



2021 Modern Slavery Statement

This 2021 Modern Slavery Statement (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 minimize the risk of modern slavery in our operations and supply chains for the period 1 July 2020 to 30 June 2021.

Throughout the Statement the use of 'the NRMA' refers to the operational divisions of NRMA Corporate, NRMA Motoring and Membership and the wholly owned controlled entities of NRMA Marine, NRMA Parks and Resorts, NRMA Expeditions and Thrifty.

This is the 2021 Modern Slavery Statement ('Statement') for the NRMA. The Statement has been prepared in accordance with the requirements of the Commonwealth Modern Slavery Act 2018 (the 'Act').

This statement was approved by the Board of Directors of the NRMA at the board meeting held on 3 December 2021.

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



Tim Trumper
NRMA Chair

3 December 2021

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The NRMA's commitment

The NRMA is committed to identifying, addressing and limiting all forms of modern slavery from our operations and supply chains.

As a mutual owned and operated for the benefit of our 2.7 million members across Australia people have, and will always remain a central focus of our organisation. We put people first in every decision we make and action we take. We are deeply committed to living our values which are underpinned by our environment, social and governance (ESG) principles. These including conserving and protecting Australia's unique environment, supporting and sustaining communities and ensuring a robust risk management framework across our business. Our position as one of Australia's most trusted brands is reliant on us acting with integrity in everything we do and we employ and contract with those who share our values and enrich the internal and external relationships with the people and communities we serve.

While the world has continued to feel the ongoing ramifications of the global pandemic that has resulted in millions of lost lives, economic hardship and changes to the way we live, work and interact we are aware of how these conditions have enhanced the risk of modern slavery. While we remain confident that the risk of modern slavery in our own operations is low, we must be even more vigilant in identifying risks across global and complex supply chains. The NRMA is an active supporter of the United Nations Sustainability Development Goals (SDGs), mapping and measuring our performance against them, and are committed to their ethos with respect to the protection of human rights.

Over the last 12 months our Modern Slavery Working Group (MSWG) comprising leaders from our procurement teams, risk, finance, legal, corporate and group businesses have been working to further develop our plans and processes to mitigate modern slavery risks across our supply chains. We are aware that there is much more work to do and look forward to reporting on our progress year-on-year in our Modern Slavery Statements.

Rohan

Rohan Lund
NRMA Group CEO



Structure of the organisation

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

The NRMA includes the operational divisions of NRMA Corporate and NRMA Motoring and Membership, and the wholly, controlled entities of NRMA Marine, NRMA Parks and Resorts, NRMA Expeditions and Thrifty Australia and New Zealand.

The NRMA employs 2,301 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.

It 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 are a shareholder of Coral Expeditions which operates cruises small scale cruise services to remote and unique environments across Australia.

The NRMA Registered Office

Level 13, 151 Clarence Street
Sydney NSW 2000

Our operations

Our business spans the motoring, travel, tourism and leisure sectors.

The services we provide include, roadside assistance services, mobility and commuter services, vehicle rental, advocacy, education, electric vehicle charging infrastructure, tourism and leisure. Our leisure and tourism footprint has continued to grow through the expansion of

NRMA Parks and Resorts and the newly formed NRMA Expeditions. Our operations are generally based within Australia however Thrifty also operates in New Zealand and utilises one offshore contact centre based in the Philippines for its Australian operations.

Operational divisions - NRMA

Operational divisions - NRMA	Function and employees
 <p>NRMA Corporate</p>	<p>NRMA Corporate and NRMA Motoring and Membership provides key functions for the group which include; membership programs, marketing, advocacy, strategy and investments, legal, technology, property services, community programs and involvement with jointly owned motoring organisations including Australian Motoring Services and Club Assets.</p>
<p>NRMA Motoring and Membership</p>	<p>Comprises roadside assistance, driver training, education, batteries and electric vehicle charging infrastructure.</p> <p>NRMA Corporate and NRMA Motoring and Membership combined employ 1095 full, part-time, fixed term and casual employees.</p>

Controlled Entities

Controlled Entities	Function and employees
 <p>Kingmill Pty Ltd and Motoka Rentals Limited as Thrifty Car Rental</p>	<p>Provides vehicle rental services in Australia and New Zealand. Kingmill Pty Ltd has 33 wholly owned locations within Australia and employs 270 full, part-time, fixed term and casual employees. Motoka Rentals Limited has 22 wholly owned locations within New Zealand and employs 73 full, part-time, fixed term and casual employees.</p> <p>The balance of the network is owned and operated by franchisees.</p>
 <p>NRMA Parks and Resorts</p>	<p>NRMA owns and/or manages 48 parks across Australia and employs 395 full, part-time, fixed term and casual employees.</p>
  <p>NRMA Marine</p>	<p>My Fast Ferry provides commuter services in Sydney and employs 85 full, part-time, fixed term and casual employees.</p> <p>Fantasea Cruising provides tourism and leisure services in NSW and employs 58 full, part-time, fixed term and casual employees.</p>
    <p>NRMA Expeditions</p>	<p>NRMA Expeditions provides tourism and accommodation services in Tasmania and employs 228 full, part-time, fixed term and contract staff.</p>

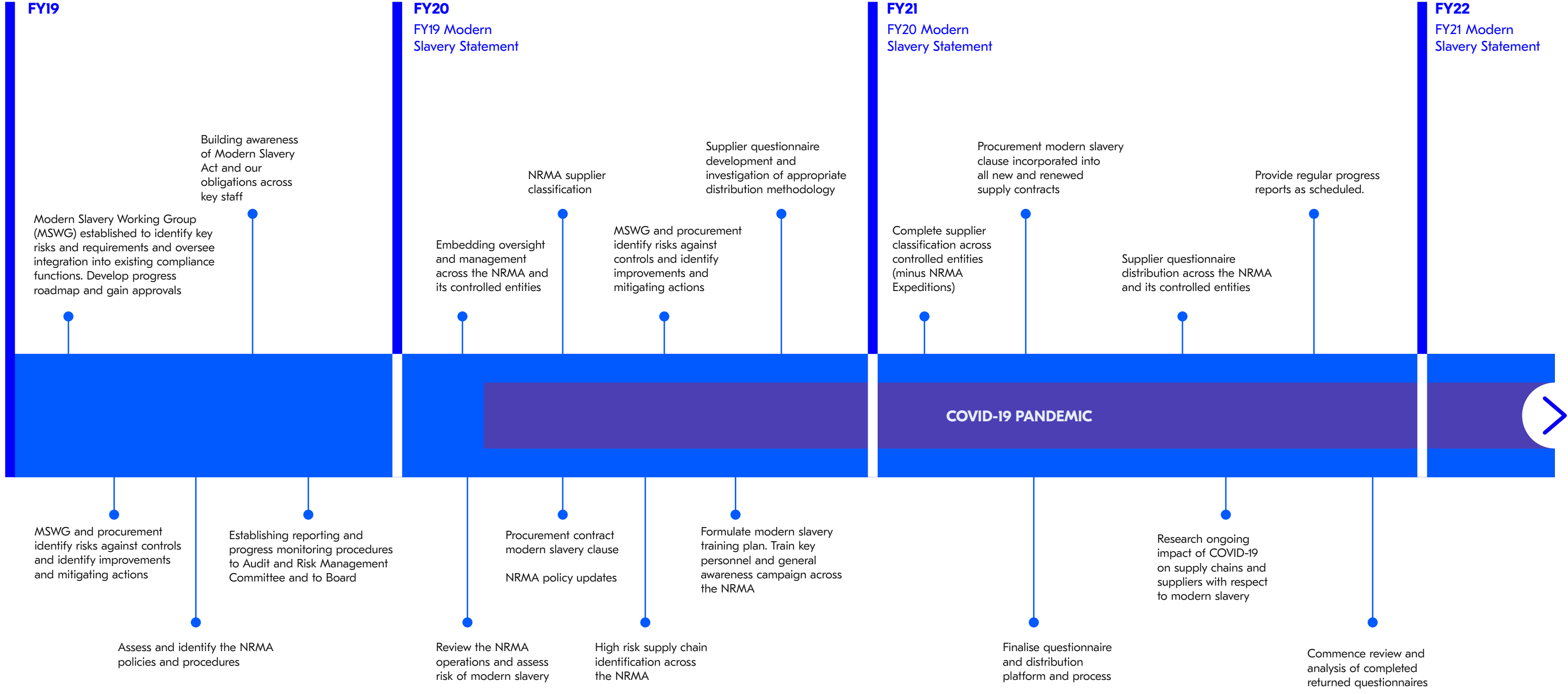
How our obligations under the Modern Slavery Act 2018 (Cth) are managed

Modern slavery is classified as a material risk to our organisation due to its impact on human rights and forms part of our risk management framework. Our Modern Slavery Working Group (MSWG) is charged with responsibility for developing, implementing and overseeing the processes we have in place

to mitigate the risk of modern slavery in our operations and supply chains. The MSWG reports directly to the Audit and Risk Management Committee who report to the NRMA Group Board. The following diagram outlines roles and responsibilities.



Our progress to date



Assessing the risk of modern slavery in our operations and supply chains

The NRMA understands that modern slavery is a complex issue impacting millions of lives. Bringing these practices to an end requires a commitment not only from governments and people generally but from businesses with the power to both demand and effect real change. It is only through acknowledging its existence and ensuring monetary decisions are considered in parallel with fundamental human rights that we can bring about real change. It is easy in a country like our own to ignore the exploitation of people across the globe who are instrumental in providing many of the goods and services we take for granted. The Modern Slavery Act 2018 (Cth) has been the impetus for us to look beyond ourselves, to really understand where and how our necessary goods and services are made, and to understand that even in a country such as our own, modern slavery exists.

Research undertaken in the compilation of this statement highlights the additional risks posed by the COVID-19 global pandemic. As stated by Antonio Guterres, Secretary-General of the United Nations:

‘The COVID-19 pandemic is a public health emergency – but it is far more. It is an economic crisis. A social crisis. And a human crisis that is fast becoming a human rights crisis.’¹

The pandemic has led to millions of the world’s most vulnerable workers being further open to exploitation and we will continue to review available data to ensure we are able to identify existing and emerging risks.



Our operations and the impact of COVID-19

The NRMA is confident that the risk of modern day slavery across our businesses and controlled entities is very low. As a Group, compliance with employee legislation forms part of our Risk Appetite Statement and we have no tolerance for non compliance. We rigorously oversee and monitor employment conditions across the NRMA and undertake periodic payroll audits to verify compliance. We have in place a Speak Up Hotline, Code of Conduct and a suite of People and Culture policies that support compliance more broadly. Details of our policies can be found on page 20.

The COVID-19 pandemic has continued to impact many of our businesses over the last 12 months. International borders have remained closed and there has been the re-introduction of interstate border closures and lockdowns as a result of the Victorian outbreak. The recent emergence of the Delta variant in NSW has led to temporary business shutdowns and a re-emphasis on implementing work-from-home practices where feasible. The NRMA combines office based and frontline workers and some of our businesses have been classified as 'essential services' during the pandemic. As a result, COVID safe work practices have been embedded across all our businesses to ensure the safety and security of our employees and customers. The following provides an overview of our operations and context as to how each of our businesses have been impacted by the pandemic.

NRMA Corporate

NRMA Corporate remains in control of core functions that are jointly shared across our businesses. These include technology and data, finance, safety, risk, compliance, legal services, property services, strategy, and investments. The key impact of COVID-19 was the reorganization of work and technology to enable our people to quickly adapt to changing conditions and work from home. Since the advent of the pandemic office based work has been in accordance with NSW health orders.

NRMA Motoring and Membership

NRMA Motoring and Membership provides roadside assistance and battery replacement, member services, and driver training and education programs to members, customers, and school age children. We also operate our electric vehicle fast charging network throughout regional NSW. Our roadside patrols are classified as essential and have continued to operate subject to rigorous COVID-safe work practices. Services pertaining to driver training were ceased for periods in line with government directions, impacting frontline staff who were redirected to other activities. Face-to-face delivery of our driving and school road safety and education programs was subject to variances however the development of online programs in FY20 enabled us to continue to deliver many of these services using digital media.

Investments

The NRMA has a diversified investment portfolio. Income return over FY21 has been impacted by the challenging environment for company earnings due to COVID-19. Pleasingly this has not necessitated making significant changes to our investment portfolio which has maintained a high level of liquidity and continues to generate strong cash flow. We have however paid even closer attention to the risk profile of our holdings and the businesses we invest in – mindful of the heightened risks of modern slavery at this time. Investments are subject to rigorous due diligence processes.

Our controlled entities

NRMA Marine

NRMA Marine encompasses tourism, leisure and commuter services within Sydney under the My Fast Ferry and Fantasea Cruises' brands.

My Fast Ferry operates commuter services across the Sydney basin. Commuter services were classified as essential services and have continued to run throughout the pandemic to meet the needs of essential workers.

Fantasea Cruises operates our tourism and leisure services within the Sydney Harbour basin. These services include whale watching and harbour cruises. Demand has been significantly impacted by international and state border closures.

Vehicle Rental

Thrifty Australia is 100% owned and operated by the NRMA. Operating through a combination of franchise and company owned locations spanning metro, regional and remote areas of Australia. Rental vehicle supply was classified as an essential service, providing a safe means of transport for people and supporting commercial services during the pandemic. The business has been subject to a significant downturn in rental numbers due to the ongoing interruptions to travel plans.

NRMA Parks and Resorts

Located across Australia our Parks and Resorts business owns and/or manages 48 parks and resorts including the iconic Wilpena Pound in South Australia. While demand for domestic tourism has risen during the pandemic unpredictable border closures affected bookings impacting on business performance.

NRMA Expeditions

Late 2021 the NRMA purchased the Royal Automobile Club of Tasmania's suite of unique tourism assets which include Cradle Mountain Hotel, Freycinet Lodge, Strahan Village, and Gordon River Cruises. While Tasmania has been relatively unscathed by the pandemic the border closures have impacted these businesses through reduced visitation.

Non-controlled entities

Participation in Motoring Organisations

The NRMA exercises a significant influence in the following non-controlled entities both of 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 provides motoring assistance services including the supply of batteries.

Other non-controlled entities

Coral Expeditions

The NRMA purchased a 46% stake in Coral Expeditions in FY21 and exercises significant influence through two allocated Board seats. Coral Expeditions operates small scale cruise services to remote and unique environments across Australia.

Our supply chains

The vast majority of our procurement activity involves the purchase of goods and services direct from Australian providers and suppliers. We are however, aware that the importation of materials and products by Australian businesses is likely to carry modern slavery risks due to the ubiquitous nature of global supply chains. While these global supply chains have brought economic benefits they have also created complex supply networks that make it more difficult to assess modern slavery risks.² Due to their complexity, tracking indirect less visible supply chain participants is difficult.³ The NRMA has thousands of suppliers

providing goods and services across our businesses. Approximately 7.5% of these are top tier suppliers who we spend \$100K or more on a contracted annual and regular basis. The remaining 92.5% are classified as either tier 2 or tier 3 suppliers (based on spend) and include, semi-regular supply contracts and one off or ad hoc supply of goods and services ranging in value.

The following information maps our businesses to their supply chains and identifies those that based on research are classified as high, medium or low risk.

NRMA Corporate

Main operations (corporate controlled functions)

- Environment and compliance
- Finance, property and procurement
- Technology and data
- Investments
- Joint ventures and associates
- Community
- People, culture and safety

NRMA Motoring and Membership

Main operations

- Roadside assistance
- Driver training and education
- Member services
- Batteries
- EV charging infrastructure
- Marketing services
- Call centres in Australia
- Open Road Publishing

Thrifty

Main operations

- Car and truck rental services in Australia
- Car rental services in New Zealand
- Ancillary item rentals: baby seats, booster seats and GPS

NRMA Parks and Resorts

Main operations

- Accommodation and associated services at 48 parks across Australia
- Parks management services

NRMA Marine

Main operations

- Tourism and leisure services Sydney Harbour basin
- Commuter services Sydney

NRMA Expeditions

Main operations

- Accommodations and associated services at 4 locations within Tasmania

	Corporate	Motoring and Membership	Thrifty	Parks and Resorts	Marine	Expeditions
PPE and COVID related safety equipment	High	High	High	High	High	High
Office consumables and promotional merchandise	High	High	High	High	High	High
Uniforms and work attire	High	High	High	High	High	High
Batteries	High	High	High	High	High	High
Cleaning services	High	High	High	High	High	High
Technology, hardware, software, cloud services	Medium	Medium	Medium	Medium	Medium	Medium
Printing, publishing and paper supply	Medium	Medium	Medium	Medium	Medium	Medium
Wholesalers/ancillary items	Medium	Medium	Medium	Medium	Medium	Medium
Food, beverages, wholesalers, catering	Medium	Medium	Medium	Medium	Medium	Medium
Accommodation cabins and amenity buildings	Medium	Medium	Medium	Medium	Medium	Medium
Call centre in Phillipines	Medium	Medium	Medium	Medium	Medium	Medium
Security services	Low	Low	Low	Low	Low	Low
Power - EV charging network	Low	Low	Low	Low	Low	Low
Vehicles and vessels	Low	Low	Low	Low	Low	Low
Catering services	Low	Low	Low	Low	Low	Low
Contractors and subcontractors	Low	Low	Low	Low	Low	Low
Food and beverage wholesalers	Low	Low	Low	Low	Low	Low
Community partners	Low	Low	Low	Low	Low	Low
Managed investments, joint ventures and associates	Low	Low	Low	Low	Low	Low
Fuel, maintenance/spare parts	Low	Low	Low	Low	Low	Low
Utilities	Low	Low	Low	Low	Low	Low
Landscaping services	Low	Low	Low	Low	Low	Low
Furniture and fittings	Low	Low	Low	Low	Low	Low
Professional services	Low	Low	Low	Low	Low	Low

Key:

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 Meehan J & Pinnington B, Modern slavery in supply chains: insights through ambiguity International Journal of Operations Vol 41, No 2, 2021 pp 77-101

³ Nolan J & Bott (2018) Global supply chains and human rights: spotlight on forced labour and modern slavery practices Australian Journal of Human Rights, 24:1 pp 44-69

Meehan J & Pinnington B, Modern slavery in supply chains: insights through ambiguity International Journal of Operations Vol 41, No 2, 2021 pp 77-101

Assessing the risks in our supply chains and operations

As previously outlined we consider modern slavery risks within our own operations to be low and have focused our activity on setting in place processes that will enable us to better understand our supply chains.

The NRMA's procurement guidelines balance price against our ESG principles which consider social responsibility, human rights, caring for our environment, and governance. These principles underpin our risk management framework and guide our corporate behavior.

Modern slavery is considered a material risk to our business and mitigating this risk is paramount. Prior to contracting we require supplier's (excluding ad hoc small supply agreements) to agree to our procurement guidelines which include our expectations and requirements with regard to modern slavery. Though the vast majority of our suppliers are based in Australia we acknowledge that we may be directly linked to the practice through extended and complex global supply chains.

Actions taken in FY21 to mitigate the risks of modern slavery in our supply chains

During FY21 we undertook the following key activities:

Modern Slavery group management and reporting

The MSWG met monthly to oversee progress and address issues across group businesses as they arose. The Audit and Risk Management Committee was provided with updates on the progress of mitigating the risk of modern slavery and in turn provided an update to the Board. The MSWG and procurement leads from each group business worked closely with senior business personnel across the NRMA to consult and advise on our requirements under the Act and to ensure each business was acted in accordance with NRMA policies and procedures.

Training

Key MSWG members attended legal and information seminars to further update their understanding and awareness of modern slavery and key employees were informed about the overarching requirements of the Act. Due to the ongoing demands of the pandemic and restrictions on face-to-face training we have had to rely on digital systems to deliver awareness training in FY21. The lessening of restrictions will enable us to extend our training objectives to frontline and remote employees.

Finalisation and distribution of our Modern Slavery Supplier Questionnaire

In FY21 we finalized our supplier modern slavery questionnaire and spent considerable time considering the best manner to distribute and track responses. Due to the vast number of suppliers across the NRMA we elected to utilize an online platform whereby all suppliers were sent a link to an online portal and asked to complete the questionnaire online. The use of this portal will enable suppliers to update their details as necessary and provide us with accurate record-keeping and up to date data that can be sorted by tier, industry sector and product type. It will also enable us to track mitigation activity undertaken by our procurement teams with specific suppliers.

Links to the online portal were sent to our suppliers in NRMA Corporate, NRMA Motoring and Membership, NRMA Parks and Resorts, Thrifty and Marine. With the recent acquisition of our Tasmanian assets under the banner of NRMA Expeditions we are working on a process to embed ESG, our risk management framework and our procurement processes across the new business. This work will be a focus in FY22.

Contractual Clauses

All new procurement contracts contain the clause with respect to compliance with our obligations under modern slavery legislation. We will update existing long term contracts as they come for renewal.

Identified high risk supply chains

Assessment of these risks by our MSWG were undertaken through a review of available literature on high risk geographic locations, industry sectors and raw material supply. Based on this we have assessed our high risk supply chains against the criteria set out below:



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 and services risks risk

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

Risk to NRMA



Supply chain



Operational

1. PPE & COVID related safety equipment



Risk profile:

The NRMA purchases PPE & COVID related safety equipment direct from Australian suppliers however we are aware that there may be industry sector and geographic risks associated with the manufacture of these items. Many of these items are sourced from countries which have been identified as carrying higher risks of modern slavery. PPE supply chains are complex and often not transparent which can pave the way for ethical misconduct and modern slavery. These risks were highlighted in the University of Melbourne's paper 'More transparency needed in PPE Supply-chains'.⁴

Risk mitigation:

All our major suppliers (generally our stationery suppliers) who supply us with PPE equipment have been forwarded our modern slavery questionnaire. Once all responses are received the MSWG led by our procurement teams will work with suppliers to better understand their supply chains and identify specific risks.

2. Batteries



Risk profile:

NRMA Motoring and Membership purchase batteries for vehicles. Batteries have been identified as high risk due to the raw materials used in production. The country responsible for over 50% of the world's cobalt (essential raw material) has been reported as having widespread human rights abuses and being of extreme risk for child labour, trafficking, modern slavery and health and safety.⁵

Risk mitigation:

All our batteries are purchased from AMS a non-controlled entity over which we exercise significant influence. AMS supply batteries to a range of auto clubs around Australia and are mandatory reporters under the Modern Slavery Act 2018 (Cth). AMS have undertaken site audits on their priority suppliers located in South Korea and implemented mitigation processes where appropriate. We will continue our dialogue with AMS to further investigate raw material supply.

⁴ pursuit.unimelb.edu.au/articles/more-transparency-needed-in-ppe-supply-chains

⁵ greentechmedia.com/articles/read/green-battery-revolution-powering-social-and-environmental-risks

3. Office supplies and promotional merchandise



Risk profile:

The NRMA purchases office stationery products and promotional merchandise directly from Australian suppliers. This category has been classified as high risk due to geographic and industry sector risks and the use of low skilled workers in production.

Risk mitigation:

The NRMA has contracted relationships with our major suppliers in this sector. All have been forwarded links to our modern slavery questionnaire. In recognition of the risks posed in this category we will seek to work with these suppliers to better understand where goods and services procured by us are sourced from and take remedial action where required.

4. Uniform and work attire



Risk profile:

The NRMA sources and purchases uniforms for frontline workers on a regular basis from Australian suppliers and has identified these purchases as carrying high risks of modern slavery due to manufacturing locations and the industry sector. The clothing sector has received significant publicity with respect to poor labour conditions and modern slavery practices. Indeed a significant clothing shipment of Japanese fashion retailer Uniqlo was recently seized by US Customs on suspicion that the garments were made using forced labour.⁶ Hasan R. in his paper *Modern Slavery in Global Apparel Supply Chain: An Important Research Agenda* notes how '...fluidly the products made by slaves are merging into the legitimate commercial channels.'⁷ Countries that produce these garments are generally identified as having vulnerable populations who can be readily exploited.

Risk mitigation:

Our primary supplier has provided a detailed response to our questionnaire and have in place a Modern Slavery Policy pertaining to procurement and an Ethical Supply Chain Policy. We will continue to work with them to monitor risks and take actions as required. Secondary suppliers in this category have been forwarded links to our modern slavery questionnaire and we will work closely with these suppliers once we have assessed their responses.

5. Cleaning services



Risk profile:

Cleaning services have been identified by the Department of Home Affairs as a key risk area for modern slavery in Australia. This is because the industry tends to employ unskilled and often vulnerable workers such as migrants who may not be aware of their rights under Australian law. Work often occurs outside regular business hours making it more difficult for companies like ourselves to monitor. Operating across industry sectors and locations spanning the breadth of Australia the NRMA procures these services from multiple providers from sole traders to companies.

Risk mitigation:

All providers supplying cleaning services across the NRMA (except NRMA Expeditions) have now been forwarded links to our modern slavery questionnaire. We have one primary supplier who looks after our Sydney premises (across multiple sites) who have provided us with a copy of their Modern Slavery policy, Modern Slavery Statement and Supplier Code of Conduct. Other contracted suppliers in this category are small or sole providers who are not required to submit a statement and many are unaware of the Modern Slavery Act 2018 (Cth). We have received multiple inquiries as to our requirements and are creating an information pack and guidelines to both inform them of our obligations under the Act and to assist them in completing the questionnaire. We project working through this process in consultation with our providers in FY22.

Ongoing assessment and monitoring

The MSWG will continue to monitor research and data available to identify modern slavery risks. Over time our supply chains will change and adapt to differing business conditions and mapping new supply chains will be critical to keep abreast of new and emerging risks.

Remediation processes

Our work in FY21 has focused on the set-up and distribution of our modern slavery questionnaire across our supplier network. Knowledge and understanding of obligations under the Act is, as expected strong amongst mandatory reporters and large businesses however we have found there is very limited knowledge and understanding across non-mandatory reporters who account for 92.5% of our supply chain network. Many of these suppliers have contacted us seeking to gain a better understanding of our obligations under the Act and clarify our expectations with respect to questionnaire completion. As a result we realise that a significant proportion of our focus in FY22 and FY23 will involve working with these smaller suppliers to inform and educate them on modern slavery including:

- why it is important for the NRMA to mitigate modern slavery risks
- our obligations as a mandatory reporter,
- our expectations with respect to our suppliers' questionnaire completion, activities and supply chains
- how we can assist and collaborate with them to mitigate any perceived risks

At this stage we are focusing on our identified high risk supply chains. Continued assessment will be undertaken and we will work with suppliers to ensure compliance with our supplier engagement principles and collaboratively work with them on identified areas of non-compliance.

We are also working on the development of a Responsible Investment policy which is expected to commence in FY22. The purpose of the NRMA Responsible Investment Policy is to provide an outline of the principles and commitments and the approach towards responsible investment.

The MSWG are responsible for undertaking research and data on modern slavery and the risks within our operations and supply chains and assessing supplier responses to questionnaires. They are also working with our learning and development team to facilitate modern slavery training more broadly across the organisation and working with our procurement teams to ensure new suppliers are adequately screened for modern slavery risks.

Measuring the effectiveness of our actions

The MSWG measure the effectiveness of our actions and reports through to the ARMC. At this point we are still assessing responses to our supplier questionnaires. Due to the vast number of suppliers across the NRMA this will take some time and is why, at this stage, we have elected to commence a detailed assessment against our Tier 1 high risk suppliers.

We will continue to review and strengthen our risk management framework and corporate governance, and will undertake regular training with external third parties to incorporate best practice into our modern slavery processes and procedures. In FY22 we will seek to commence annual risk audits with our tier 1 high risk suppliers ensuring that remedial actions are implemented where necessary. The effectiveness of our actions will be measured against our risk management framework.

⁶ business-humanrights.org/en/latest-news/japans-uniqlo-shirts-was-seized-by-us-customs-after-officials-suspected-they-were-produced-using-forced-labor-in-xinjiang/
⁷ Hasan R. Modern Slavery in Global Apparel Supply Chain: In Important Research Agenda. Journal of Textile Science & Fashion Technology July 2019

NRMA policy updates

The internal policies that govern our people and suppliers and impact our actions under the Act are listed below. These policies are reviewed and updated regularly to ensure we are meeting our obligations under the Modern Slavery Act 2018 (Cth).

Policies	Purpose: Procurement	Status	Scope
Procurement Tendering & Contract Management Policy	Outlines our expectations with regard to transparency and minimisation of opportunities for fraud, corruption, collusion and conflicts of interest. It requires compliance with our NRMA Supplier Engagement Principles	Completed	Suppliers
NRMA Supplier Engagement Principles	Sets forth our commitment to the Act and the Fair Work Act 2009 and sets out our expectations of suppliers and insists on their compliance with the principles contained within and requirements pertaining to monitoring risks and record keeping.	Completed	Suppliers

Policies	Purpose: Operations and Execution of Corporate Strategy (includes investments and acquisition)	Status	Scope
Community & Sustainability Policy	Outlines our commitment to the United Nations Sustainable Development Goals and how these are considered in our strategy and operations.	Completed	All group businesses
Code of Conduct	Our Code of Conduct defines the expectations we have with regard to how our employees behave internally and externally and impels them to take action when behaviours are identified that do not align with these values.	Completed	All group businesses
Speak Up Policy	Provides an externally hosted hotline whereby current, former workers, contractors, suppliers and their employees and associates of NRMA can raise actual or suspected concerns of conduct that is in contravention with our policies without fear of intimidation, disadvantage or detriment. The policy maps out our process of investigation for employee disclosures.	Completed	All group businesses
Risk Management and Organisational Resilience Policy	Embeds and maintains a risk management and organisational resilience approach across all levels of the business to support the delivery of organisational objectives in line with our legislated requirements and pertaining to our organisation's reputation.	Completed	All group businesses