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

This statement is made pursuant to the Modern Slavery Act 2015 (UK) by SG Fleet Group Limited ("**SG Fleet**") and its related entities[1] for the year ending 30 June 2020.

1. Business Overview

SG Fleet is a leading provider of integrated mobility solutions, including fleet management, vehicle leasing and salary packaging services, with a presence across Australia, as well as in the United Kingdom and New Zealand. In the 2020 financial year, we employed approximately 700 staff worldwide and had over 143,000 vehicles under management.
We operate under two brands across corporate and consumer business segments: SG Fleet (operating in Australia, UK and New Zealand) and nlc (Australia).

SG Fleet's services and activities for each jurisdiction are summarised in the table below:

Australia	**United Kingdom**	**New Zealand**
Provider of: • passenger, light commercial and heavy commercial vehicle operating leases, finance leases and fleet management services for corporate and government customers • passenger vehicle novated leases and consumer finance for individuals • insurance products relating to leased and managed vehicles for corporate and government customers and for novated leases • disposal of passenger, light commercial and heavy commercial vehicles • other mobility solutions including car share and subscription services • other vehicle-related services, such as mobility and EV consulting and repair portals	Provider of: • contract hire, finance lease, daily rental and fleet management services for passenger, light commercial and heavy commercial vehicles for corporate and government clients • vehicle salary sacrifice services for individuals • personal vehicle contract hire for individuals and sole traders • disposal of passenger, light commercial and heavy commercial vehicles • insurance products relating to salary sacrifice leases for individuals	Provider of: • passenger and light commercial vehicle operating leases and fleet management services for corporate and government clients • disposal of passenger and light commercial vehicles • other vehicle-related services, such as mobility and EV consulting

[1] For more information about our business structure and list of subsidiaries, please refer to our 2020 Annual Report.

2. Supply Chain

Our business is primarily office-based with the main supply chain categories in relation to our business activities comprising:

- provision of daily rental vehicles
- acquisition and disposal of vehicles
- in-life movement of vehicles
- roadside emergency breakdown services
- maintenance and repair of vehicles
- accident management services
- after-market products such as racking for commercial vehicles, fitment of roof bars and roof rails etc
- telematics including navigator technology
- lease portfolio funding

Other major categories of suppliers include IT, commercial property, insurance, financial, marketing and other professional services.

We aim to do business with suppliers that have similar values and ethical business practices, including those related to human rights. We assess risk in our operations and supply chain through consultations with relevant internal stakeholders. Risk factors include the location of the supplier, the nature of the goods and services provided, the level of control we have over the supplier and our understanding of the supplier's level of corporate governance.

Following this consultation, we have assessed our exposure to the risk of modern slavery and human trafficking as low as we operate in countries with a relatively low prevalence of slavery[2]. However, we recognise that modern slavery risks may go beyond our immediate suppliers, for example where their suppliers may have operations in countries where slavery and human trafficking is more prevalent, or where their suppliers may use raw materials in manufacturing (for example the manufacturing of motor vehicles) where those raw materials are sourced from high risk countries.

3. Policies & Governance

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

SG Fleet aims to identify and mitigate the risk of modern slavery and human trafficking occurring within its supply chain and business operations. To this end, SG Fleet maintains a set of policies and procedures that govern the way it operates. Our policies and procedures are aligned to our values, govern the way we operate and reflect how we manage our potential human rights issues with regard to operations and supply chain. These include our Employee Code of Conduct, employment screening, equal opportunity and diversity, whistle-blower programs and Supplier Code of Conduct. Compliance with business policies and procedures are monitored through an internal audit program.

4. Supplier Code of Conduct

We have adopted a Supplier Code of Conduct which articulates our expectations from our suppliers, including in respect of their stance on modern slavery and human trafficking, ethical business practices, anti-competitive conduct, safe and fair work conditions and environmental responsibility.

Our standard new (and renewed) supplier agreements include an obligation to comply with our Supplier Code of Conduct or to have an equivalent policy. We may also reserve the right to conduct ad-hoc audits on suppliers to confirm their adherence to the terms of the agreements.

[2] According to the 2018 Global Slavery Index published by The Walk Free Foundation.

5. Employees & Training

SG Fleet is committed to maintaining a safe workplace for all staff, which values equal opportunity and is free from discrimination, harassment and victimisation. Educating staff is fundamental to creating such an environment, and to ensuring that potential human rights and modern slavery risks are identified and managed.

SG Fleet entities have policies and procedures concerning employment screening (including work eligibility checks), employment conditions and appropriate workplace behaviour. All staff are expected to abide by the requirements of these policies in addition to demonstrating behaviour consistent with our values. All new staff are required to complete comprehensive training in relation to SG Fleet policies (including codes of conduct), laws and regulations of each state and country relevant to an employee. Annual 'refresher' compliance training is mandatory for all staff. Completion is monitored and tracked through an online system. Failure to complete the training within the specified timeframe is escalated to the employee's line manager.

Non-compliance with the SG Fleet Employee Code of Conduct and other policies is taken seriously. Any failure to comply with the Code of Conduct may lead to disciplinary action, which can include termination of employment.

6. FY-2020 Performance

In the 2020 financial year, we have continued our endeavours to combat slavery and human trafficking by:

- reviewing our Supplier Code of Conduct to ensure ongoing compliance with relevant legislation;
- determining that a requirement that suppliers comply with SG Fleet's Supplier Code of Conduct is to be included in new (and renewed) supplier contracts, or alternatively, that suppliers must have an equivalent policy;
- working on the implementation of a supplier due diligence questionnaire that requests details of the relevant supplier's modern slavery statement or details of how they prevent modern day slavery within their supply chain;
- maintaining whistleblowing policies to facilitate the reporting of incidents with regard to corporate social responsibility, including modern slavery and human trafficking.

7. Effectiveness of our actions

Although it is very difficult to assess the effectiveness of the steps taken, relevant indicators include:

- the number of issues or potential issues identified by management;
- the number of notifications of risks or issues received from staff, the public or law enforcement agencies;
- the incidence of suppliers or other participants in our industry being involved in modern slavery.

We have not received any notifications or identified any issues. However, we will continue to remain alert to the risk of modern slavery and human trafficking.

8. Continuous Improvement

Whilst we are confident that we operate in a relatively low risk business sector and our management and processes minimise the risk of modern slavery or human trafficking occurring, we are committed to further improvements and will continue to review and enhance our approach to addressing human rights risks by taking further steps. This may include:

- annual "refresher" compliance and risk training for staff;
- ongoing consideration and assessment of SG Fleet's supply chain in order to monitor the risk posed;
- other measures as we may decide are appropriate having regard to our ongoing assessment of the risks.

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