



# Modern Slavery Statement

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**A2B Australia Limited**

ACN 001 958 390

Adopted by the Board on 16 December 2021

# Modern Slavery Statement

## 1. Introduction

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This Modern Slavery Statement is prepared for, and on behalf of, A2B Australia Limited (**A2B**).

It is made in accordance with the *Modern Slavery Act 2018* (Cth) and covers the period 1 July 2020 to 30 June 2021 (**Reporting Period**). It sets out the actions taken by A2B to address modern slavery and human trafficking risks in its business and supply chain during the Reporting Period.

A2B opposes slavery in all its forms. Our efforts to identify, address and minimise the risk of modern slavery in our operations and supply chains are part of a yearly evaluation and improvement cycle and are linked to our governance and operating frameworks.

## 2. About A2B

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A2B is an Australian ASX listed company, headquartered in Sydney. A2B has 21 sites spread across Australia, the United States and the United Kingdom and employs 825 staff globally. More than 98% of A2B's employees are based in Australia and their employment conditions are covered by the National Employment Standards (**NES**) which set out the 10 minimum employment entitlements that have to be provided to all employees.

In addition, over 40% of our employees are covered by modern awards or industrial agreements, which set minimum pay and conditions for specific categories of workers. The remainder of our employees have individual employment contracts, which provide additional conditions for an individual employee, but cannot reduce or remove the minimum entitlements prescribed under the NES.

A2B predominantly provides payment solutions, technologies, products and support services that enable the successful operation of personal transport services and instant deliveries to its customers in Australia, New Zealand, the United States, Canada, the United Kingdom, Finland, Sweden and Denmark. Outside of the personal transport industry, A2B develops software solutions for clients in the banking and retail sectors.

A2B is made up of a number of wholly owned subsidiaries, all of which make up the A2B Group. All companies in the A2B Group are managed by one Executive team, follow policies and processes set by A2B and share centralised procurement, finance, legal, company secretarial functions, distribution, purchasing, marketing and sales activities.

A2B's operations can be grouped into three categories:

- **Mobility:** A2B provides Taxi Network services under brands including 13cabs, Silver Service, Maxi Taxi, Lime Taxis, Apple Taxis, Champ and TaxiTech to Taxi Operators

and Drivers across Australia. A2B also operates the Mantax Black Cab network in the UK city of Manchester. A2B's services include facilitation of booking dispatch through mobile apps, web and call centre operations, instant delivery services, full Taxi fit outs, repairs to assist Operators in managing their fleets, vehicle finance, insurance to assist Operators, and the provision of Driver education, training and uniforms.

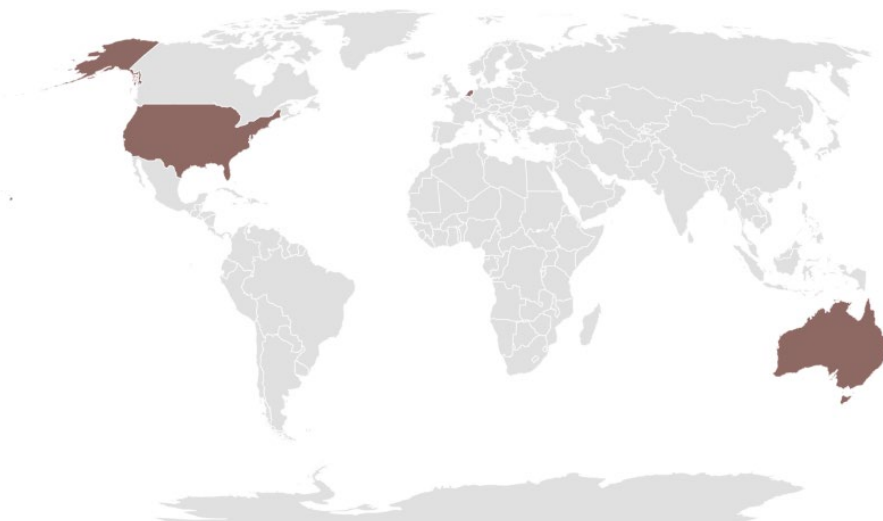
As a response to COVID-19, A2B continues to operate vehicle sanitisation services available to all of its Operators and Drivers.

- **Mobility Platform:** Through Mobile Technologies International, A2B provides innovative dispatch and booking technology to customers in Australia, New Zealand, the United States, Canada, the United Kingdom, Finland, Sweden and Denmark.
- **Payments:** Through the provision of in-vehicles and handheld payment terminals and payment processing for Taxi networks, Drivers and hire cars, along with the provision of payment terminals for retailers, A2B provides payment services under the Cabcharge, Spotto and Giraffe brands to participants in the personal transport industry and FlamingoPay in the retail sector. A2B also provides Passengers with a range of payment solutions to meet their personal transport needs. For Corporate Clients A2B offers innovative products to charge Taxi expenditure on account and delivers real time trip information that facilitates efficient management of travel expenditure under the brand Cabcharge. Outside of personal transport, A2B, through its EFT Solutions arm, provides consulting and payment services and bespoke product innovation for payment terminal providers and banks and other major retailers in Australia.

### 3. Supply Chain

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To facilitate A2B's operations, A2B's centralised procurement team sources its goods and services from a variety of small, medium and larger suppliers in accordance with its Procurement Policy. A2B's direct suppliers are predominantly located in Australia, with some smaller suppliers in the United States and the Netherlands. Approximately 60% of A2B's suppliers by spend are located below.



The following are the key goods and services sourced by the A2B Group during the Reporting Period:

- Payment Terminals and Printers & Dispatch Hardware
- Software & Hardware
- Vehicles & Associated Equipment
- Customer Products
- Uniforms
- Insurance products
- Professional services (e.g. Accountants, Lawyers, Advertising Agencies)

During the Reporting Period, the COVID-19 pandemic resulted in some impacts to A2B's usual supply practices. Due to supply shortages with respect to personal protective equipment, A2B identified and on-boarded new suppliers that were based in Australia to manage stock and to protect staff and visitors on-site.

#### 4. Risks of modern slavery practices

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A2B has considered the extent to which the A2B Group may contribute to, cause or be linked to modern slavery risks in its operations and supply chains.

The risks associated in the countries in which the A2B Group operates is considered low. The A2B Group operates predominantly in Australia with very minor operations in both the United States, Canada, United Kingdom and Finland. These countries have established laws and regulations governing employee and workers' rights affording them protection against unfair conditions resulting in A2B's operations having a relatively low modern slavery risk rating in those countries.

Further, A2B analysed the Group's top 40 suppliers by spend, where it can be seen that approximately 92% of A2B's direct suppliers are located in Australia, 6% in the United States and 2% in the Netherlands. These countries are considered relatively low risk in terms of modern slavery.

#### 5. Actions taken to assess and address risks

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During the Reporting Period, A2B undertook a program of work to review and improve the A2B Group's systems and practices for assessing and addressing potential modern slavery risks in our operations and supply chain. The key systems and processes for identifying, preventing, and mitigating potential modern slavery risks in our operations and supply chains are set out below.

##### **Due diligence**

A2B has three working groups to assist the business in assessing and addressing modern slavery risks.

A **Modern Slavery Committee**, responsible for reviewing, assessing and addressing risks of modern slavery practices across our operations and supply chain, is a cross-

functional working group of employees with responsibility for the oversight of procurement, legal and risk processes across the business.

During the Reporting Period, the Modern Slavery Committee:

- completed a review of A2B's most significant suppliers by spend across the A2B Group (comprising approximately 70% of all A2B procurement) to determine the extent to which modern slavery risks exist within its supply chain;
- distributed supplier questionnaires to key A2B suppliers;
- reviewed responses received from relevant suppliers to gauge their level of understanding of modern slavery and other human rights issues; and
- included, where possible, clauses relating to modern slavery in new supplier contracts, which require compliance with modern slavery laws and provide us with certain assurance, audit and termination rights.

A **Procurement Working Group** which is responsible for undertaking reviews of existing suppliers and conducting supplier assessments before onboarding any new key suppliers.

During the Reporting Period, the Procurement Working Group conducted a review of, and updated, A2B's Procurement Policy to ensure it is in line with best practice and modern slavery mitigation and controls. The Working Group also introduced a set of guidelines to assist commercial managers in preparing new procurement and supply contracts.

A **Risk Working Group** responsible for identifying new risks to the business, reviewing the risk register and progress against control enhancements. The composition of the Risk Working Group is re-assessed annually to ensure key operational areas provide input in the risk management process.

The Risk Working Group is informed of modern slavery risks by the Modern Slavery Committee and during the Reporting Period, the Risk Working Group did not determine modern slavery to be a high risk to the business.

### **Training**

During the latter half of FY21, A2B's Executives completed modern slavery risk training which identified the many types of modern slavery and raised awareness of how a lack of due diligence can allow modern slavery to make its way into any organisation's supply chain. The course also provided training on how to recognise the red flags of human trafficking, forced and compulsory labour, bonded labour, and sexual or criminal exploitation.

## **Remediation**

A2B's modern slavery program is complemented by governance and operational policies applying to the A2B Group, its employees and its contractors. Those policies provide mechanisms for our people to report concerns about suspected or actual improper conduct, including in relation to modern slavery, and for us to remediate any impact of modern slavery in our operations and supply chains. An overview of A2B's governance practices is set out in our Corporate Governance Statement, contained in our Annual Report and available here: <https://www.a2baustralia.com/investor-center/reports/>.

Key policies which are directly relevant to our modern slavery program include:

- Our **Code of Conduct**, adopted in 2018, which enforces our expectation for our people to behave and conduct business in a manner consistent with our values. This includes compliance with any applicable policies, procedures, laws and regulations, which include those that deal with modern slavery. Breaching the Code of Conduct may result in disciplinary actions including and up to termination.
- Our **Supplier Code of Conduct**, adopted in 2019, which sets out our minimum standards in relation to matters including compliance with laws, human rights and humane treatment of workers, wages, benefits and working hours, and ethical business practices. We expect our suppliers, whether directly or through their supply chain, to conduct themselves in accordance with that Code and implement suitable management systems and processes.
- Our **Speak Up Policy**, adopted in December 2020, which encourages people (including our employees and suppliers) to speak up if they become aware of potential misconduct, and to promote a workplace environment in which everyone feels safe, supported and encouraged to do so. Reports may be made anonymously.
- Our **Anti-Bribery and Corruption Policy**, adopted in December 2020, which sets out the A2B Group's commitment to countering bribery and corruption, what constitutes bribery and corruption, the types of conduct that are prohibited, employees and business partners' obligations, and how to report breaches or suspected breaches.

A2B's core governance policies are made available on our website and can be accessed here: <https://www.a2baustralia.com/investor-center/corporate-governance/>.

## **6. Assessing the effectiveness of our actions**

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Building on A2B's first modern slavery statement for FY20, during the Reporting Period we assessed the effectiveness of our actions in addressing the risk of modern slavery by:

- reviewing the actions taken by A2B on modern slavery, and recommending process improvements to management, including adopting a Speak Up Policy and Anti-Bribery and Corruption Policy;
- regularly updating the A2B Group's risk assessment to capture changes to its modern slavery risk profile; and
- establishing objectives for the business relating to modern slavery (e.g. roll-out of the supplier questionnaire and model clauses etc.) and receiving regular updates from management on progress against those indicators.

In addition, the ability for our employees and suppliers to report any issues to us is an effective tool in uncovering any gaps in our processes with any issues being quickly assessed and resolved. We will continue to monitor and improve upon our practices to mitigate the risks of modern slavery to our business, which includes reviewing and assessing the effectiveness of our policies, codes, standards and procedures. We will continue to educate our employees on what modern slavery is and how to recognise it in the industries in which we engage so we can better mitigate the risk of it occurring.

## 7. Consultation and approval

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In preparing this modern slavery statement and confirming its contents, the Modern Slavery Committee met regularly. Members of the management team with specific operational responsibility for A2B and the entities owned and controlled by it were also asked to provide feedback on the statement prior to it being presented to the Board of A2B for final review and approval.

Approved by the Board of A2B on 16 December 2021 in accordance with a resolution of the Board.



Andrew Skelton  
Managing Director and Chief Executive Officer of A2B