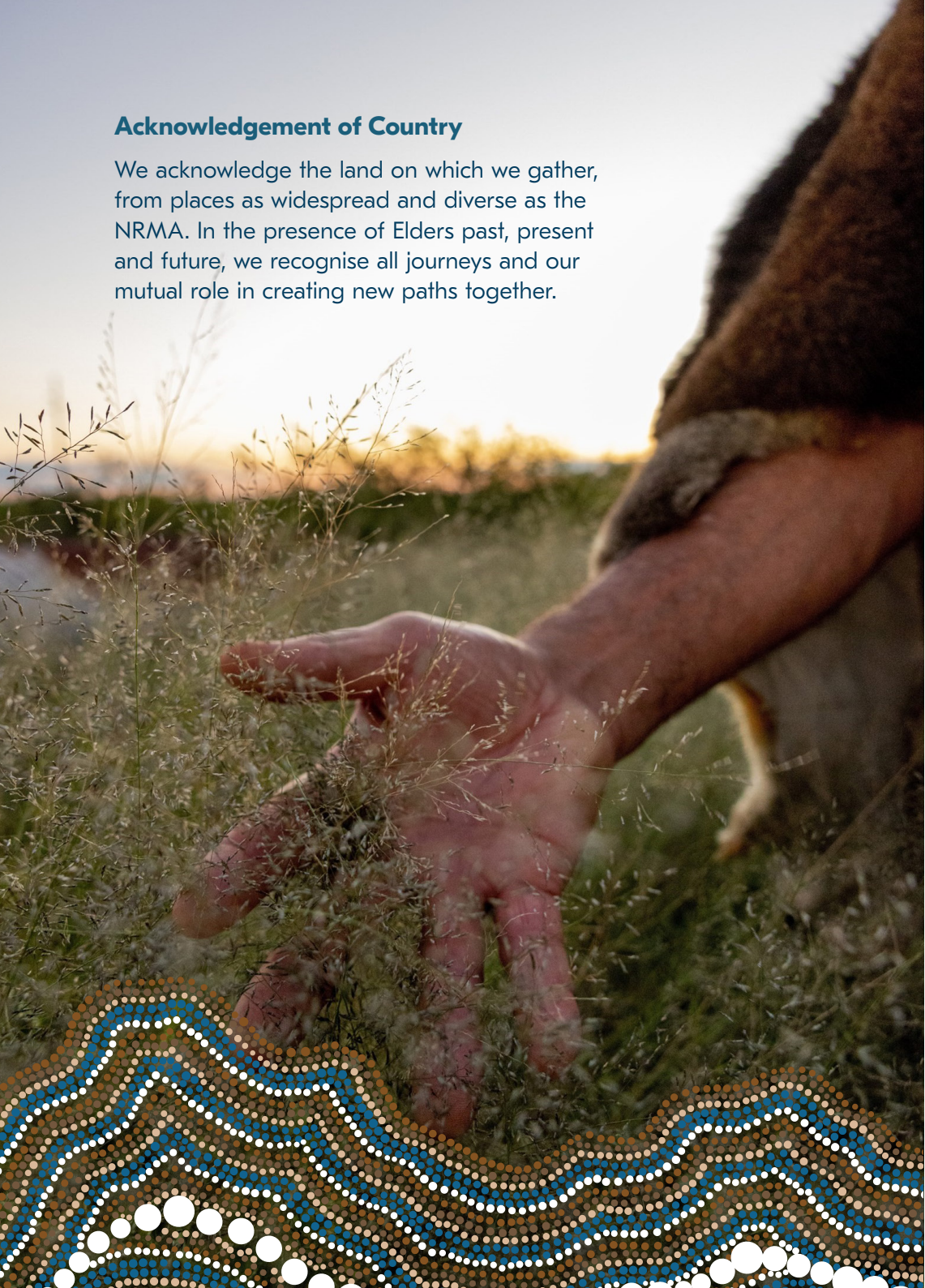


The NRMA Modern Slavery Statement 2024





Acknowledgement of Country

We acknowledge the land on which we gather, from places as widespread and diverse as the NRMA. In the presence of Elders past, present and future, we recognise all journeys and our mutual role in creating new paths together.

Mandatory Criteria

The NRMA's FY2024 Modern Slavery Statement has been prepared in accordance with the *Modern Slavery Act 2018 (Cth)* and the identified mandatory criteria.

Modern Slavery Criteria	Page/s
Signed on behalf of the Board of Directors	2
Identify the Reporting entity's structure, operations and supply chains	5 - 7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities it owns or controls.	8
Describe the actions taken by the reporting entity, and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	9 - 12
Describe how the reporting entity assesses the effectiveness of these actions	12
Describe the process of consultation with any entities the reporting entity owns or controls	13

This is the FY2024 Modern Slavery Statement ('Statement') for the NRMA. The Statement has been prepared in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*, (the 'Act').

This statement was approved by the Board of Directors of the NRMA at the Board meeting held on 28 August 2024.

Signed in accordance with a resolution of the Board of Directors.

Tim Trumper

Tim Trumper
NRMA Chair

28 August 2024

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A message from our Group CEO

As Group CEO of the NRMA, I reaffirm our unwavering commitment to respecting human rights and combatting the risks of modern slavery within our operations and throughout our supply chains. The NRMA understands that upholding human dignity and fostering a culture of ethical responsibility is a moral imperative and essential to sustainable business practices.

We recognise that slavery persists in many forms across the world, and are steadfast in our determination to play our part in helping to eradicate it. In order to achieve this goal, we strive to prioritise transparency, accountability and collaboration with our partners, employees, suppliers and stakeholders. We carefully monitor our own operations to ensure they meet the highest ethical standards, and are working to rigorously assess our supply chains, taking mitigating action where risks of slavery are identified.

Assessment of supply chains takes time, and we are mindful that rushing this process could undermine our efforts to effectively identify and address modern slavery issues. While we may not wield the same influence as larger corporations, our actions still carry significant weight. Our progress and efforts in conjunction with those of the wider business community can inspire broader industry shifts in the fight to eradicate slavery.

The journey is far from over but working together we believe we can build a better future for all.

Rohan

Rohan Lund
Group CEO
The NRMA



Our Commitment to Human Rights

The NRMA is committed to upholding and respecting Human Rights in all aspects of our business operations. We align our practices with the principles encompassed within the *United Nations Declaration of Human Rights* and the *United Nations Guiding Principles on Business and Human Rights*, and published our Group Human Rights Statement in 2024. We rigorously adhere to Australian employment legislation and take steps to identify and mitigate human rights violations in our supply chains through our Modern Slavery Working Group (MSWG).

1.0 Identifying the Reporting Entity – Structure Operations and Supply Chains

This NRMA Modern Slavery Statement 2024 ('the Statement') covers the activities of the National Roads and Motorists' Association Limited ACN 000 010 506 ('the NRMA') undertaken to understand and implement actions to minimise the risk of modern slavery in our operations and supply chains for the period 1 July 2023 to 30 June 2024.

Throughout the Statement the use of 'the NRMA' refers to the operational divisions of, NRMA Corporate, NRMA Motoring and Membership and the wholly-owned entities of; NRMA Marine, NRMA Parks and Resorts, and SIXT Australia.

1.1 Our Structure

The NRMA is a member-owned mutual, structured as an Australian public company limited by guarantee, operating in the travel, mobility, motoring, education, leisure and tourism sectors.





The NRMA includes the operational divisions of NRMA Corporate, NRMA Motoring and Membership and the wholly owned entities of NRMA Marine, NRMA Parks and Resorts and SIXT Australia.

The NRMA employs 3051 full, part-time, fixed term and casual staff.

The NRMA holds a number of investments which it does not control or manage operationally, in the form of equity and holdings in other Australian companies, and holdings in managed funds and joint ventures.

The NRMA is a shareholder of Australian Motoring Services Pty Ltd and Club Assets Pty Ltd which are owned by the various auto clubs of Australia, and deliver services and initiatives on behalf of the clubs on a national basis. We also have a joint venture with the owner of the Kurrajong Hotel in Canberra.

The NRMA Registered Office
Level 13, 151 Clarence Street
Sydney NSW 2000

Our Brands	Businesses and business functions	Employees
	<p>NRMA Corporate NRMA Membership and Motoring</p> <p>NRMA Corporate and NRMA Motoring and Membership provides key functions for the group. These include, legal services, policy and advocacy, technology services, investment services, member services, community programs, driver training, education, roadside assistance, advocacy, electric vehicle charging infrastructure and human resources.</p>	<p>1351 full, part-time, fixed term and contract staff.</p>
	<p>NRMA Parks and Resorts</p> <p>NRMA Parks and Resorts provides tourism and accommodation services across Australia</p>	<p>1011 full, part-time, fixed term and contract staff.</p>
	<p>NRMA Marine</p> <p>NRMA Marine provides commuter, tourism and leisure services in NSW, Tasmania and around the waters of Australia.</p>	<p>461 full, part-time, fixed term and contract staff.</p>
	<p>SIXT</p> <p>NRMA Group directly operates vehicle rental services at 72 out of 164 SIXT locations across Australia, and acts as franchisor in relation to the remainder.</p>	<p>542 full, part-time, fixed term and contract staff.</p>

1.2 Our Operations

The NRMA provides services to over 3.1 million members across Australia. These services include; tourism and leisure, electric vehicle fast charging, member benefits, driver training, roadside assistance, marine commuter and leisure services, advocacy, vehicle rental and road safety education.

All our operations are based in Australia however SIXT Australia utilises the services of one offshore call centre based in the Philippines for its Australian operations.

The following outlines the operations carried out by the NRMA and its controlled entities.

<p>NRMA Corporate</p> <p>Main operations (corporate controlled functions)</p> <ul style="list-style-type: none"> • Finance and asset management • Technology and data • People, organisational culture and OHS • Governance • Reconciliation Action Plan • Environment, Social and Governance (ESG) • Strategy • Community programs • Marketing, branding and design • Advocacy, community programs and partnerships 	<p>NRMA Membership and Motoring</p> <p>Main operations</p> <ul style="list-style-type: none"> • Roadside assistance • Driver training • Road safety education • Member services and member benefits • EV charging infrastructure • Marketing services • Australian Call Centres • Car batteries – supply and install • Member Communications and Open Road magazine • Member benefits
<p>NRMA Parks and Resorts</p> <p>Main operations</p> <ul style="list-style-type: none"> • Tourism and accommodation services at locations across Australia • Tourism Park management services 	<p>NRMA Marine</p> <p>Main operations</p> <ul style="list-style-type: none"> • Tourism and leisure services • Commuter ferry services
<p>SIXT</p> <p>Main operations</p> <ul style="list-style-type: none"> • Car and truck rental services across Australia • Ancillary item rentals • Offshore call centre 	<p>Investments</p> <p>A diversified investment portfolio across a wide variety of asset classes including equities, property, infrastructure, private equity, fixed income and cash assets.</p>

Non-controlled entities

Participation in Motoring Organisations

The NRMA exercises a significant influence in the following non-controlled entities which are owned by various auto clubs in Australia and deliver initiatives and services on behalf of these clubs.

Australian Motoring Services Pty Ltd

Provides motoring and travel assistance services.

Club Assets Pty Ltd

Club Assets Pty Ltd through its 75% ownership of Club Assist Corporation Pty Ltd provide motoring assistance services including the supply of batteries.



1.3 Our Supply Chains

The Modern Slavery Working Group (MSWG) have assessed our primary supply chains across all our businesses and wholly owned entities, identifying and classifying their category and risk level. Additionally, we have identified what we believe our level of leverage over suppliers to be, based on our purchasing power. The leverage we hold drives our actions and approaches to mitigating modern slavery risks.

	Corporate	Membership and Motoring	SIXT	Marine	Parks and Resorts	Leverage
Uniforms and work attire						Medium
Technology hardware						Low
Cleaning services						Medium - Low
Office/business consumables and promotional merchandise						Low
Tyres						Medium - Low
Solar panels						Low
Batteries						High
Printing, publishing, paper supply						Low
Software						Medium
Vehicles and vessels						Medium
Call Centre Philippines						Medium - High
EV charging infrastructure						Medium
Building and refurbishment						Low
Windscreens						Medium
Contractors and subcontractors						High
Security services						Low - Medium
Professional services						High
Catering, Food and Beverages						Medium - High
Travel						Medium - Low
Utilities						Medium
Landscaping services						Medium - High
Advertising and Marketing						Medium
Furniture and fittings						Medium
Fuel, maintenance and spare parts						Medium
Community partners						High
Managed investments						Low

Legend:

High perceived risk of modern slavery within supply chain

Medium perceived risk of modern slavery within supply chain

Low perceived risk of modern slavery within supply chain

2.0 The risks of modern slavery in our operations and supply chains

2.1 Operations

Services to NRMA members and customers are generally provided by our group employees. We rigorously oversee and monitor full, part-time and casual employment conditions across all our businesses. Compliance with Australian legislation pertaining to employee work conditions forms part of our Risk Appetite Statement and we have zero tolerance for non-compliance.

The NRMA Group has in place a range of policies that protect against human rights violations within our operations. This includes the NRMA's Group Human Rights Statement which sets forth our commitment to Human Rights, both in our operations and across our supply chains. Human rights violations within our operations are monitored by the Ethics Advisory Committee, Human Resources and the Modern Slavery Working Group (MSWG).

To ensure we are able to identify any issues across our operations we have an externally hosted Speak-Up Hotline. This anonymous platform is open to employees, ex-employees, contractors, suppliers and associates and their employees to raise actual or suspected concerns without fear of intimidation, disadvantage or detriment. Concerns raised are reviewed in confidence by the Ethics Advisory Committee who direct and take appropriate remedial action. In addition to our Speak Up Hotline we also undertake regular anonymous employee surveys. These surveys provide a platform for our people to raise any concerns and are acted upon by our Executive Leadership Team.

2.2 Supply Chains

We are aware that the products and services we procure to service NRMA members and customers will likely cause us to be directly linked to modern slavery practices. The majority of our goods and services are purchased from Australian suppliers or intermediaries. While Australia has a comparatively low risk of modern slavery there are identified high risk industries, risks associated with imported products and within complex global supply chains. Modern slavery due diligence is undertaken by our MSWG. The MSWG is comprised of senior leaders from our group businesses, procurement and specialist personnel. The MSWG is led by our Group CFO who reports on our progress to the NRMA Audit and Risk Management Committee and the NRMA Board of Directors.

Risks are assessed against industry, geographic, and product/service risk. Information regarding these risks is obtained from research undertaken by the MSWG and our suppliers. Based on this assessment, we identify high, medium and low risk supply chains which are then classified by tier, which is equated to spend and regularity of purchase. The MSWG is responsible for undertaking due diligence on our suppliers and their supply chains in order of priority (high through to low risk). This process involves identifying vulnerabilities throughout supply chains, supplier liaison, obtaining more detailed information and remedial actions to mitigate risks.

Of key support to managing our modern slavery risk is the NRMA's group procurement policy. All purchases over a designated amount must have a duly signed contract which includes stipulations with respect to modern slavery. All contracts are managed by the NRMA procurement team whose leaders are members of the MSWG and play a vital role in our supplier due diligence. The risks of modern slavery are called out in our group procurement policy. To further assist our employees, the policy includes a list of our identified high risk supply chains. Where employees identify a purchase as high risk they must immediately engage their procurement lead regardless of spend. This ensures that modern slavery due diligence processes are followed.



3.0 Actions taken to assess and address modern slavery

Our MSWG analyse modern slavery questionnaire responses utilising the latest available information and seek further information and clarification where risks are identified. The criteria used for assessment is as follows:

Risk to the NRMA



Geographic risk

Goods and/or raw materials procured from countries identified as having a high risk of modern slavery.



Industry sector risk

Industry has been reported as having a high risk of modern slavery.



Product & services risks

Products and services that may have high risks of modern slavery because of the way they are produced, provided or used.

The following matrix provides a breakdown of NRMA suppliers by identified risk level and tier

Priority 1

HIGH RISK	TIER 1	TIER 2	TIER 3
Total Spend	9.66%	0.20%	0.27%
Suppliers	0.50%	0.24%	1.22%

Priority 2

MEDIUM RISK	TIER 1	TIER 2	TIER 3
Total Spend	14.18%	5.21%	3.09%
Suppliers	1.50%	1.48%	3.93%

Priority 3

LOW RISK	TIER 1	TIER 2	TIER 3
Total Spend	61.53%	7.96%	8.16%
Suppliers	8.12%	5.22%	85.34%

The NRMA takes a group-wide approach to modern slavery. Our MSWG follows our modern slavery due diligence process to identify and mitigate risks of modern slavery in our supply chains, working collaboratively across business units to share knowledge and resources. At the commencement of each year the MSWG meet to determine the agreed plan of works for the next year. The MSWG achieved a number of milestones in 2024.

We launched our general employee online training and information pack which provides an overview of modern slavery, the risk to our business and explains what actions our employees can take to assist us in mitigating risks. We also undertook a review of our Request for Proposal (RFP) and supplier on-boarding process. The aim of the review was to streamline our processes and ensure our expectations regarding human rights were fully integrated in the RFP process. This will assist our modern slavery due diligence process by obtaining more detailed information prior to contract award. The review has now been completed and is slated for implementation in 2025. We continually review our due diligence process to ensure it meets our needs, and closely monitor our Speak Up Hotline and other employee and member communication channels to ensure they capture human rights violations including modern slavery.

As a mutual with a remit to support Australia, and Australian businesses, we procure goods and services locally wherever possible. We have thousands of suppliers across Australia and many are small businesses located in regional and remote areas. Most of these businesses have limited knowledge of modern slavery or the Act, and this year we focused attention on working with our small cleaning and laundry suppliers to better inform them of the purposes of the Act and our obligations.








Challenging the MSWG in FY2024 was the acquisition of a number of new parks and resorts across Australia. This resulted in an additional 733 new suppliers, with some representing new goods and/or services categories. Our Membership and Motoring Division also acquired 40 new suppliers. The MSWG is in the process of researching, classifying and on-boarding these new suppliers into our system.



3.1 High Risk Suppliers

The MSWG continues to work with our identified high risk suppliers, meeting with them and auditing available annual modern slavery statements, responses to questionnaires, and additional information requested. Our actions are determined by the level of leverage we hold over suppliers. Where our leverage is low we are investigating whether suitable industry bodies exist that are taking steps to address modern slavery in their sector. If appropriate we are mandating that suppliers are members.


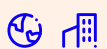
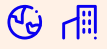
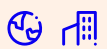





Category: High Risk	Risks	FY2024 Update and Actions
Tyres 	Forced labour Bonded labour	To mitigate our risks we have mandated that all tyre purchases be made through suppliers who are members of Tyre Stewardship Australia.
Uniform & work attire 	Forced labour Bonded labour	Ongoing reviews of offshore manufacturing audit reports where available. Ongoing liaison with nominated suppliers. Investigating raw material supply locations and risk assessment. We have identified geographic risks in some raw material supply and will work on mitigating this risk in the future.
Solar panels 	Forced labour	Further research on risks across our current supply chains and identification of best practice suppliers is underway.
Information technology hardware/electronics 	Child labour Forced labour Bonded labour	We continue to monitor hardware manufacturers' modern slavery statements and actions (where available) and raise any concerns with suppliers.
Office consumables and promotional merchandise 	Forced labour Bonded labour	Meet regularly with our supplier to better understand their risks and their mitigating actions.
Cleaning services 	Bonded labour	Across our breadth of locations the NRMA relies on multiple small local operators to fulfil our cleaning and laundry needs. This supply chain is classified as high risk due to low visibility and the frequent use of unskilled or migrant labour. Most of these suppliers are small businesses with limited knowledge and understanding of modern slavery, the Act and our requirements. The MSWG has spent considerable time this year working with these suppliers to assist them in understanding the Act's intention and our expectations and obligations.
Batteries 	Bonded labour	As a part owner, and Board member the NRMA exercises significant leverage over our battery supplier Club Assist to mitigate the risks of modern slavery. We meet with them regularly and are kept abreast of their progress. Club Assist are mandatory reporters under the Act.

3.2 Medium Risk Supply Chains

The MSWG are commencing a more detailed review of our identified medium risk supply chains. This work is time intensive, ongoing and complex. It will include not only reviewing available modern slavery statements and questionnaire responses but also research and supply chain mapping to better understand the risks - from raw material to supply. We expect that as this process proceeds we will identify new high risk categories. Our identified medium risk supply channels and actions to date are as follows:



Category: Medium Risk	Risks	FY2024 Update and Actions
Software 	Bonded labour	The use of bonded labour has been identified in the development of software in some locations. The NRMA purchase proprietary software in accordance with our business needs, and from time to time utilise the services of global technology companies to assist with NRMA specific software development. Our main suppliers have zero tolerance for human rights abuses and are all mandatory reporters under the Act. Their statements are reviewed annually and any questions and concerns brought to their attention.
Vehicles and Vessels 	Forced labour	The NRMA and its wholly owned entities purchase vehicles and vessels to service our fleet needs. A report by Sheffield Hallam University on 'Automotive Supply Chains and Forced Labour in the Uyghur Region' found that many vehicle manufacturers were exposed to forced labour through raw material production and parts manufactured in China. All vehicle suppliers used by the NRMA are mandatory reporters under the Act. We continue to monitor the sector, our suppliers' modern slavery statements and questionnaire responses, seeking additional information where required. No vessels were purchased in FY2024.
Off shore call centres 	Bonded labour	The NRMA's wholly controlled entity SIXT has operated an off-shore call centre in the Philippines for a number of years. The MSWG and SIXT management have undertaken a review of their policies and practices and have found no evidence of modern slavery. The company adheres to all local employment legislation and the SIXT team visit regularly and are free to speak and engage with call centre members at any time.
EV charging infrastructure 	Forced labour Bonded labour Child labour	<p>The NRMA purchase EV charging infrastructure to service the needs of our expanding EV charging network across Australia. EV charger supply chains are complex and global. To assist in mitigating the risks, the NRMA in accordance with our due diligence processes undertook an assessment of possible suppliers' human rights and modern slavery due diligence processes prior to selecting a preferred supplier.</p> <p>The nominated supplier has in place a rigorous human rights due diligence process which includes desktop research, site visits and the commissioning of third party reports to identify and mitigate the risks of modern slavery in their supply chains. Their work focuses attention on high risk locations and industry segments and has successfully identified instances of modern slavery and taken remedial action. They also work closely with suppliers to address non-compliance and improve performance.</p>
Building and refurbishment 	Forced labour Bonded labour	<p>The NRMA undertakes building and refurbishment works across our premises. All work is undertaken by Australian companies and contractors. Based on our initial research we believe that risks are most likely found in some raw material supply.</p> <p>Our action to date is limited to reviewing available questionnaire responses and modern slavery statements.</p>
Paper, printing and publishing 	Forced labour	The MSWG have reviewed our preferred supplier's modern slavery statement and their responses to our questionnaire. Our preferred supplier is a member of SEDEX (Supplier Ethical Data Exchange) which enables them to better manage the risks identified deep within their supply chains.
Windscreens 	Forced labour Bonded labour Child labour	The MSWG undertook a deep dive on windscreen supply chains – please refer case study on page 12.

3.3 Low Risk Supply Chains

At this stage our work in this area has been limited to classification, on-boarding of some suppliers in our system and modern slavery questionnaire dissemination where appropriate. As most of these suppliers are small businesses with no requirements under the Act we are also providing all newly on-boarded suppliers with our modern slavery information pack which explains our obligations under the Act.

CASE STUDY Medium Risk – Windscreens

The NRMA provide windscreen replacement services to members and regularly replace windscreens in our SIXT rental fleet. The procurement of windscreens is classified as a medium risk. Modern slavery issues identified in windscreen supply can include forced, child and bonded labour, and hazardous working conditions. Raw material extraction, labour-intensive manufacturing, subcontracting, and employment of migrant workers may exacerbate modern slavery risks.

In FY2024 the NRMA tendered for preferred suppliers. In accordance with our due diligence process a key component of the tendering process was review of all tenderers' modern slavery programs to ensure that preferred tenderers were taking steps to minimise and mitigate their modern slavery risks. It was evident during the tendering process that one supplier had proactively assessed and mitigated perceived risks by engaging a specialist consultancy to undertake a detailed review of their supply chains. Subsequent to the review the company ensured that identified high risk procurement areas were closely monitored by their parent company's sustainable procurement team. This team undertakes regular audits of global glass manufacturers and suppliers identifying key indicators of modern slavery and taking appropriate action. Additionally they have a proactive approach to onboarding their suppliers to ensure effective management of modern slavery risks. On this basis they were successful in gaining a contract and we continue to liaise with them to keep abreast of their actions with respect to risks.

4.0 Assessing the effectiveness of our actions

Respect for, and protection of human rights is critical to our commitment as a mutual to build safe and equitable communities. We monitor our effectiveness in addressing and mitigating violations in accordance with the *UN Guiding Principles on Business and Human Rights*. Human rights violations are defined as a risk to the NRMA Group. As such we have processes and procedures in place which are closely monitored to ensure they are effective in identifying and managing risks that the NRMA may cause, contribute to, or be directly linked to human rights violations including modern slavery.

To ensure we manage risks within our own operations we update all our recruitment, employment and group policies on a regular basis and our leadership team ensure they are stringently adhered to by the NRMA Group. We have in place an anonymous Speak Up hotline where current and past employees, contractors, suppliers and other parties may voice concerns without fear of intimidation, disadvantage or detriment. Allegations of human rights violations are taken very seriously and overseen by our Ethics Advisory Committee. The Committee undertake a full and confidential investigation and if allegations are substantiated we take immediate remedial action. We also run anonymous employee surveys on an annual basis whereby employees can raise issues and concerns.

The MSWG meets monthly to discuss progress and maintains a due diligence system for supplier management. This system tracks our actions by supplier and risk category, and maintains electronic records of all correspondence, questionnaire responses and other information we request or is provided by suppliers. Any remedial action pertaining to suppliers is also held confidentially by the MSWG.

Governance Structure



5.0 Consultation with wholly-owned entities

The NRMA Group including senior leaders from our controlled entities are members of our MSWG. The MSWG work collaboratively and contribute equally to the NRMA Group's Modern Slavery Statement. The team meet fortnightly to exchange information, review actions, develop strategies and monitor progress. Modern slavery, finance, legal, risk management, procurement, human resources, training and other specialised and relevant functions are centralised across the NRMA Group. This ensures consistent policies and practices. Representatives from all our businesses and controlled entities review and approve the Statement prior to submission to the ARMC and NRMA Board. The MSWG also provide regular progress updates to the ARMC and NRMA Board, responding to questions and providing any requested information.

