



SG Fleet Group
Integrated Mobility

ESG Statement 2024



2024 ESG Statement

SG Fleet’s approach to long-term value creation for all of its stakeholders is driven by the principle that industry-leading environmental, social, and governance (‘ESG’) behaviours should be integrated into daily business practices.

The 2024 ESG Statement (previously referred to as the Sustainability Statement) outlines the relevant actions taken by the company during the 2024 financial year with respect to the risks identified as ‘material’ in the Group’s ESG Strategy.



Our ESG Path

The company established a Sustainability Committee, governed by a Charter, in 2019. In 2021, SG Fleet issued its first Sustainability Statement. In August 2022, the Group’s ESG Strategy was launched.

The ESG Strategy, which is reviewed on a three-yearly basis, optimises how we determine and manage our key ESG risks, outlining both current practices and future focus areas. The determination process considers the nature of our business operations, which are predominantly the provision of services in an office-based environment. The ESG Strategy can be found at the Investor Centre section of the www.sgfleet.com website.

The company’s first ESG Action Plan, which spanned the second half of the 2023 financial year, was developed in late 2022. The Action Plan consists of a list of initiatives grouped under the Environment, Social, and Governance headings earmarked for execution during the period.

New Action Plans are developed in June of every calendar year and apply to the subsequent financial year period. A detailed account of the 2024 ESG Action Plan outcomes is provided in this Statement.

In December 2022, a new governance structure was introduced, reflecting the broader scope of our approach under the new ESG Strategy. The Sustainability Committee was replaced by the ESG Committee, in respect of which a Charter was established in January 2023. The Committee’s first meeting took place in March 2023.

In April 2023, the company introduced a revised Environmental Policy. More about this Policy can be found in the Environmental section of this Statement.

Financial Year 2024

During the 2024 financial year, the company executed its first full year ESG Action Plan, with a particular focus on aligning our ESG values across the organisation to take full advantage of the strong commitment of our people to sound ethical behaviours. To ensure a dedicated focus on the management of environmental impacts, an Emission Reduction Action Plan was created within the overall Plan. In the reported period, approximately 70 ESG Action Plan initiatives were completed across various environmental, social, and governance categories.

To support these efforts, the company launched eSGclub, a dedicated staff ESG hub through which we provide information on various topics, collect feedback and suggestions, and organise a range of educational events. We also established a dedicated ESG virtual library on the company’s intranet, providing our people with news and information about the latest developments in sustainability.

Future Focus

In the 2025 financial year, we will aim to further raise staff awareness of environmental, social, and governance issues relevant to the company and its stakeholders and drive engagement at all levels in support of our ESG Strategy objectives.



Key Highlights

✔ **Group-wide carbon neutrality achieved**

✔ **Group ISO 14001 Environmental Management System accreditation**

✔ **Execution of the company's first full year ESG and Emission Reduction Action Plans**

✔ **First staff ESG events**

✔ **Launch eSGclub staff hub and library**

✔ **Introduction of comprehensive supplier ESG survey**

Environment

SG Fleet ensures its day-to-day operations minimise resource consumption, waste, and emissions. In addition, we work with our customers, business partners, and suppliers to assist them with their environmental impact reduction initiatives.

SG Fleet's ESG Materiality Assessment identified the following environmental risks as material to the company:

- Levels of emission impacting the environment

Risks that are perceived as relevant to the wider community, even if not directly material to SG Fleet due to the nature of its business, are:

- Other environmental risks, such as energy consumption levels and waste

Group Environmental Policy

SG Fleet's Environmental Policy outlines the company's approach to achieve the following objectives: (a) continually improve its overall environmental performance and management, (b) reduce the Scope 1, 2, and 3 emissions that fall within the boundaries of its environmental impact assessment, and (c) fulfill any compliance obligations.

With regard to the emission reduction objective, SG Fleet aims to reduce emission intensity, measured as tCO₂-e per Full-time Equivalent to take into account growth in the business, by 33% by the end of the 2030 financial year, with the 2023 financial period as the base year.

The execution of the Policy is independent of the company's carbon neutrality status in its various geographies and the company will continuously explore options to further cut emissions and progressively reduce its reliance on carbon offsets to achieve carbon neutrality.

To achieve these objectives, SG Fleet operates an environmental management system ('EMS'), which is based on global and local standards, including ISO 14001:2015, and all applicable regulations and laws.



The EMS is comprised of the Environmental Policy, the environmental component of the ESG Action Plan, the ESG Committee governance structure, and all associated monitoring, measurement, management, and reporting activities.

The environmental component of the ESG Action Plan, referred to as the Emissions Reduction Action Plan, or E-RAP, lists environmental initiatives earmarked for execution or assessment during the period. The initiatives are grouped by the relevant risk, the corresponding emissions-producing activity, as well the scope under which these emissions fall. E-RAP focuses in particular on the areas identified as the main contributors to the company's emissions total. As these areas are an integral part of the company's day-to-day operations, the execution of the Environmental Policy and E-RAP, as well as the operation of the EMS, involve the implementation of adjustments to a range of ongoing business practices.

ISO 14001

During the 2024 financial year, SG Fleet achieved group-wide ISO 14001:2015 Environmental Management Systems accreditation, confirming its best-practice approach to managing any potential environmental impacts.



Transition to ESG Statement

In compliance with the Australian Sustainability Reporting Standards (ASRS), a set of guidelines developed by the Australian Accounting Standards Board (AASB) to help companies comply with future mandatory climate reporting requirements, SG Fleet will issue its first Sustainability Report following the 2026 financial year. To clearly delineate this Report from the company's past Sustainability Statements, the present document will be referred to as the ESG Statement from the 2024 financial year report onwards.



Building a culture of sustainability

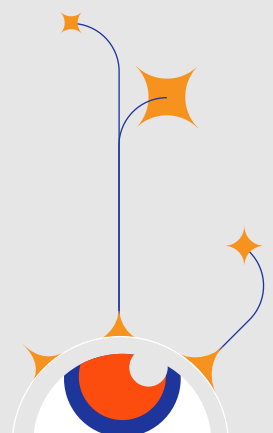
As part of its drive to build sustainability awareness, SG Fleet invited insect protein farmer Circle Harvest for an ESG Staff Lunch & Learn event. Our people had a great opportunity to learn all about the benefits of nutrient-dense superfoods made with edible bugs and how their production has a major positive impact from a sustainability perspective.



CIRCLE HARVEST

Drive

sustainability
awareness



Environment

Leading the way in cooperation with our stakeholders

We believe that we can create a positive environmental impact not only by reducing the company's own footprint, but also by shaping and supporting behaviours with our various stakeholders. In addition to instilling environmentally sound practices in the workplace, we aim to provide our people with information on how to contribute to a more sustainable future in every walk of life. The same objective is also the foundation of the work we do with our customers to support their organisational sustainability objectives.



The 2024 financial year saw a continuation of the shift to sustainable mobility, kickstarted in Australia in the previous period by a series of government incentives. Both hybrid and battery electric vehicles remained in high demand, and SG Fleet was again able to assist customers by utilising its recognised low and zero-emission transport expertise. The company accounted for a significant percentage of private EV registrations in Australia, leading the way in introducing drivers to a new and environmentally sound propulsion technology. SG Fleet continues to work with a range of companies and organisations to prepare for the future introduction of lower emission fleets and contribute to broader national and international decarbonisation efforts. EV Drive Days again were a very successful method of raising awareness and understanding of alternative engine technology during the year.

In the UK, SG Fleet was again recognised for its expertise in the EV field, winning the Business Car 'Best Eco Initiative' award for the second consecutive year for the eStart EV consulting service. In Australia, SG Fleet was a significant contributor to the REVS vehicle-to-grid project, which successfully trialed the transfer of EV battery energy into the electricity grid.

eStart



REVS

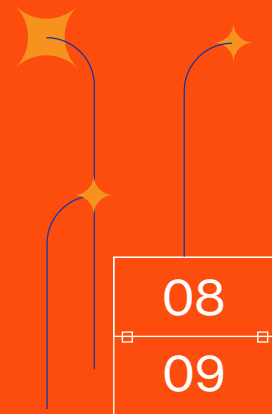
The future is multi-modal, and our solutions are not limited to traditional vehicle types. The functionality of alternative modes of transport is increasingly recognised in the personal and delivery transport space, with consumers and companies exploring micro-mobility as an environmentally friendly, viable alternative. SG Fleet's cooperation with eMobility provider Zoomo offers customers additional options to improve the efficiency of their fleets, both in terms of flexibility and sustainability.



SG Fleet's contribution to a better transport future isn't limited to its day-to-day services. We also actively collaborate with industry bodies and organisations across all of our geographies to inform, foster debate, and break down barriers. In Australia, the company is an active member of the Electric Vehicle Council and the Australian Hydrogen Council. In New Zealand, we are members of Drive Electric NZ and the Sustainable Business Council. In the UK, we work with the British Vehicle Rental and Leasing Association (BVRLA) to assist with the Government's Road to Zero strategy.

objectives

staff events to promote environmental awareness



Future Focus

In future periods, in addition to continuing to make a difference by supporting our stakeholders' environmental objectives, we will continue to widen the scope of our focus. This includes reviewing the environmental performance of our premises with landlords, reciprocal participation in our customers' sustainability efforts, and the organisation of further staff events to promote environmental awareness. The 2025 financial period will also see the introduction of specific environmental training modules for our people.

Environment

Emissions

SG Fleet measures its emissions footprint both as direct CO₂ emissions and as the emissions equivalents associated with a range of business or support activities. As an office-based services company, SG Fleet does not directly produce meaningful levels of CO₂ in its day-to-day business operations. We only operate a small internal fleet of vehicles, and the provision of our services does not generally require significant travel or transport.

The main contributors to our emissions equivalent total are IT equipment and services, electricity consumption (see below), staff commuting, and to a lesser extent, waste (see below), direct emissions from our own fleet, and air travel. We continuously explore options to further cut emissions across Scope 1 and 2 and, where under the company's control, Scope 3, with a particular focus on these main contributors.

Where possible, we move IT-related equipment and services off premises towards more sustainable solutions. This reduces their emissions equivalent impact. We also source equipment that includes offsets as part of the purchasing or leasing contract.

SG Fleet has actively targeted emissions produced by staff commuting and business travel for a number of years, offering arrangements and facilities that will reduce fuel consumption overall. This included carpooling clubs, the availability of eBikes, and the installation of bicycle storage sheds at our offices. In the 2024 financial year, we introduced shuttle buses at the company's head office. The buses ferry staff back and forth between our premises and the nearest train stations, encouraging our people to use public transport rather than commuting individually by car.



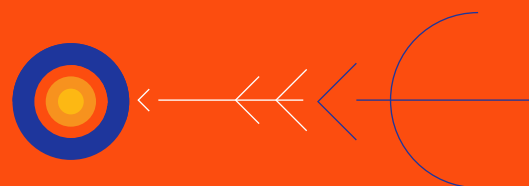
In Australia, the rate of transition of SG Fleet's own fleet to low and zero-emission vehicles accelerated again during the period, increasing from 10% at the end of the 2022 financial year to 61% at the end of the 2024 financial year. Use of our on-premises EV chargers continues to increase, reflecting the growing proportion of EVs in our own fleet and amongst our staff.

The Australian operations of SG Fleet have obtained a yearly ClimateActive certification as a carbon neutral organisation since the 2022 financial year. SG Fleet's UK operations achieved carbon neutrality for the first time early in the 2023 financial year. In the 2024 financial year, our New Zealand operations obtained the same status, making the entire SG Fleet Group carbon neutral.



Future Focus

SG Fleet is currently in the process of developing net zero targets for each of the geographies in which it operates and continues to target a reduction in direct and equivalent emissions by focusing on the major sources within its control. As the company continues to grow, IT services use, energy consumption, the number of staff commuting, and business travel are at risk of increasing as well. We will look to counter a corresponding escalation in emissions via a more efficient use of resources, in the process reducing emission intensity per full-time equivalent employee. The company will also continue to move towards a larger proportion of low or zero-emission vehicles in its own fleet.



Aiming for

**net zero
targets**



Energy Consumption

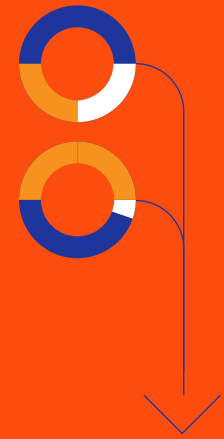
SG Fleet's energy consumption is largely limited to the operation of its office and warehouse locations, including lighting, power sources, and heating. Where corresponding arrangements change or energy-consuming equipment is replaced, the company investigates the feasibility of introducing more energy-efficient alternatives. We also actively encourage our people to be mindful of the energy consumed by office equipment and utilities.

At the end of the period, LED lighting and Green Energy arrangements were in place for all offices where we have direct control over lighting and energy set-ups.



Additional

initiatives to reduce overall energy consumption



Future Focus

SG Fleet aims to lower its energy intensity ratio by putting in place additional initiatives to reduce overall energy consumption, including the adoption of 'smart working' set-ups and sensor/timed lighting and air conditioning systems. The environmental staff e-learning module that will be introduced in the 2025 financial year will include additional tips to minimise energy consumption wherever possible by actively reducing the use of appliances, lighting, and air-conditioning. Where possible, the company continues to explore further opportunities with its landlords to improve the sustainability of its offices.

Environment

Waste

SG Fleet does not produce meaningful quantities of waste for packaging or other purposes, but our aim is to further minimise waste generation in the conduct of our business. Where waste is generated, for example in the operation of offices or disposal of hardware, we explore opportunities to divert waste via the process of recycling triage.

IT assets, including desk and data centre hardware, are recycled wherever possible after extracting optimal, life-time use of the equipment. Company-issued mobile phones are offered for sale to the user, or if unsold, go into our external disposal process, with a third-party provider recycling, refurbishing, re-selling, or securely destroying these and other end-of-life IT assets. In selecting the third-party provider, we assess the company's disposal process and environmental commitments.



While SG Fleet does not dispose of vehicle tyres itself, the company is a member of Tyre Stewardship Australia, whose stated mission is to create productive outcomes for end-of-life tyres and increase the use of locally tyre-derived products. We actively encourage our customers to join this worthwhile scheme.



During the 2024 financial year, SG Fleet targeted the production of waste in the daily operations of its offices, which mainly consists of staff disposing of consumables and small amounts of general waste, such as foodstuffs and food packaging. Following the refurbishment of the company's head office, designated disposal receptacles were installed in other premises. Plastic water bottles continued to be phased out in favour of reusable containers.



At the occasion of the eSGclub launch, all SG Fleet staff were issued with eco-friendly reusable cutlery sets. Use of the sets will reduce the amount of waste in the shape of plastic disposable cutlery and also lessen the need for the use of water and energy-intensive dishwashing appliances.

While SG Fleet does not manufacture vehicle accessories, we are committed to selecting the most environmentally sound products when providing third party products to our customers. In the 2024 financial year, the company started offering RubberTree eco vehicle carpet mats. The mats are made from 97% recycled materials, providing our customers with a locally-manufactured, cost-effective, and sustainable product choice to help them in the pursuit of their own environmental objectives.



Waste disposal

environmental e-learning module



Future Focus

We continue to look at opportunities to further reduce the production of waste and optimise its disposal. Physical collateral will progressively be phased out and replaced by digital alternatives, both for internal and customer purposes. In the 2025 financial year, a comprehensive campaign will be rolled out to ensure office waste disposal by staff is conform across all offices and follows prescribed paths, for example by improved labeling and guidance on which disposal receptables to use. This will be reinforced by the environmental e-learning module to be introduced during the year.

Other Environmental Aspects

While due to the nature of its business, SG Fleet does not utilise a meaningful amount of packaging or other materials such as paper, or consume and discharge significant amounts of water, we do approach the management of any materials and water consumption as an integral part of our overall environmental approach. Accordingly, we continue our efforts to minimise associated impacts.

Since the 2021 financial year, we have continuously reduced paper use across the Group. In the 2024 financial year, a further reduction of 58% on the previous period was achieved. This was helped further by the introduction of a 'paperless & clean desk' policy in our newly refurbished Pymble head office in the 2023 financial year and progressively in other locations in the reported period.

SG Fleet conducts yearly audits on the outsourced wash facilities used for the cleaning of end-of-lease vehicles, monitoring detergent use and water disposal processes. While there have been no reported environmental incidents in the 2024 financial year, we continue to pursue further improvements to these facilities.

As an office-based business located in urban areas, SG Fleet's activities have a negligible direct impact on natural habitats.

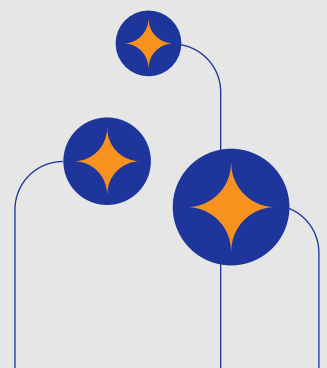
Growing Hope

SG Fleet rolled up its sleeves and helped plant trees with other Greenfleet volunteers at an event sponsored by Sutherland Shire Council in Sydney, Australia. About 1,300 new native trees and shrubs will flourish as a result of our combined efforts, helping to reduce carbon emissions, restore biodiversity, and provide local wildlife a home.



About

1,300
new native
trees and
shrubs will
flourish



Social

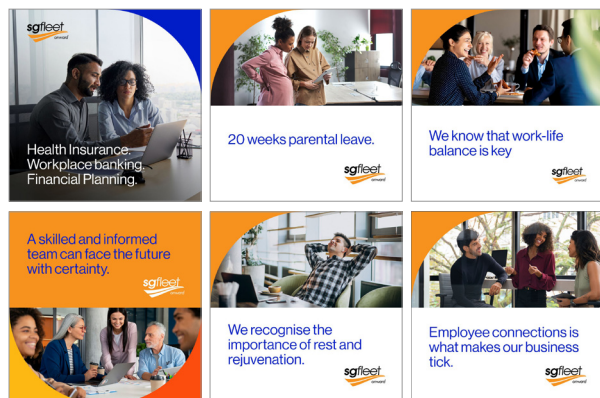
SG Fleet respects and seeks to further the interests of its customers, its employees, and the wider communities in which we operate. Our culture is one of trust, respect, care, and responsibility, and we aim to apply this in all our interactions with every individual, as well as with community groups.

SG Fleet's ESG Materiality Assessment identified the following social risks as material to the company:

- Working conditions (employment) and training
- Occupational health & safety
- Diversity, non-discrimination, and equal opportunity
- Customer privacy and data security

Risks that are perceived as relevant to the wider community, even if not directly material to SG Fleet due to the nature of its business, are:

- Support of indigenous communities
- Human rights, including forced, compulsory, or child labour in the company and its supply chain (Modern Slavery)



Working Conditions

SG Fleet's success as a business and its ability to deliver excellence in services and products to its customers relies on a motivated workforce. We believe in creating a positive work environment that is respectful, supportive, and engaging.

During the 2024 financial year, the company introduced a range of additional staff benefits and stepped up its program of team-building activities and social events to bring our people together.

At SG Fleet, we understand that a sound work/life balance is key. We offer opportunities for a hybrid work environment, allowing our people to thrive in a flexible model that can blend in-office collaboration with the convenience of working from home.

The company has a collaborative and supportive culture where people are empowered to be the best they can be. We believe in celebrating their positive impact and have implemented a service recognition program that acknowledges and rewards their dedication. A separate award program also recognises staff for their commitment to the company values of Innovation, Collaboration, Excellence, and Trust.

Rest and rejuvenation are an important element of healthy working conditions. SG Fleet offers up to four extra days of paid leave on top of our staff's annual allowance, up to three days of paid leave to attend fertility appointments, 20 weeks of paid primary parental leave and six weeks of paid secondary carer leave (up from ten and two weeks previously).

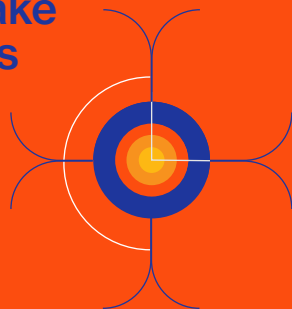
The company also offers workplace banking services and discounted health insurance.

Future Focus

SG Fleet will continue to implement strategies and initiatives that support role and work flexibility and introduce further benefits that ensure the company's workplace fosters a healthy culture and protects the wellbeing of its people.

Employee

**connections
are what make
our business
tick**



Training

SG Fleet is committed to supporting the continued growth of its people. We have a reputation within the industry of developing the best available talent and expertise. We provide formal and informal advancement and learning opportunities that recognise and grow the ability, capacity, and leadership skills of our people.

In the 2024 financial year, SG Fleet continued its significant investment in Learning and Development arrangements, launched in the second half of the previous financial year.

Initiatives introduced during the year included access to the LinkedIn Learning facility, which contains a digital library of over 21,000 courses covering a wide range of technical, business, software, and creative topics, as well as a Mentoring Program allowing senior executives to share knowledge and insights with other staff members.

LinkedIn Learning

The Gear Up people management program introduced in the previous year was rolled out again and an additional program was introduced for senior leaders. A dedicated yearly Learning and Development budget is now offered to every staff member, providing financial support to those wanting to develop their knowledge in areas relevant to their roles.



Training

**continued
education
process**



Future Focus

SG Fleet will continue to investigate opportunities to extend the range of its current training structures, both in terms of training topics and the ability of staff to access training. We will also implement additional initiatives to optimise the continued education process.

Social

Occupational Health and Safety

To champion our people, SG Fleet places their well-being as our top priority, and fosters a cooperative and supportive environment where our teams can thrive. We approach Occupational Health and Safety from a holistic perspective, going beyond simply ensuring safety in the workplace to include initiatives that foster the physical and mental health and wellbeing of our people at work and at home.

In addition to providing staff with a healthy work environment, we conduct regular e-training on a range of topics that can impact their wellbeing. These modules include sexual harassment prevention, work health and safety awareness, and workplace bullying and occupational violence. In addition to risk mitigation education, we encourage our people to proactively look after their health by providing access to a range of wellness benefits and activities, such as subsidised gym memberships and on-site classes.

In the 2024 financial year, SG Fleet introduced a new app-based Employee Assistance Program, Sonder, to ensure staff are getting the best level of support possible across many work/life areas. The Sonder app provides live support 24/7 via chat and phone calls. Services includes a nurse on call at all times, individually tailored mental health, medical and safety support, along with proactive resources around finances and cost of living, and health and safety topics. The app is available in multiple languages and all communications are fully confidential.

During the year, the company extended its ISO45001 OH&S Management certification of parts of its business to the entire SG Fleet Group.



SG Fleet actively supports community initiatives to raise awareness of the importance of good physical and mental health. In the 2024 financial year, amongst other initiatives such as Mental Health Month, the company recognised the R U OK initiative, encouraging its people to 'ask, listen, encourage action, and check in' with those in need of support. We also celebrated World Kindness Day, encouraging our people to spread kindness, anonymously or openly, to 'make the world a better place, one act of kindness at a time'.

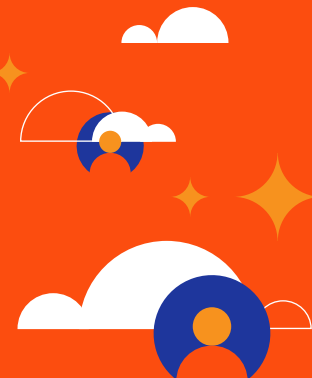


Future Focus

SG Fleet intends to investigate other occupational health and safety aspects within the workplace and in support of our employees outside the workplace and at home. Our focus will remain on supporting overall wellbeing, physical and mental, and on addressing specific assistance needs as they arise.

Focus on

supporting wellbeing, physical and mental



Diversity, Equal Opportunity, and Non-discrimination

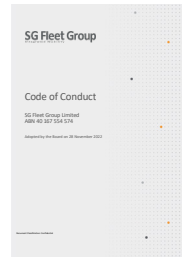
SG Fleet's business success is built on the expertise of its people. We recognise the importance of being an inclusive employer and have a strong commitment to equal opportunity and diversity. This drives the company's ability to attract, retain, and develop the best talent, create an engaged workforce, deliver the highest quality of service to customers, and achieve sustainable growth.

SG Fleet celebrates the diverse range of backgrounds and experiences of its employees and provides a welcoming work environment that is free from discrimination. The company's intranet provides a calendar of activities celebrating culturally significant events such as Pride Month, Harmony Week, World Food Day, Diwali, and others.

We proudly embrace the cultural diversity of our employees, whose background spans 60 countries, spread over six continents, with 66 official languages, and representing 70% of the world's population. The company celebrated United Nations Day on 24 October 2023, bringing its people together and showcasing SG Fleet's inclusion and diversity.



After launching the Women's Network in New Zealand and the United Kingdom in the previous period, SG Fleet introduced the Australian Chapter at the beginning of the 2024 financial year. The Women's Network acknowledges that our personal lives do not stop when we show up at work and that success is developed by a strong, diverse network of colleagues, mentors, and friends over time. In recognition of this, the company identified key topics for women related to the workplace and private life, which are covered in a series of events for our people, led by selected experts.



SG Fleet's Code of Conduct stipulates compliance with the letter and spirit of a full range of anti-discrimination laws to establish a workplace free from any kind of discrimination. The company conducts regular e-training on discrimination to reinforce awareness and correct behaviours.

SG Fleet complies fully with the Workplace Gender Equality Act (2012) and is a complying employer with the Workplace Gender Equality Agency. We conduct regular e-training on equal employment opportunity. As at 30 June 2024, the company's workforce was made up of 46% women and 54% men.



Future Focus

SG Fleet continues to work towards a diverse workforce, including balanced gender representation at Board and Senior Management level.

The company intends to widen its diversity focus to other areas in addition to gender, and ensure that a more diverse representation also translates into actual inclusion of more diverse opinions. We will also investigate further initiatives, including e-learning, that will help break down perceptions that foster discrimination. These efforts will be supported by the establishment of a Diversity Committee.

Diversity

towards
a diverse
workforce



Social

Indigenous Communities

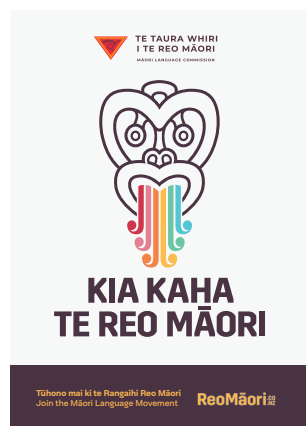
SG Fleet is committed to furthering wherever possible the cause of Aboriginal and Torres Strait Islander, Māori, and other indigenous communities in the geographies in which it operates. In addition to offering employment opportunities, the company actively supports indigenous business ventures. We are a proud member of Supply Nation, which aims to promote and support procurement through indigenous organisations and create a more inclusive economy.

As part of the tender process, our procurement staff check the Supply Nation Membership list for any relevant suppliers. Indigenous businesses are then invited to tender and evaluated amongst other bidders. We currently source a number of goods from these businesses.



In the 2024 financial year, SG Fleet appointed an Aboriginal social change agency to assist the company with the development of an effective and impactful Reconciliation Action Plan. The company also investigated opportunities to promote additional indigenous procurement and employment and intends to act on a number of these in the current year.

In New Zealand, our people gathered to celebrate Māori Language Week and embrace the beauty of this rich language and take a moment to remember the past, celebrate the present, and plan for the future.

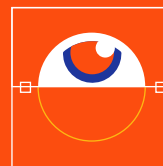


Future Focus

SG Fleet is aiming to build the right perspective amongst its leadership and its people in preparation for the establishment of the Reconciliation Action Plan. We will also continue to put a greater emphasis on supporting indigenous businesses and employment where practical and viable. Additional events and initiatives related to indigenous communities in both Australia and New Zealand will be included in our cultural activities calendar moving forward.

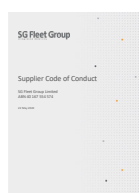
Build

the right perspective



Human Rights, and Forced, Compulsory, or Child Labour

As an office-based services company, SG Fleet's direct exposure to the risk of human rights infringement is limited. The company does however expect partners in its supply chain that are more likely to encounter human rights issues to take necessary measures to mitigate against this risk. Our Supplier Code of Conduct stipulates our expectations with regard to the conduct of suppliers in terms of modern slavery risks, the treatment of labour, and human rights generally.



SG Fleet's approach to ensure responsible internal conduct with respect to human rights centres on the training of staff on related topics, such as modern slavery, non-discrimination, and diversity and equal opportunity.

We do not tolerate any form of enslavement or exploitation and we are committed to ensuring measures are in place to minimise the risk of modern slavery in our business and in our supply chain. The company has voluntarily put in place a Modern Slavery Policy, which outlines our overall approach to combatting modern slavery.

In the previous period, SG Fleet embarked on a review of its supplier modern slavery survey approach, with the aim of broadening the assessment to a wider range of environmental, social, and governance (ESG) criteria. This new survey was launched at the end of the 2024 financial year (see 'Supply Chain Management' in the Governance section of this Statement).



SG Fleet issues Modern Slavery Statements overviewing its initiatives during the respective reporting periods in Australia (pursuant to the Modern Slavery Act 2018 (Cth)) and the United Kingdom (pursuant to the Modern Slavery Act 2015 (UK)). In Australia and the United Kingdom, SG Fleet staff receive yearly training on modern slavery risk awareness.



Suppliers

new Supplier ESG assessment



Future Focus

After launching its new Supplier ESG assessment process in the 2024 financial year, SG Fleet intends to further optimise the process by which it identifies modern slavery risks, as well as how any identified risks are investigated and addressed. We will also investigate the feasibility of selection criteria that take into account human rights management and behaviours of potential suppliers, as well as work with our existing suppliers to achieve better outcomes across a range of related aspects.

Social

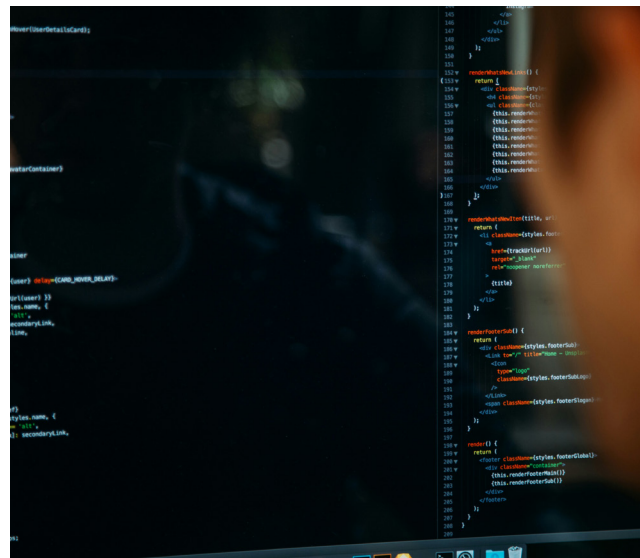
Customer Privacy

To be able to create value for its customers and conduct its business in an efficient manner, SG Fleet needs to collect and process certain personal and business information. The way we collect, use, and retain this information is governed by strict protocols and detailed processes. SG Fleet complies with all applicable privacy laws in each jurisdiction in which we operate and processes customer information in accordance with its privacy policies. Our Personal Data Protection Policy sets out how we protect the personal data we collect.

The awareness of the importance of customer privacy and the need for secure handling of data is reinforced at the individual employee level through regular staff updates and continuous training via our e-learning portal. The SG Fleet Group has ISO27001 Information Security Management certification.



During the 2024 financial year, the company continued to optimise its data privacy and security processes. SG Fleet remains dedicated to protecting the information entrusted to the company by further improving its privacy approach, for example through PII stale data discovery and obfuscation. Overall, IT security was enhanced via a number of measures, including regular penetration tests. The company met all relevant information security governance objectives, using targeted solutions, specialist personnel, and robust processes.



Privacy

enhance staff
data security
awareness



Future Focus

Further enhancements of SG Fleet's relevant processes will be introduced as the cyber security environment continues to evolve. The company will also enhance staff data security awareness by providing additional training and regular bulletins on how to identify potential threats.

Other Social Aspects

SG Fleet interacts with local communities in Australia, New Zealand, and the UK as a significant employer and as a purchaser of goods and services. We firmly believe that we have a responsibility to the communities in which we operate, as well as people elsewhere, to give back and make a positive contribution in other areas wherever we can.

SG Fleet supports a number of initiatives across a wide range of areas. As a company, our community contribution comes in the form of financial support and the provision of goods or vehicles. Our people also contribute generously by collecting donations or by volunteering in their own communities or for charitable activities of their choice. For that purpose, we offer staff the opportunity to take two volunteer leave days each year. Wherever possible, we look to deploy our mobility expertise to the advantage of organisations or individuals who have limited access to transport or to support road safety initiatives.

As in previous periods, we supported a wide range of initiatives in the countries in which we operate during the 2024 financial year. These included, amongst others, the Santos Wheelchair Rugby National Championship, Australia's Biggest Morning Tea, in support of cancer research, Kmart Whishing Tree Appeal, the Redkite kids cancer charity, Flannie Day, in support of Homelessness Week, the St. George Foundation, helping young people in local communities, Bear Cottage Children's Hospice, Friendship Circle, Whanau Awhina Plunket, providing support for children under five, Pink Shirt Day, in support of New Zealand's Mental Health Foundation, the Northland Emergency Services and Auckland Rescue Helicopter Trusts, Foster Hope Christmas Gift Drive, and the UK's Stand Up To Cancer Bake Off. Applying our mobility expertise and insights, we also provided support for National Road Safety Week in Australia and the corresponding initiative in New Zealand, Road Safety Week



Governance

Across our organisation, we ensure we adopt responsible business practices and policies in all aspects of our operations. As a listed entity, SG Fleet Group Limited also reports against the ASX Corporate Governance Council's Principles and Recommendations (4th Edition) via its Corporate Governance Statement. This statement describes the rules, systems and processes we have in place to manage our company and our operations in a responsible manner.

SG Fleet's ESG Materiality Assessment identified the following governance risks as material to the company:

- Business ethics and conduct
- (Presence of) whistle-blower policy
- Supply chain management
- Anti-corruption and bribery
- Anti-competitive behaviour
- Risk and crisis management

In addition to the requirements set out by the ASX Corporate Governance Council, we have a number of policies in place to instil and promote ethical behaviour across the organisation, as well as our supply chain. SG Fleet also ensures its people are aware and observant of these policies by conducting regular e-learning sessions.

Business Ethics and Conduct

Our people are expected to conduct themselves in a manner consistent with the company's standards and in compliance with all relevant legislation.

SG Fleet's Code of Conduct outlines how we expect our representatives to behave and conduct business in the workplace on a range of issues. It includes legal compliance and guidelines on appropriate ethical standards.

Future Focus

SG Fleet will continue to review its Code of Conduct as required, further improve the processes in place to ensure adherence to the Code, including training, and optimise how it addresses any breaches.

Further

**Improve
the process
in place**



Whistle-blower Policy

SG Fleet is committed to ensuring that serious misconduct or malpractice is identified and addressed appropriately. We believe that the ability to raise related concerns is an important mechanism to ensure that the company functions efficiently and in accordance with its own principles of conduct.

SG Fleet has adopted a Whistle-blower Policy in accordance with the Corporations Act in Australia, and a separate policy applies to the United Kingdom. The Whistle-blower Policies encourage staff to raise concerns and reportable conduct, where there are reasonable grounds to support such action and to ensure that serious misconduct or malpractice is identified and addressed appropriately.



Access to

whistle-blower process



Future Focus

SG Fleet's Audit, Risk, and Compliance Committee reviews its Whistle-blower Policy annually, and we will further improve employee awareness of and access to the whistle-blower process.



Governance

Supply Chain Management

We view it as our responsibility to promote ethical behaviour not just within our business operations, but also at supplier level. SG Fleet takes great care in selecting suppliers of goods and services and we expect our suppliers to operate to recognised national and international standards, and appropriate codes of practice.

In order to do so, we have put in place a Supplier Code of Conduct and a Procurement Policy. These policies set out the requirements we expect from our suppliers in the areas of ethical business practice, anti-competitive conduct, labour and human rights, work health and safety, environment, and confidentiality of information.

During the 2024 financial year, SG Fleet introduced a new methodology to assess the ESG performance of its suppliers. Whereas previously, the company's supply chain was surveyed with a focus on modern slavery, the survey was broadened to include all relevant environmental, social, and governance risks. This change in approach was the result of best-practice benchmarking, in cooperation with an external specialist consultant.

Supply chain

Review and management of other ESG risks



Future Focus

In addition to further optimising the process by which it identifies modern slavery risks in its supply chain (see 'Human Rights, and Forced, Compulsory, or Child Labour' in the Social section of this Statement), SG Fleet intends to take a similar approach to the review and management of other ESG risks and how the ESG performance of potential suppliers is taken into account in the company's supplier selection process.



Anti-corruption and Bribery

SG Fleet prohibits bribery and corruption in any form, whether direct or indirect, and in any country in which it operates. We have adopted an Anti-bribery and Corruption Policy, detailing our commitment to conducting business activities with integrity and ensuring measures are in place to prevent bribery and corruption. The company expects its employees to demonstrate honesty, integrity, and fairness in all aspects of their business dealings and exercise a high standard of professionalism and ethical conduct in all their activities.



We promote employee awareness of and compliance with our policies against bribery and corruption through appropriate dissemination of our own procedures, policies, and training programmes.

Future Focus

SG Fleet will continue to review its Anti-bribery and Corruption Policy as required, further improve the processes in place to ensure adherence to the Policy, including training, and optimise how it addresses any breaches.

Anti-competitive Behaviour

The company aims to maintain its reputation of having a high standard of ethical behaviour in conducting business and to behave with integrity in all dealings with competitors and customers.

SG Fleet's Code of Conduct stipulates the behaviours required to meet its standards in terms of responsible business practices. We actively monitor for any breaches of the Code. In the reported period, no actions or issues occurred in respect of anti-competitive behaviour.

Future Focus

SG Fleet will continue to review its Code of Conduct as required, further improve the processes in place to ensure adherence to the Code, including training, and optimise how it addresses any breaches.

Other Governance Aspects

Visit our Investor Centre to read our Corporate Governance Statement, which covers a number of additional governance aspects.

Risk and Crisis Management

The presence of effective risk management structures and processes is essential for the continued conduct of SG Fleet's business operations. SG Fleet has a strong risk management culture and a robust operating model, imbedding governance and risk responsibilities across multiple lines of defence.

We maintain a combined Audit, Risk, and Compliance Committee as a subcommittee of the company's Board, as well as a dedicated internal audit function. The Committee reviews the company's risk management framework and internal control framework, while the internal audit function provides the Board and management with independent and objective assurance on the effectiveness of governance, risk management, and internal control processes.



Future Focus

SG Fleet will continue to review its risk management approach and processes in line with the evolving nature of its business and its operational environment.

UN Global Compact

During the 2021 financial year, SG Fleet became a signatory to UN Global Compact (UNGC), committing to its corporate responsibility initiative and its principles in the areas of human rights, labour, the environment, and anti-corruption.

In the 2024 financial year, the company lodges its third Communication on Progress report.



