

The logo graphic consists of three overlapping, rounded, wavy shapes in shades of orange and red, creating a sense of movement and growth. The word "LeasePlan" is written in white, sans-serif font across the middle of these shapes.

LeasePlan

2020 Modern Slavery Statement

LeasePlan Australia Limited

ABN 57 006 923 011

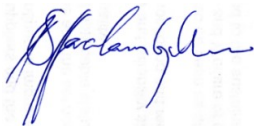
2020 Modern Slavery Statement

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) by LeasePlan Australia Limited (ACN 006 923 011) (**LeasePlan, we, us, our**) for the year which ended 31 December 2020 (**Reporting Period**).

We are committed to ethical business conduct and contributing to the global efforts to eradicate modern slavery. This statement outlines the modern slavery risks identified through our assessment of our operations and supply chain, our approach to addressing those risks and how we plan to assess the effectiveness of our actions going forward.

LeasePlan operates in a complex, international regulatory environment with local and international compliance obligations and may not be able to respond on a case-by-case basis to your concerns regarding modern slavery. Despite this, we share your concerns and commitments to compliance in relation to modern slavery regulations and ethical standards. As such, we encourage you to read this statement to determine the level of modern slavery risk associated with the services we provide.

This statement was approved by the board of LeasePlan Australia Limited on 24 June 2021.

A handwritten signature in blue ink, appearing to read 'Spiro Haralambopoulos', is written over a light blue grid background.

Spiro Haralambopoulos
Managing Director
25 June 2021

1. Structure, Operations and Supply Chain

Structure

LeasePlan is incorporated in Australia with its registered office located at Level 7, 30 Convention Centre Place, South Wharf, Victoria 3006.

LeasePlan is an unlisted public company incorporated in Australia in 1988. We are a provider of vehicle leasing and fleet management services.

As of the date of approval of this statement, LeasePlan employs 374 employees, of which 25 are fixed-term and the remainder permanent employees, with offices in Melbourne, Sydney, Brisbane, Adelaide, Perth and Hobart, and manages more than 90,000 vehicles for corporate, government and small business customers across all industry sectors.

LeasePlan is a wholly-owned subsidiary of LeasePlan Corporation N.V (**LeasePlan Corporation**). LeasePlan Corporation is one of the world's leading fleet management and driver mobility companies, with approximately 1.8 million vehicles under management in 32 countries.

LeasePlan has no subsidiaries of its own. Accordingly, it was not necessary for us to address the mandatory reporting criteria requiring every statement to "describe the process of consultation with any entities the reporting entity owns or controls".

Operations

LeasePlan is a provider of vehicle leasing (including novated leases) and fleet management services to corporate, government and small business customers across all industry sectors. We manage more than 90,000 vehicles for our customers Australia-wide.

Our core business involves managing the entire vehicle life-cycle for our customers, taking care of everything from purchasing, insurance and maintenance to car re-marketing. LeasePlan's Car-as-a-Service business purchases, funds and manages new vehicles for its customers, providing a complete end-to-end service for a typical contract duration of three to four years. Our mission is to provide innovative, sustainable vehicle leasing solutions so our customers can focus on what's next for them.

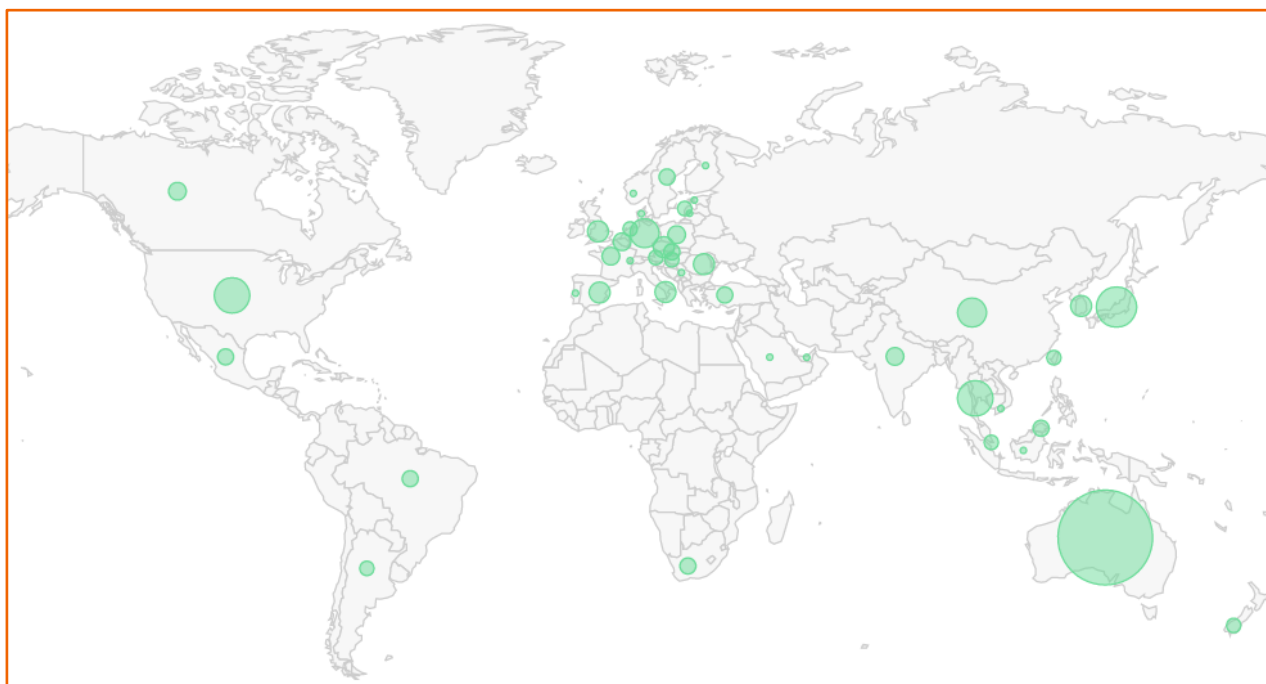
Our operations are located, and take place, entirely in Australia.

Our supplier base contains a mixture of short term and longer term business relationships. Our longer term business relationships are predominantly subject to written contracts, however, we transact with a number of suppliers on an ad hoc basis.

Supply Chain

Our supply chain includes vehicle manufacturers, importers and vehicle transporters, dealers, traders and distributors, fuel management companies, service maintenance and repair suppliers, tyre suppliers, accident and rental management companies and suppliers in other supporting areas such as IT, procurement, professional services and marketing.

The majority of our suppliers are located in Australia with some IT support procured from suppliers located in Singapore, USA, UK and Germany. We also procure motor vehicles and fuel from domestic suppliers with operations located internationally. The geographic footprint of the suppliers assessed is shown below:



2. Risks of Modern Slavery in our Operations and Supply Chain

In our operations

Based on an initial risk assessment of our industry, country of operations and the policies and procedures we have in place in respect of our workforce, we consider the risk that the risk of modern slavery in our operations to be low.

All new employees are subject to police checks and all non-permanent residents are subject to Visa Entitlement Verification Online (VEVO) checks prior to employment.

We are transparent in managing the remuneration of our employees. In order to ensure employees are remunerated in a fair and equitable way, LeasePlan bases remuneration on the duties and responsibilities of

each position. The remuneration range for a position is based on market positioning as determined by external advisors. Any decision to remunerate outside that range requires authorisation from the director of our human resources department.

We conduct our business in accordance with LeasePlan Corporation's code of conduct as well as other global and local policies. The following policies address human rights and ethical employment practices:

- Anti-Discrimination, Bullying and Harassment Policy
- Corporate Social Responsibility Policy
- Domestic Violence Policy
- Health & Wellbeing Incentive Policy

We also have a number of policies that set out in a transparent manner our employees' rights to remuneration and a safe working environment. These policies include:

- Fair Treatment Policy
- Flexible Working Policy
- Leave Policy
- Occupational Health and Safety Policy
- Overtime Policy
- Recruitment Policy
- Remuneration Policy
- Performance and Disciplinary Processes Policy

In our supply chain

In order to better understand the risks of modern slavery in our supply chain, we issued a modern slavery questionnaire (**MSQ**) via a third party platform to suppliers that provided goods and/or services to us during the Reporting Period. More information in relation to the MSQ process is outlined under Part 3 of this statement.

Through our screening process of our supply chain we identified that the potential for exposure to modern slavery exists in the following industries:

- Manufacturing
- Electricity, Gas, Water and Waste Services
- Construction
- Retail Trade (Fuel Retailing)
- Transport, Postal and Warehousing
- Information Media and Telecommunications
- Repair and Maintenance

Further to the above list, as with many businesses of similar scale and sector to ours, we have inherent risks of modern slavery in the office supplies we purchase, IT hardware, telecommunications equipment, corporate merchandise, facilities management, travel and catering.

The top six countries where our suppliers have business operations are: Australia, Japan, US, Thailand, Germany and China. The Global Slavery Index and other studies have reported on increased modern slavery risks in certain countries around the world. Through the MSQ process, we identified that some of our suppliers operate in higher risk countries such as China, India, Indonesia, Mexico, Saudi Arabia, Turkey, South Africa, Thailand and Vietnam. Within the later tiers of our supply chain, there are modern slavery risks

in connection with the electric vehicles and IT hardware that we purchase. We have become aware of these risks from various media reports that have been published in recent years. Electric vehicle, laptop and smart phone batteries require minerals such as cobalt and lithium that have been associated with poor mining practices and human rights abuses.

Motor vehicles form a large component of our annual procurement spend. In the automotive sector, there have been reports of labour rights abuses concerning freedom of association/union rights, living wage and forced labour (in manufacturers and their supply chains). Raw material sourcing deep in the supply chain of automotive companies has also been scrutinised.

3. Actions Taken to Assess and Address Risks

In our operations

As noted in Part 2 of this statement, we have a comprehensive policy framework. During the Reporting Period, we worked to enhance our existing policy framework by:

- Agreeing to introduce in the next Reporting Period a Human Rights Policy formalising our commitment to respecting human rights in our operations and our supply chain
- Undertaking a gap analysis of our policy suite which resulted in revisions to some of our existing policies to take into account human rights considerations

Our employees are required to complete online training to familiarise them with recent developments in modern slavery law in Australia and highlight how these developments affect us as a purchaser of goods and services.

Our Whistleblower Protection Policy sets out the mechanisms by which our employees can raise grievances. The policy includes protections for the whistleblower's confidentiality, as well as preventing their victimisation. No complaints related to modern slavery were reported via our whistleblower channels during the Reporting Period.

We are committed to providing effective remedies where our operations cause or contribute to adverse human rights impacts. Our approach to remediation is to engage directly with affected persons, and work with our business partners and other stakeholders to remediate any such impacts and consider how our internal processes can be improved to prevent similar impacts in the future.

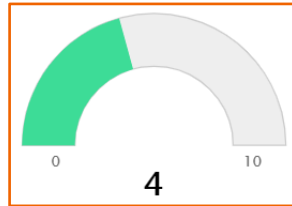
In our supply chain

As noted in Part 2, we recognised the need for an informed and structured risk assessment in order to determine our supply chain priorities and respond appropriately. The UN's Guiding Principles on Business and Human Rights recognises that prioritisation of risk is often essential for companies with extensive supply chains. We determined that the MSQ approach was the most appropriate means by which to undertake our risk assessment. The MSQ was sent out via a third party SAP cloud-based platform operated by ethiXbase. The MSQ was designed with five key risk areas in mind:

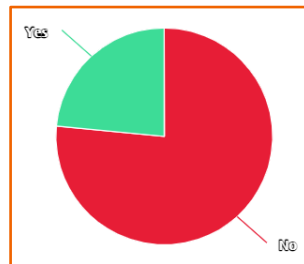
- Country of origin risk
- Industry/product risk
- Utilisation of vulnerable workers
- Prior human rights impact assessment
- Implementation of policies, procedures and systems

The MSQ features automated analytics that generates a modern slavery risk rating (high, moderate and low) for each supplier based on responses to the weighted questions. The datasets underpinning the analytics are driven by global indices on modern slavery and human rights risks.

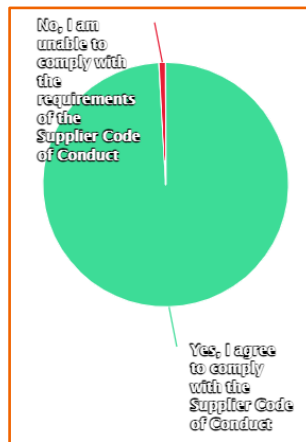
The average modern slavery risk rating based on the responses we received was 4 out of 10, resulting in an overall low risk average.



The majority of the suppliers who responded had not undertaken a human rights impact assessment as shown in the graph below. This was to be as expected, given this was the first reporting year for the Australian Modern Slavery Act.



The majority of the suppliers who responded also confirmed that they complied with the requirements of our Supplier Code of Conduct which requires our Supplier to respect the human rights as stated in the United Nations' Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact and the Principles of the International Labour Organisation.



A breakdown of the modern slavery risk ratings of those who completed the MSQ is as follows:

- Low: 64%
- Moderate: 35%
- High: 1%

One supplier operating in the motor vehicle retail, motor vehicle parts retailing and repair and maintenance sector received a high risk rating due to the following high risk areas shown in red below. The orange risk denotes a moderate risk profile:



The suppliers that received a moderate risk rating largely due to their industry risk profile for sectors such as retail trade, postal, transport and warehousing, construction and manufacturing. However, their high sector risk was mitigated by having controls, codes and policies in place.

While no modern slavery was identified through the MSQ process, it has brought to our attention the suppliers with whom we need to engage for further due diligence in our second reporting period.

Supplier engagement

We are mindful of the need to choose our business partners well, carry out appropriate due diligence before commencing a contractual relationship, and remain alert to the indicators of modern slavery throughout our dealings.

Before entering into a business relationship with a supplier, LeasePlan first conducts due diligence in respect of the prospective supplier to determine:

- Its ultimate beneficial ownership
- Whether any politically exposed persons are involved in the management of, or ultimately own, the supplier
- Whether the supplier is subject to any adverse media reports

The prospective supplier is then screened against sanctions and anti-money laundering lists, as necessary, in accordance with the policies of our parent entity, LeasePlan Corporation. These existing due diligence processes will be complemented by requiring prospective suppliers to complete the MSQ.

Where possible, we engage suppliers under our standard terms and conditions. These terms and conditions require our suppliers to meet a number of minimum standards, including with respect to applicable work health and safety laws and regulations. During the Reporting Period, we agreed to introduce in the next Reporting Period modern slavery obligations as part of our pro forma terms.

4. Describe how each entity assesses the effectiveness of its actions

In our first year of reporting under the *Modern Slavery Act 2018* (Cth), our focus has been to establish processes to identify and address the modern slavery risks in our operations and supply chains. During the course of the second reporting period, we plan to assess the effectiveness of the measures we have taken by tracking our performance against the following goals:

- Sharing our Modern Slavery Statement with suppliers as a way of communicating the importance we place on addressing modern slavery risks in our business and supply chain
- Rolling out modern slavery training to the majority of our people across Australia and
- Include modern slavery considerations as part of the procurement RFT process

5. Other relevant information

Through LeasePlan Corporation's participation in the Global Battery Alliance, convened by the World Economic Forum (LeasePlan Corporation is a founding member of its Battery Passport Initiative), and in cooperation with key supply chain participants, LeasePlan Corporation is in discussions on how best to tackle human rights abuses, and that sustainable mining practices and traceability are embedded in battery manufacture.