the necessary processes to identify and address related incidents. We will also investigate initiatives that will help break down perceptions that foster discrimination.	**GRI406**
Indigenous communities	SG Fleet is committed to furthering wherever possible the cause of Aboriginal and Torres Strait Islander and other indigenous communities in the geographies in which it operates.	In addition to offering employment opportunities, SG Fleet actively supports indigenous business ventures. We are a proud member of Supply Nation, which aims to promote and support procurement through indigenous organisations and create a more inclusive economy. The Company launched its first Reconciliation Action Plan in 2025.	SG Fleet is aiming to build the right perspective amongst its leadership and its people in preparation for the execution of its Reconciliation Action Plan. We will continue to put a greater emphasis on supporting indigenous businesses and employment where practical and viable.	**AUNZ02**

Current Risk Approach and Future Focus

Risk	Relevance	Current Approach	Future Focus	Standard
Social continued				
Customer privacy	To be able to create value for its customers and conduct its business in an efficient manner, SG Fleet must collect and process certain personal and business information. The way we collect, use, and retain this information is governed by strict protocols and detailed processes.	SG Fleet complies with all applicable privacy laws in each jurisdiction in which we operate and processes customer information in accordance with our privacy policies. Our Personal Data Protection Policy sets out how we protect the personal data we collect. The awareness of the importance of customer privacy and the need for secure handling of data is reinforced at the individual employee level through regular staff updates and continuous training via our e-learning portal. The SG Fleet Group has ISO27001 Information Security Management certification and met all its relevant information security governance objectives.	Further enhancements of SG Fleet's relevant processes will be introduced as the cyber security environment continues to evolve. Improvements are targeted in the areas of information asset and data governance and protection, and privileged access to information systems.	**GRI418**
Forced or compulsory labour	SG Fleet does not tolerate any form of enslavement or exploitation and we are committed to ensure measures are in place to minimise the risk of modern slavery in our business and in our supply chain.	SG Fleet has voluntarily put in place a Modern Slavery Policy, which outlines its overall approach to combatting modern slavery. We issue Modern Slavery Statements overviewing our initiatives during the respective reporting periods in Australia (pursuant to the *Modern Slavery Act 2018* (Cth)) and the United Kingdom (pursuant to the Modern Slavery Act 2015 (UK)). The Company also regularly conducts supplier surveys in order to identify any modern slavery risks.	SG Fleet intends to optimise the process by which it identifies modern slavery risks as well as how any identified risks are investigated and addressed.	**GRI409**
Human rights	As an office-based services company, SG Fleet's exposure to the risk of human rights infringement is limited. The Company does however expect partners in its supply chain that are more likely to encounter human rights issues to take necessary measures to mitigate against this risk.	SG Fleet's approach to ensure responsible internal conduct with respect to human rights centres on the training of staff on related topics, such as modern slavery, non-discrimination, and diversity and equal opportunity. The Company's Supplier Code of Conduct stipulates its expectations with regard to the conduct of suppliers in terms of modern slavery risks, the treatment of labour, and human rights generally.	SG Fleet will continue to investigate the need for additional human rights-related employee training. We also intend to introduce supplier selection criteria that take into account human rights management and behaviours of potential suppliers, as well as work with our existing suppliers to achieve better outcomes across a range of related aspects.	**GRI412**

Current Risk Approach and Future Focus

Risk	Relevance	Current Approach	Future Focus	Standard
Governance				
Business ethics and conduct	Across our organisation, we ensure we adopt responsible business practices and policies in all aspect of our operations.	SG Fleet has a number of policies in place to instil and promote ethical behaviour across the organisation, as well as our supply chain. SG Fleet also ensures its people are aware and observant of these policies by conducting regular e-learning sessions. Our people are expected to conduct themselves in a manner consistent with the Company's standards and in compliance with all relevant legislation. The Code of Conduct outlines how the Company expects its representatives to behave and conduct business in the workplace on a range of issues. It includes legal compliance and guidelines on appropriate ethical standards.	SG Fleet will continue to review its Code of Conduct as required, further improve the processes in place to ensure adherence to the Code, including training, and optimise how it addresses any breaches.	**CGPR3**
Risk and crisis management	The presence of effective risk management structures and processes is essential for the continued conduct of SG Fleet's business operations.	SG Fleet has a strong risk management culture and a robust operating model, embedding governance and risk responsibilities across multiple lines of defence. The Company identifies relevant risks and ensure they can be addressed as required. SG Fleet maintains a dedicated internal audit function. We regularly review our risk management framework and internal control framework, while the internal audit team provides independent and objective assurance on the effectiveness of governance, risk management, and internal control processes.	SG Fleet will continue to review its risk management approach and processes, in line with the evolving nature of its business and its operational environment.	**CGPR7**
Anti-corruption and bribery	SG Fleet prohibits bribery and corruption in any form, whether direct or indirect, and in any country in which it operates. The Company adheres to all related laws and regulations.	SG Fleet has adopted an Anti-bribery and Corruption Policy. The Policy details the Company's commitment to conducting its business activities with integrity and ensuring measures are in place to prevent bribery and corruption. The Company expects its employees to demonstrate honesty, integrity, and fairness in all aspects of their business dealings and exercise a high standard of professionalism and ethical conduct in all their activities. We take appropriate steps to ensure that we do not, directly or indirectly, offer, promise, give, accept, or demand a bribe or other undue advantage in order to obtain or retain business. The Company promotes employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures, policies, and training programmes.	SG Fleet will continue to review its Anti-bribery and Corruption Policy as required, further improve the processes in place to ensure adherence to the Policy, including training, and optimise how it addresses any breaches.	**GRI205** **CGPR3**

Current Risk Approach and Future Focus

Risk	Relevance	Current Approach	Future Focus	Standard
Governance continued				
Anti-competitive behaviour	The Company aims to maintain its reputation of having a high standard of ethical behaviour in conducting business and to behave with integrity in all dealings with competitors and customers.	SG Fleet's Code of Conduct stipulates the behaviours required to meet its standards in terms of responsible business practices. The Company actively monitors for any breaches of the Code.	SG Fleet will continue to review its Code of Conduct as required, further improve the processes in place to ensure adherence to the Code, including training, and optimise how it addresses any breaches.	**GRI206**
Supply chain management	We view it as our responsibility to promote ethical behaviour not just within our business operations, but also at supplier level. SG Fleet views its supply chain as an extension of its own operations, carrying a reputational risk if behaviours are inconsistent with the Company's own ESG values and approach.	SG Fleet takes great care in selecting suppliers of goods and services and we expect our suppliers to operate to recognised national and international standards, and appropriate codes of practice. In order to do so, we have put in place a Supplier Code of Conduct and a Procurement Policy. These policies set out the requirements we expect from our suppliers in the areas of ethical business practice, anti-competitive conduct, labour and human rights, work health and safety, environment, and confidentiality and provision of information.	In addition to further optimising the process by which it identifies modern slavery risks in its supply chain, SG Fleet intends to take a similar approach to the review and management of other ESG risks and how the ESG performance of potential suppliers is taken into account in the Company's supplier selection process.	**GRI204**
Whistle-blower Policy	SG Fleet is committed to ensuring that serious misconduct or malpractice is identified and addressed appropriately. We believe that the ability to raise related concerns is an important mechanism to ensure that the Company functions efficiently and in accordance with its own principles of conduct.	SG Fleet has adopted a Whistle-blower Policy in accordance with the Corporations Act, and a separate policy applies to the United Kingdom. We acknowledge that the Company's core values emphasise a culture encompassing strong corporate governance, sound business practices, and good ethical conduct. This is supported by a commitment to maintaining an open working environment in which its employees are able to report unacceptable conduct and behaviour and without fear of intimidation or reprisal. The Whistle-blower Policy encourages whistle-blowers to raise concerns and reportable conduct, where there are reasonable grounds to support such action and to ensure that serious misconduct or malpractice are identified and addressed appropriately.	SG Fleet's Audit, Risk, and Compliance Committee will continue to review its Whistle-blower Policy annually, and further improve employee awareness of and access to the whistle-blower process.	**CGPR3**

Review



The Strategy will be updated as necessary, but at least once every three years, to incorporate any changes to the Company's ESG risk profile (e.g. changes in materiality of individual risks) or business operations, and reflect progress made with the management of previously identified risks. Changes will also be made in line with any newly introduced regulatory and legislative requirements.

The Company may also engage with independent consultants to further optimise its ESG Strategy and approach.

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