

Modern Slavery Statement 2021

This Statement is published in accordance with the Modern Slavery Act 2018 (Cth) (**Act**) and outlines the steps Inchcape Australia Limited and its group companies has taken to assess and address the risk of modern slavery in our business and supply chains during the financial year ending 31 December 2021. This is our second Modern Slavery statement under the Act.

A. The reporting entities

This is a single joint Statement and covers the following group entities:

- Inchcape Australia Limited (**IAL**);
 - Subaru (Aust) Pty Ltd (**Subaru Australia**);
 - Inchcape European Automotive Pty Ltd (**Peugeot Citroen Australia**);
 - Trivett Automotive Retail Pty Ltd (**Trivett**); and
 - AutoNexus Pty Ltd (**ANX**).
- (collectively, **Inchcape Australia**)

B. Structure, operations and supply chains

IAL is ultimately owned by Inchcape plc, a company domiciled in the United Kingdom and listed on the London Stock Exchange. IAL is the Australian parent of the Inchcape Australia group companies Subaru Australia, Peugeot Citroen Australia, Trivett and ANX.

Inchcape Australia is a leading player in the automotive services sector operating in the distribution, retail and logistics markets.

The Inchcape Australia group operates the following businesses, with the following supply chain requirements:



Main operations	Supply chain requirements
<p>IAL supports five businesses through 7 shared services functions, being:</p> <ul style="list-style-type: none"> - Finance - Human Resources - Information Systems - Legal & Company Secretariat - Procurement - Marketing & PR - Property 	<p>IAL mainly purchases goods and services in the following categories:</p> <p>Facilities management - security, cleaning, office supplies, postage and couriers, waste management, catering, fire protection and furniture.</p> <p>Finance, company secretarial & legal services - insurance, professional company secretarial, legal and financial support.</p> <p>Human Resources - recruitment, training, employee and payroll services</p> <p>Information Technology - hardware, software, telecommunications and network services.</p> <p>Marketing and PR - advertising, media, creative services, print, public relations and marketing services.</p>

	<p>Operations - call centres, freight, health and safety, workshop parts and consumables, warehousing and logistics.</p> <p>Property - rent, signage, access goods and services, utilities, local authority payments and building services.</p> <p>Travel and Events - travel management, local & international transport, accommodation, parking, employee and customer events.</p>
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SUBARU

Confidence in Motion

Main operations	Supply chain requirements
Subaru Australia is the exclusive Australian importer and distributor of new vehicles manufactured by Subaru Corporation of Japan.	Subaru Australia mainly purchase vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies.



Main operations	Supply chain requirements
Peugeot Citroen Australia is the exclusive Australian importer and distributor of new Peugeot & Citroen vehicles manufactured by Groupe PSA of France.	Peugeot Citroen Australia mainly acquires vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies.



Main operations	Supply chain requirements
Trivett operates an automotive retail business selling, servicing and financing new and used vehicles, with dealerships located in New South Wales, Victoria and Queensland.	<p>Trivett mainly acquires the following goods and services:</p> <p>Operations - vehicle cleaning, service, maintenance and repairs, vehicle logistics, workshop parts, consumables and customers gifts</p> <p>Facilities Management - cleaning</p> <p>Marketing and PR - creative services, digital advertising and hosting services, local print and radio media</p> <p>Vehicles and Vehicle Parts – new vehicles from its OEM or Distributor partners, including Subaru, Peugeot Citroen Australia, Mitsubishi Australia, Isuzu Ute Australia, Volkswagen Group Australia, FCA Australia and Kia Australia parts, MRO & workshop consumables.</p>



Main operations	Supply chain requirements
<p>ANX is a leading national operator in the automotive services industry providing fleet conversions, fleet refurbishment and maintenance, vehicle logistics, parts & vehicle warehousing and distribution, and inventory management services.</p>	<p>ANX mainly acquires goods and services in the following areas:</p> <p>Finance and Legal - insurance</p> <p>Human Resources - temporary and contingent labour</p> <p>Operations - freight, distribution and packaging materials, MRO consumables and services.</p> <p>Property - property management rent and utilities.</p>

C. The risks of modern slavery practices in Inchcape’s operations and supply chains

In the previous reporting period, Inchcape Australia sought to understand the inherent modern slavery risks in its operations and supply chains and, in doing so, conducted a detailed review of its supply chains.

Inchcape Australia’s preliminary risk analysis at that time was that the inherent risk of modern slavery practices in its operations and supply chain is **very low**, and this remains Inchcape Australia’s analysis. Over 99% of Inchcape Australia’s spend at the time the detailed review of its supply chains was conducted was on products originating from five countries, with over 98% originating from Japan and Australia, and has not changed materially since then. Both of these countries continue to rank amongst the lowest in the world for the prevalence of modern slavery.

Overall, our view remains that the inherent risk of modern slavery in Inchcape Australia’s operations and supply chain is very low as most of the goods and services Inchcape Australia purchases are from countries where the prevalence of modern slavery is considered to be quite low. Products purchased from higher risk countries only account for approximately 1% of the products Inchcape Australia acquires.

D. Actions taken to assess and address modern slavery risk

In this reporting period, Inchcape Australia:

- continued to operate with modern slavery elements incorporated into existing policies and procedures. Inchcape Australia’s Supplier Code of Conduct specifically addresses the risk of modern slavery. As a condition of working with Inchcape Australia group companies, suppliers must agree to abide by our Supplier Code of Conduct which specifically requires them to comply with all laws associated with the prohibition of modern slavery, respond to any modern slavery assessments Inchcape Australia issues, implement procedures to ensure their supply chains are as reasonably possible, free of modern slavery practices, and immediately notify Inchcape Australia if they become aware of any potential or actual risk that a supplier in their own supply chain has engaged in modern slavery or associated practices. Similar requirements are incorporated into Inchcape’s Purchase Order terms and conditions and Inchcape’s Supply Agreements.

- continues to encourage access to its Whistle-blower Policy and an external whistleblower hotline administered by an independent third-party operator. The hotline is available 24/7 and allows current and former directors, officers, employees, associates and contractors, as well as Inchcape Australia's suppliers and service providers, to disclose anonymously and confidentially any concerns they may have about any illegal or unethical activity such as suspected modern slavery practices;
- sent surveys to a small number of suppliers that Inchcape Australia considered could either supply or obtain supply of goods or services in higher risk places of origin. Results were mixed, and Inchcape Australia is considering the usefulness of the surveys, or whether to refine them or change the survey process, as well as whether to expand the group of suppliers surveyed;
- Inchcape Australia has further updated compliance training and has prepared a specific training program on modern slavery risks and compliance, for staff in purchasing and management roles. This training program was developed during the reporting period and will be implemented in H2 2022.

E. Assessing the effectiveness of Inchcape's actions

Inchcape Australia continued on its journey on modern slavery due diligence during the reporting period, and will continue to review, assess and measure the effectiveness of actions taken to address modern slavery, to determine whether they are effective or require further refinement or improvement.

F. Consultation with Inchcape's entities

Inchcape Australia has a Modern Slavery Project Team that works across all business units and functional departments. The Modern Slavery Project Team consults with key staff members of each business unit as and when required and regularly informs them with updates.

G. Other information

Inchcape Australia notes that during the reporting period the COVID-19 pandemic continued to affect Australia and the World in a significant way. As at the date of this Statement, we have not been able to identify any specific risks of modern slavery that may have surfaced due to COVID-19. If Inchcape Australia becomes aware of any such risks in 2022, we will include them in our 2022 Modern Slavery Statement.

Approval

This Modern Slavery Statement was approved by the Board on 28 June 2022.



Colin Christie
Managing Director
Inchcape Australia Limited