



# Modern Slavery & Human Trafficking Statement - FY 2021

MAXXIA GROUP

Revision	Author	Approved	Date	Details of Change
1.3	MMT	Approved	15/12/21	Approved by ML Board



## Modern Slavery & Human Trafficking Statement

### 1 Introduction

- 1.1 The Maxxia Group of companies in the UK (Maxxia Group) is opposed to slavery in all its forms, including: slavery; servitude; forced labour; human trafficking; deceptive recruiting for labour or services; debt bondage; forced marriage; and child labour.
- 1.2 This statement sets out the actions that we have taken to assess and address modern slavery and human trafficking risks in our operations and supply chains during the financial year ending 30th June 2021.
- 1.3 This statement should be read in conjunction with the McMillan Shakespeare Group Modern Slavery Statement, available [here](#).

### 2 Corporate Structure, Operations and Supply Chains

#### 2.1 Structure and Operations

Maxxia Group in the UK consists of:

- Anglo Scottish Asset Finance Limited
- Maxxia Finance Limited
- Maxxia Limited (the reporting entity)
- CLM Fleet Management PLC

These companies provide asset finance broking and vehicle fleet management services to Maxxia Group customers in the United Kingdom. The parent entity of Maxxia Group, McMillan Shakespeare Limited, is listed on the Australian Stock Exchange (ASX) and its head office is in Melbourne, Australia employing over 1,300 people, with operations across Australia, New Zealand and the United Kingdom, as well as a small software development office located in Wuxi, China.

#### 2.2 Supply Chain

Our supply chain is divided into two main areas:

2.2.1 Funding and business procurement to provide services to our clients and customers, including:

- Facilitation of funding through financiers,
- Purchase of vehicles through dealer distribution network
- Remarketing of off lease assets
- Provision of Accident Management and Roadside Assistance services through national providers
- Provision of vehicle servicing and maintenance through repairer networks, including the acquisition of tyres from distributors.

2.2.2 Suppliers that provide goods and services to support our corporate functions, including:

- IT-related services
- Merchandise, uniforms and marketing materials
- Stationery, office supplies and furniture,
- Legal, financial and professional services
- Events and catering
- Facilities management services including office cleaning and waste disposal
- Postage and couriers.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

### 3 Modern Slavery Risks

During the year, MMS Group conducted a modern slavery risk assessment to identify areas within its operations and supply chains where risk of modern slavery practices may be present. Modern slavery risks were assessed through two lenses:

- The inherent risk in each operational or procurement category, which considered various sources of modern slavery risk, such as geographic risk, sector and industry risk, product and service risk, and entity risk; and
- The opportunity to mitigate modern slavery risks, which considered the level of influence MMS Group may have to work with our suppliers and business partners to address modern slavery risks.

The risk assessment drew on credible publicly available resources, including the United Nations Guiding Principles on Business and Human Rights, Financial Services and Modern Slavery Report by the Australian Human Rights Commission and KPMG, the Global Slavery Index by the Walk Free Foundation. Risk ratings and outcomes were discussed and validated by MMS senior management through an internal workshop.

Outcomes of this risk assessment relevant to the UK are summarised below.

#### 3.1 Operations

Examination of our operational activities as part of the risk assessment revealed that the risk of Maxxia Group causing, contributing to or being directly linked to Modern Slavery practices within our operations (i.e. related to our directly employed workforce or the provision of products and services) is low. This is due to the fact that our employees and customers operate primarily within the UK, and therefore considered low risk with regard to child labour, forced labour, or other modern slavery practices.



Maxxia Group has a robust system of HR policies and procedures to ensure compliance with UK legislation including confirming an individual’s right to work in the UK and maintaining a safe, healthy and inclusive workplace.

### 3.2 Supply Chains

Maxxia Group recognises that it may have elevated exposure to the following risks of Modern Slavery practices through its supply chains:

- Procurement of specific products, for which the material extraction or production may involve modern slavery,
- Supplier operations in countries with weak commitments to human rights,
- Use of contract, low-skilled and/or migrant labour, and
- Subcontracting and use of third-party labour hire agencies.

Based on modern slavery risk factors, our assessment suggested the following categories as areas for focus.

Corporate procurement	Core business supply chain
<ul style="list-style-type: none"> <li>• Corporate merchandise and promotional goods</li> <li>• Uniforms</li> <li>• ICT related services (hardware, software and customer support)</li> <li>• Stationery, office supplies and furniture</li> <li>• Facilities management services</li> </ul>	<ul style="list-style-type: none"> <li>• Motor vehicle manufacture and raw materials</li> <li>• Fuel service providers</li> <li>• Vehicle maintenance and repair networks</li> </ul>

Outputs of this risk assessment has given Maxxia Group a view of its high-risk categories, allowing Maxxia Group to develop a staged approach to strengthening its due diligence activities and managing modern slavery risks in its supply chain. Our supplier engagement activities will initially focus will be on Tier 1 suppliers, those with whom Maxxia Group has a direct contractual agreement. In future years, Maxxia Group will expand its focus to explore risks within our Tier 2 suppliers (suppliers to our Tier 1 suppliers) and beyond.

## 4 Risk Mitigation

Informed by the risk assessment completed during the year, we have identified clear next steps in our journey to address modern slavery risks in the year ahead, outlined in section 6.



#### 4.1 Policies

To address these risks, the Maxxia Group will, during the 2021/22 financial year, review, develop and implement the following policies to assist in the identification and prevention of slavery and human trafficking in our operations:

- Modern Slavery Policy - this outlines the expectations Maxxia Group has of employees and suppliers in the UK with respect to addressing modern slavery risks within the UK.
- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. This policy is due for review and update this financial year.
- Code of Conduct - our code will be reviewed and updated to encourage employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.
- Purchasing Code - we will develop our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

#### 4.2 Template Contract Clauses

During the previous financial year, MMS Group developed template Modern Slavery clauses for contracts with suppliers. During 2021/22 Maxxia Group will review these for appropriateness for the UK and, where possible, apply them to new and existing contracts.

The clauses outline the Group's expectation of suppliers to review their supply chains for modern slavery and report any breaches to Maxxia Group. The clauses also provide Maxxia Group the right to audit the supplier in relation to compliance against Modern Slavery obligations.

#### 4.3 Due diligence of suppliers

Maxxia Group will develop due diligence procedures for suppliers which will be progressively applied to new suppliers and existing suppliers. This will include:

- Assessing risks in the provision of services
- Auditing the health and safety standards, labour relations and employee contracts of high-risk suppliers, where possible
- Requiring improvements to substandard employment practices
- Engaging with suppliers to improve their performance in line with our requirements and expectations

We will require all suppliers to attest that they meet the UK Modern Slavery legislation.



#### 4.4 Staff Training

Maxxia Group will raise awareness of modern slavery issues by providing access to the online training course “Tackling Modern Slavery” for relevant employees on joining and annually.

### 5 Other Relevant Information – COVID-19

COVID-19 continued to impact people across the UK and globally throughout the reporting period. Broadly, we observed that in our supply chain, COVID-19 has not had a significant impact on business activities and the ability to manage employees and modern slavery risks.

### 6 Assessing Effectiveness

Maxxia Group is committed to continually improving our processes and actions to address Modern Slavery risks in our operations and supply chain.

During financial year 2021/22 Maxxia Group will monitor the following indicators to understand the effectiveness of Modern Slavery risk mitigation actions:

- Number of contracts established with modern slavery clauses.
- Number of breaches reported through grievance mechanisms.
- Number of employees that complete modern slavery training.

As part of the risk assessment McMillan Shakespeare Group completed during the year it reviewed the controls in place and the opportunities available to strengthen their response.

Some of the key opportunities they identified include:

- Further strengthening of our policies, including the establishment of a human rights policy for the Group, and updating our Supplier Code of Conduct to clarify our expectations of suppliers with respect to due diligence and ongoing assessment.
- Developing a modern slavery risk mitigation plan, including actions to manage risks within high-risk categories.
- Developing and begin implementing a well-defined supplier due diligence process for both new and existing suppliers to assess modern risks, monitor performance and report on the effectiveness of actions on an ongoing basis.

Maxxia Group is working with the broader MMS Group to implement these opportunities for improvement across the UK operations in the coming years.



This statement covers the period from 1st July 2020 to 30th June 2021 and has been approved by the Board of Directors of Maxxia Ltd at their meeting on 15th December 2021.

Dave Mitchell

Maxxia Limited /Maxxia Finance Limited - Group Finance Director

John Lawrence

CLM Fleet Management PLC – Managing Director

David Foster

Anglo Scottish Asset Finance Limited – Managing Director