

Rex Gorell Family Group

Modern Day Anti-Slavery Statement

Modern Slavery Statement for Rex Gorell Family Group and associate companies for financial year ending 30 June 2020.

Associate Companies:

- Rex Gorell Family Group Pty Ltd
- Rex Gorell Pty Ltd
- Rex Gorell Motors Pty Ltd
- Rex Gorell Ford Pty Ltd
- RPBJ Gorell Pty Ltd
- RPBJ Pty Ltd
- Mercredi Pty Ltd
- Baguba Pty Ltd

Anti-Slavery and Human Trafficking Policy

Rex Gorell Family Group has a zero-tolerance approach to modern slavery both within the Group and within its Companies it does business. We have reviewed our compliance and risk management processes to ensure we comply with the Commonwealth Modern Slavery Act 2018.

Our code of conduct states that Rex Gorell Family Group respects fundamental human rights and is committed to the principals set out in the Commonwealth Modern Slavery Act 2018. We support and respect the protection of human rights within our area of influence and the effective elimination of compulsory labour and child labour. The code of conduct governs all our business dealings and the conduct of all persons or organisation's with whom we have business relationships. The code of conduct applies to all Rex Gorell Family Group operations and employees. Rex Gorell Family Group expect the equivalent standards of conduct from all persons acting on its behalf, such as suppliers and franchise partners.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all those we have business dealings.

Our attitude to modern slavery can be summed up as – Zero Tolerance.



Rex Gorell

Chairman

BACKGROUND

The Rex Gorell Family Group is composed of seventeen Car Dealerships in various locations in Geelong, Victoria. We are a business that retails cars, supplies spare parts and services cars. We are largely supplied by Dealer Manufacturers, including, Ford, Landrover, Volvo, Jaguar, Nissan, Honda, Audi, Renault, Volkswagen, Subaru, Skoda, Peugeot, Citroen, Isuzu, MG, Jeep, BMW and Mini.

We are determined to ensure that slavery and human trafficking are not taking place in any of our supply chains. Most of our supply chains provide the supply of vehicles and parts from international automotive manufacturers as listed above.

These lower risk manufacturer supply chains constitute the majority of our total supply chain. We are pleased to note that most of these manufacturer suppliers uphold their own standards of anti-slavery and human trafficking compliance. We review the statements from our manufacturing suppliers and the steps they are taking in relation to modern slavery. We will continue to check them regularly.

We also identify the following services within our supply chain

- Cleaning Services
- Supply of Non Genuine Parts and Tyres
- Office and Print Supplies
- Advertising Services
- Provision of finance related to the sale of motor vehicles

These non-manufacturer suppliers comprise a very small proportion of our supply chain, but we consider them to be at a higher risk of potential breaches of the modern slavery obligations. We will continue to consider whether it is proportionate to take further steps to ensure these non-manufacturer higher risk suppliers comply with our values on anti-slavery and human trafficking.

STEPS FOR THE PREVENTION OF MODERN SLAVERY

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Commonwealth Modern Slavery Act 2018. We expect the same high standards from all of our contractors, suppliers and other business partners.

All employees have an obligation to familiarize themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employee obligations under their contract of employment.

To strengthen our modern slavery governance, we have established a due diligence programme and we regularly review our existing suppliers through this programme by:

- Broadly mapping the supply chain to assess particular product, service or geographical risks of modern slavery and human trafficking;
- Creating a risk profile for non-manufacturer suppliers;
- Monitoring the modern slavery statements issued by each new supplier and all suppliers on a regular basis, and evaluating the modern slavery and human trafficking risks.

Whilst recognizing our statutory obligation to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the code of conduct of individuals and organisation's within our supply chains. However, we communicate with our suppliers in such a way as to convey to them our Anti-Slavery and Human Trafficking Policy and to gain and understanding of the measures they have taken to ensure modern slavery is not occurring in their businesses.

RELEVANT POLICIES

The following policies are integral to our continued dedication to identify modern slavery risks and prevent slavery and human trafficking in its operations:

Whistleblowing Policy

We encourage all its employees, workers, contractors, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. The whistleblowing procedure is designed to be easy for individuals to make disclosures in confidence and without fear of retaliation. The Company also encourages members of the public or people not employed by us to write, in confidence to the Managing Director or the Human Resources Director via our registered head office to raise any concern, issue or suspicion of modern slavery in any part of our business or supply chain.

Employee Code of Conduct

Our code clarifies the principles, actions and behaviours expected of our employees, workers and contractors when they represent the Company. This code is reviewed periodically and all updates are communicated to our employees and workers as they happen.

Supplier Code of Conduct

Suppliers are required to demonstrate that they uphold the Company's values of integrity, transparency, teamwork and professionalism and specifically that they provide safe working conditions and act ethically and within the law in their use of labour.

SAFEGUARDS

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising concern. The company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process far less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Employee Safeguards

All employees are paid under either the Vehicle Repair, Services and Retail Award 2020 or the Clerks Private Sector Award 2020. We also comply with Occupational Health and Safety Act 2004 to ensure employee safety. Our Workplace bullying and Modern Day Anti-Slavery policies are displayed in each department of the Rex Gorell Family Group. Both these policies interlock employee rights and protection.

RESPONSIBILITY FOR THE POLICY

Ultimate responsibility for the prevention and prevention of modern slavery rests with the Rex Gorell Family Group leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery.