



Human Rights Policy

Australia & New Zealand

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1 Purpose

Penske is committed to uncompromising integrity in all that we do and how we relate to each other, our customers, and our business partners. Upholding human rights is a vital part of that commitment. This Policy sets out the principles which guide our practices impacting human rights.

2 Field of Application

This document applies to directors, employees, and contractors (including employees of contractors) of Penske Transportation Group Pty Limited and its subsidiaries in Australia and New Zealand (**Penske**).

3 Definitions

Term	Definition
Modern slavery	Modern slavery describes situations where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom. It is a crime and a violation of fundamental human rights. It can take various forms, including: <ul style="list-style-type: none">• trafficking in persons;• slavery;• servitude;• forced marriage;• forced labour;• debt bondage;• deceptive recruiting for labour or services; and• the worst forms of child labour. (As described in the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities published by the Australian Government Department of Home Affairs.)
Penske	Penske Transportation Group Pty Limited and its subsidiaries in Australia and New Zealand.
Worker	Any person who undertakes work for Penske (whether as an employee or contractor).
Worst forms of child labour	Situations where children are subjected to slavery, or similar practices, or engaged in hazardous work.

4 Policy Statement

Penske supports the intent of the *UN Guiding Principles on Business and Human Rights* as well as related international conventions, treaties, and protocols. We are committed to protecting our organisation and workers at risk of modern slavery or human trafficking both:

- in our operations and supply chain; and
- whether those workers are our direct employees or those who do work for us via third party suppliers.

Penske takes a zero-tolerance approach to inaction against modern slavery and human trafficking and seeks to work towards ensuring modern slavery is not taking place anywhere within our operations or in any of our supply chains. Although not included in the definition of modern slavery, Penske is aware that practices such as substandard working conditions or underpayment of workers can escalate into modern slavery. We, therefore, also does not tolerate the continuation of these practices.

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5 Supplier conduct

While performing work for Penske, we expect suppliers to adhere to all applicable anti-slavery, human trafficking, workplace, and anti-discrimination laws. We also expect suppliers to apply the principles set out in this Policy to their workers.

6 Modern slavery

Penske acknowledges that combatting human rights issues takes a concerted effort. We are committed to doing our part by reporting on the risks of modern slavery in our operations and supply chain under the *Modern Slavery Act (Cth) 2018* as well as other similar laws which apply to us.

Penske will continually assess and improve how we reduce the risk of modern slavery practices within our supply chains and operations.

7 Fair treatment

Penske supports the *ILO General Principles for Fair Recruitment* in our recruitment practices. We are committed to upholding the following principles:

7.1 Forced or Involuntary Labour

Workers will not be subject to any form of forced labour. All work must be voluntary, and workers must have the freedom to terminate their employment working relationship at any time without penalty on reasonable notice.

7.2 Document Retention

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documents, is strictly prohibited. The retention of personal documents must not be used as a means to bind workers to employment or to restrict their freedom of movement.

7.3 Contracts of Employment

Written contracts of employment or contracts for services must be provided to all workers:

- in a language they understand; and
- clearly setting out their rights and responsibilities about payments, wages, working hours, and employment conditions.

7.4 Deposits

Workers must not be required to lodge deposits or security payments at any time to secure work.

7.5 Workers Equality

All workers must be treated fairly and without unlawful discrimination. No worker will be treated any less favourably than others. However, nothing in this Policy prohibits reasonable and objective differentiation between workers or the appropriate recognition of skills and qualifications.

7.6 Humane Treatment

The workplace must be free of any form of harsh or inhumane treatment.

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Disciplinary policies and procedures must be clearly defined and communicated to all workers. They must not include any inhumane punitive measure, including mental or physical coercion, verbal abuse of workers, or compulsory labour. Unless permitted by law, disciplinary policies and procedures must not result in wage deductions (or reductions in benefits).

Threats of physical or sexual violence, harassment, and intimidation against a worker, his or her family, or close associates are strictly prohibited.

7.7 Wages and Benefits

All workers must be paid at least the national minimum wage and must be provided all legally mandated benefits. Wage payments must be made at regular intervals, directly to workers, and must not be delayed, deferred, or withheld. Only deductions, advances, or loans authorised by law are permitted. Clear and transparent information must be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. All workers must retain full control over their earnings. Wage deductions must not be used as a disciplinary measure or to keep workers tied to their employment or their jobs.

7.8 Working Hours

No worker may be:

- forced to work more than the number of hours permitted by law
- made to work overtime under threat of penalty, dismissal, or denunciation to authorities; or
- forced to work overtime as a disciplinary measure.

7.9 Freedom of Movement and Personal Freedom

Workers must have freedom of movement. No worker's personal freedom may be unreasonably or coercively restricted.

7.10 Labour Hire

Labour agencies engaged for recruitment or hiring:

- must be licensed wherever required by law; and
- must not engage in fraudulent behaviour, placing the worker at risk of forced labour or trafficking for exploitation.

8 Speak Up!

Penske has an established Speak Up system in place to ensure that anyone can raise concerns about actual or suspected misconduct or an improper state of affairs without fear of reprisal or retaliation. For information about how to report a breach, or potential breach, by Penske or its suppliers of any applicable anti-slavery and human trafficking law:

- employees can go to the Compliance Team Room's Speak Up! page; and
- suppliers (including their employees) can go to <https://penske.com.au/compliance-legal/>.

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9 Applicable Documents

Name	Location
PAU.COR01.010 0Australian Whistleblower Policy	Podium/resources/Business documentation/PAU
G.COR03.003 Grievance Procedure	Podium/resources/Business documentation/All
G.COR01.014 Conflicts of Interest Policy	Podium/resources/Business documentation/All
G.HR01.002 Group EEO and Prevention of Harassment Policy	Podium/resources/Business documentation/All
G.HR01.017 Leave Policy AU	Podium/resources/Business documentation/All
PNZ.HR01.019 Leave Policy NZ	Podium/resources/Business documentation/PNZ
PCV.COR01.002 Code of Ethical Conduct	Podium/resources/Business documentation/PCV
PPS.COR01.002 Code of Ethical Conduct	Podium/resources/Business documentation/PPS

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Amendments

Please Note:

- The issue of an update invalidates the previous issue;
- The currently valid version of the Policy can be accessed on the intranet;
- Hard copy print-outs are not covered by any subsequent amendments;
- Always verify that the version is current before using the information contained therein.