



## Modern Slavery Statement

NISSAN AUSTRALIA 2022

# Contents

## **Section 1**

Structure and operations	5
--------------------------	---

---

## **Section 2**

Supply chains	6
---------------	---

---

## **Section 3**

Risks of modern slavery in Nissan's operations and supply chains	7
--	---

---

## **Section 4**

Controls to address Nissan's modern slavery risks	8
---	---

---

## **Section 5**

How we assess the effectiveness of actions taken	14
--	----

---

## **Section 6**

Consultation Process	15
----------------------	----

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# Introduction

This is Nissan's third modern slavery statement (**Statement**), provided under section 14 of the *Modern Slavery Act 2018* (Cth) (the **Act**).

The single joint Statement covers the following Nissan group entities:

- Nissan Motor Co. (Australia) Pty Ltd (**NMA**)
- Nissan Financial Services Australia Pty Ltd (**NFSA**)
- Nissan Casting Australia Pty Ltd (**NCAP**)

(collectively, **Nissan**).

Nissan, as part of the global Nissan group, is committed to establishing and adhering to the highest ethical standards. We conduct our business activities with a constant awareness of society's needs and our social responsibility to contribute to a cleaner, safer and more inclusive world. Respect for human rights within our business, and the establishment of a sustainable supply chain with due regard for human rights, is a core element of our global sustainability strategy. Nissan strives to continuously improve our understanding and management of human rights risks. We will not tolerate any forms of slavery or human trafficking in our business or supply chains.

This Statement describes Nissan's structure, operations, supply chains, modern slavery risks and controls during the period 1 April 2021 to 31 March 2022 (the **Reporting Period**) as required under the Act. It provides an update on the new controls Nissan has implemented to minimise its modern slavery risks as committed to in our modern slavery statement for 2021 (**2021 Statement**).





## Section 1

# Structure and operations

Where Nissan's structure, operations and supply chain have remained the same as that set out in our 2021 Statement for the Reporting Period, we have re-stated this below.

NMA, NFSA and NCAP all share the same ultimate holding company, Nissan Motor Co Ltd (**NML**), which is based in Japan.

NCAP and NMA are fully owned by Nissan International Holdings BV in the Netherlands. NFSA is fully owned by NMA.

### a) NMA

During the Reporting Period, NMA engaged in the importation, sale and distribution of Nissan branded motor vehicles, parts and accessories and INFINITI branded parts and accessories (**Nissan Products**) in Australia.

NMA has a network of authorised franchise dealers (**Dealers**) across Australia who have a Dealer Agreement with NMA under which they purchase Nissan Products from NMA, and sell, and offer repair and maintenance services in relation to Nissan Products to customers.

During the Reporting Period, NMA's headquarters were based in Mulgrave, Victoria. NMA also had regional offices in:

- Victoria (co-located at NMA's headquarters)- to support Dealers located predominantly in Victoria and Tasmania;
- New South Wales - to support Dealers located predominantly in NSW and ACT;
- Queensland - to support Dealers located predominantly in Queensland;
- Western Australia - to support Dealers located predominantly in Western Australia, and also Northern Territory, North West Victoria, South West NSW and South Australia; and
- South Australia - to further support Dealers located predominantly in South Australia, Northern Territory, North West Victoria, South West NSW and Western Australia.

At the commencement of the Reporting Period, NMA had 201 employees.

### b) NFSA

NFSA trades under the business names of: Nissan Financial Services; Mitsubishi Motors Financial Services; Renault Financial Services; and Skyline Car Finance. Its principal activities are to provide:

- Regulated consumer loans and commercial finance to retail customers;
- Branded credit and vehicle related insurance products to NFSA customers;
- Fleet facilities to approved corporate entities; and
- Wholesale and bailment finance to approved motor vehicle dealerships.

During the Reporting Period, its head office was co-located with NMA.

At the commencement of the Reporting Period, NFSA had 219 employees.

### c) NCAP

NCAP manufactures aluminium castings to be used in the manufacture of Nissan electric vehicles, light trucks and commercial passenger vehicles for the Renault, Nissan, Mitsubishi Alliance Group, which are sold internationally, including in Japan, USA, Thailand and Mexico. In addition, NCAP manufactures towbars for all locally sold Nissan vehicles.

NCAP's manufacturing plant is located at 209-235 Frankston - Dandenong Rd, Dandenong South in Victoria. It employed 131 full time employees and up to 80 casual staff (fluctuating based on demand) during the Reporting Period and operates three shifts a day, five days per week.



## Section 2

# Supply chains

Nissan had more than 1,000 suppliers during the Reporting Period, which include both local and overseas suppliers, and suppliers of goods and services.

### a) NMA

All vehicles NMA distributes and sells in Australia are imported and are manufactured in plants operated by Nissan affiliated companies in various countries, including in Japan, Thailand, UK and USA. Each of these manufacturing plants is subject to global Nissan compliance policies and procedures that include controls regarding responsible labour practices<sup>1</sup>.

NMA also sources replacement parts and accessories for Nissan vehicles from overseas suppliers, some of which are Nissan affiliated entities and others are independent third party manufacturers. These suppliers are located in countries including Japan, New Zealand, USA, Thailand, Netherlands and France.

During the Reporting Period, NMA had more than 600 suppliers of goods and services to support its Australian operations. The suppliers of goods include vehicle, parts and accessory suppliers, suppliers of goods for the Dealers (e.g signage) and a range of products for general corporate use. NMA also procured a range of services, including vehicle delivery services, warehousing services, corporate services such as advertising and marketing services, and professional advisory services.

### b) NFSA

During the Reporting Period, NFSA used 97 suppliers, most of which were based in Australia, with most being suppliers of services rather than goods. These services included financial services, credit reporting services, debt recovery services, insurance services, marketing services and professional advisory services such as IT, accounting and legal services.

NMA, NCAP and NFSA also outsource their accounts payable functions and general ledger services to a Nissan affiliated company in India.

### c) NCAP

During the Reporting Period, NCAP had more than 300 suppliers, 96% of which were based in Australia, and 4% overseas (including in Japan, South Korea, USA, Germany, Switzerland, Netherlands, China and Italy).

NCAP obtained raw materials (including aluminium) for its manufacturing operations through brokers who source the materials from raw materials suppliers. Whilst some are local, the majority are based overseas, including in Japan, China, Indonesia, Malaysia and South Korea.

In terms of services, NCAP sources various corporate services locally, including marketing, insurance, facilities, utilities, transport, logistics and professional advisory services. It also uses third party suppliers of labour hire services to manage its manufacturing-related workforce.

<sup>1</sup> Further information regarding these controls is detailed in the "Controls" section below.

## Section 3

# Risks of modern slavery in Nissan's operations and supply chains

As set out in Nissan's first modern slavery statement, in 2019 as part of our commitment to modern slavery compliance, Nissan engaged an independent adviser to undertake a detailed review of modern slavery practices across Nissan's Australian operations and supply chains. This included an assessment of the sectors and industries in which our suppliers operated during the 1 April 2019 to 31 March 2020 reporting period, as well as their geographic locations. There have been minimal changes to our operations and supply chains in this Reporting Period.

### a) Operations

The risks of modern slavery in Nissan's Australian operations remain low for this Reporting Period. There is no known vulnerability to modern slavery in its activities (the distribution of vehicles, the provisions of financial services and manufacturing), and these sectors remain highly regulated in Australia.

### b) Supply chains

For NMA, some of the overseas countries from which it sources Nissan Products, such as Thailand and India, have been assessed by the Global Slavery Index<sup>2</sup> as having a medium to high vulnerability of modern slavery. While these countries have an inherently higher risk of modern slavery, NMA primarily sources Nissan Products from Nissan affiliated companies who are subject to Nissan global policies regarding responsible procurement<sup>3</sup>.

NFSA's supply chains have been assessed as having a low risk of modern slavery, as the bulk of its procurement activity is focussed on obtaining corporate services from large, well-known Australian-based service providers, where the modern slavery risks are inherently low. In situations where services are procured from overseas suppliers, these are in most cases through well established and large global organisations. Nissan endeavours to obtain evidence of suppliers' own ethical position and governance around the identification and minimisation of modern slavery risk.

The main theoretical modern slavery risks in NCAP's supply chains relate to the significant volume of raw materials that it sources indirectly (via brokers) from countries that have been rated as having a medium risk of modern slavery (e.g China and Malaysia).

<sup>2</sup> See <https://www.globalslaveryindex.org/2018/data/maps/#prevalence>.

<sup>3</sup> Further information regarding these global controls is detailed in the "Controls" section below.

## Section 4

# Controls to address Nissan's modern slavery risks

Nissan has a number of formal policies and controls in place designed to promote ethical and legally compliant business conduct and minimise the risk of modern slavery in our operations and supply chains. In our 2021 Statement, we detailed a number of the actions Nissan had taken to introduce new controls and strengthen our policies and processes to assess and minimise the risk of modern slavery in our supply chains. We have set these out below as well as providing an update on actions and improvements undertaken in the Reporting Period.

### **a) Supplier contracts**

Nissan's standard contracts for the procurement of goods and services contain specific provisions requiring its suppliers to:

- comply with all applicable modern slavery laws;
- take all necessary steps to ensure that there is no modern slavery in their supply chains;
- implement and maintain appropriate due diligence procedures for their own suppliers;
- notify Nissan of any suspected modern slavery in their supply chains; and
- keep records to trace the supply chain of all goods and services provided to Nissan.

In addition, our standard contracts expressly require suppliers to comply with our Supplier Code of Conduct and associated policies and procedures.

During the Reporting Period, we have taken steps to incorporate the above requirements when renewing supplier contracts based on our older standard contract terms, and also when negotiating contracts using third party contract terms.

Nissan will continue to regularly review our standard contracts to ensure that they are updated from time to time in line with current legal and regulatory requirements.

### **b) Corporate Procurement Policy, due diligence and tendering process**

The Corporate Procurement Policy is designed to guide the procurement of goods and services with processes underpinned by fairness, accountability and transparency. It guides Nissan's Procurement Department in its dealings with suppliers.

In the period 1 April 2020 to 31 March 2021 (FY2020), the Policy was updated to:

- contain processes to assess suppliers' modern slavery compliance practices prior to their engagement/selection. This has been incorporated into Nissan's tender evaluation processes and documents, including targeted questions regarding modern slavery in our revised due diligence questionnaire;
- integrate principles regarding responsible labour and procurement practices from the global "Renault-Nissan Corporate Social Responsibility Guidelines for Suppliers" to ensure that these principles clearly form part of our local control framework;
- expressly refer to the Nissan SpeakUp Line for the reporting of any concerns; and
- integrate Nissan's new "Small Supplier Payment Policy" (discussed at section 4.g) below).

During this Reporting Period, the Policy was further updated to expressly refer to the Supplier Code of Conduct and the Nissan Procurement webpage.



Further, Nissan is focused on enhancing our internal processes in respect to the assessment, monitoring and management of modern slavery risks and is working towards the implementation of a new sourcing and contracting IT system. The new IT system will enable Nissan to collect and assess information regarding each prospective and existing supplier's modern slavery risk, as well as their commitment to various other environmental and social responsibility factors. For example:

- The global location of the head operating company and the contracting entity
- Evidence of any modern slavery policy
- Acceptance of Nissan's Supplier Code of Conduct
- Evidence of any environment policy that outlines sustainable business practices
- Evidence of any domestic violence policy
- Whether the supplier is an Australian disability enterprise
- Whether the supplier is an Indigenous supplier
- Evidence of policies which promote gender equality

During this Reporting Period, we commenced developing an internal Modern Slavery Risk Matrix, which we intend to use in conjunction with the new IT system, to help identify and assess the potential modern slavery risk levels for existing and potential new suppliers.

Nissan aims to have the new IT system for sourcing and contracting implemented in the next reporting period, as well as finalisation of the Matrix. Once implemented, Nissan also intends to regularly review and update our Policy where necessary to reflect these processes.

Nissan will continue to focus and take steps to strengthen our due diligence procedures for new suppliers and to better understand modern slavery risks in respect to our current suppliers.

### c) Supplier Code of Conduct

Nissan implemented its Supplier Code of Conduct in FY2020. We sent a copy of the Code to all of our current suppliers, advising that we expect our suppliers to review the Code and self-assess their compliance with it. Suppliers were required to sign and return a form acknowledging the Code and committing to comply with it. In this communication, we also directed our current suppliers to our new Nissan Procurement webpage.

All prospective and current suppliers can access the Code from the Procurement webpage. Prospective and new suppliers are also required to fill out a New Vendor Form located on the webpage to enable Nissan to assess whether the supplier meets Nissan Group requirements. The New Vendor Form provides that compliance with the Code is mandatory.

The Code covers a range of compliance and ethical topics that Nissan requires its suppliers to adhere to. It includes strict modern slavery obligations and Nissan requires its suppliers to commit to these obligations.

### d) Nissan Procurement webpage

Nissan also launched the Nissan Procurement webpage in FY2020 which is a dedicated page for suppliers on Nissan's website. It provides detailed information on Nissan's expectations of its suppliers and their supply chains. The webpage contains direct links to the Supplier Code of Conduct, New Vendor Form, Small Supplier Payment Policy, Whistleblowing Policy and SpeakUp Line.

### e) NCAP raw materials

Nissan sent communications to our raw materials suppliers in FY2020:

- advising of Nissan's expectation that suppliers support the protection of human rights of workers, as well as individuals and communities affected by their activities; and



- requesting information about their policies and controls from a modern slavery compliance perspective by way of completing a modern slavery questionnaire.

The responses received indicated that the relevant suppliers had implemented modern slavery policies and processes and no concerns were identified.

As set out above, Nissan is continuing to develop the internal criteria for assessing supplier responses to provide a risk rating for modern slavery risks and appropriate risk mitigation strategies by way of development of a Matrix.

#### **f) NCAP labour hire arrangements**

NCAP undertook a tender for its labour hire provider in FY2020. The chosen labour hire provider was subject to the updated due diligence process in the tender and assessed on its modern slavery policies and controls. The labour hire contract includes express obligations in respect to modern slavery compliance and compliance with Nissan's Code.

#### **g) Nissan Small Supplier Payment Policy**

Nissan introduced a new "Small Supplier Payment Policy" in FY2020 enabling current eligible small business suppliers and new suppliers to apply for shorter payment terms. Nissan is aware of the significant financial strain small businesses face and the consequential impacts for its workforce, in particular vulnerable workers. The purpose of this Policy is to assist small businesses with financial viability and cashflow.

Suppliers can access an application and the Policy via the Nissan Procurement webpage.

#### **h) SpeakUp System and Whistleblower Policy**

NML introduced SpeakUp in 2017 as a whistleblower hotline<sup>4</sup>. The SpeakUp Line is

an avenue by which employees and suppliers can report violations of Nissan's policies or laws and regulations. It is managed by a third party contracted by NML. It allows for the collection, investigation and resolution of various types of complaints, including complaints related to allegations of potential human rights abuses.

Nissan implemented a Whistleblower Policy on 1 January 2020<sup>5</sup>. The Whistleblower Policy also applies to suppliers (including their employees, contractors, consultants and service providers) and provides certain protections for reports regarding conduct by Nissan or its related body corporates that a whistleblower observes or reasonably suspects to be illegal, unethical or otherwise improper.

Nissan is committed to thoroughly investigating, addressing and responding to concerns raised, and protecting whistleblowers from retaliation.

Nissan actively promotes the SpeakUp Line and Whistleblower Policy to:

- its current suppliers as part of a communication advising Suppliers of the Nissan Procurement webpage; and
- prospective and new suppliers, by the Nissan Procurement webpage which expressly refers to the SpeakUp Line and the Whistleblower Policy.

#### **i) Training**

All Nissan employees are required to sign and comply with Nissan's Code of Conduct. The Code of Conduct sets Nissan's expectations as to how all its staff conduct themselves, and covers a wide range of topics. The sections of the Code that are relevant to modern slavery include the requirement for all staff to:

- treat colleagues, customers, suppliers and business partners with respect, dignity, fairness and courtesy;
- maintain fair and open relationships with business partners and suppliers;
- engage in practices and business

<sup>4</sup> See <https://secure.ethicspoint.eu/domain/media/en/gui/103583/index.html>

<sup>5</sup> See [https://www.nissan.com.au/content/dam/Nissan/AU/Files/Nissan\\_Australia\\_Whistleblowing\\_Policy.pdf](https://www.nissan.com.au/content/dam/Nissan/AU/Files/Nissan_Australia_Whistleblowing_Policy.pdf)

transactions that are lawful, fair and competitive; and

- reject unethical or illegal business practices or actions.

All staff are required to undergo Code of Conduct training annually which contains theoretical business situations designed to ensure staff understand how to apply these principles in their day-to-day work and sign a commitment to comply with the Code of Conduct. Nissan Executives and employees must respect the human rights of others and may not discriminate against or harass others based on race, nationality, gender, religion, disability, age, place of origin, gender identity, sexual orientation or for any other reason; nor may they allow such a situation to go unchecked if discovered.

During the Reporting Period, the Code of Conduct training (updated during FY2020) was available in approximately 20 different languages with a 96.10% global completion rate of indirect employees. Factory-focused training material was prepared for factory workers who received training via regular shift-start messaging or in a seminar setting. The global completion ratio of factory workers was 97.8%.

In addition to our mandatory annual Code of Conduct training, in December 2020, our independent adviser provided training on modern slavery compliance to our Management Operating Committee, Procurement and HR teams and other relevant stakeholders across Nissan.

Training on modern slavery will continue to be given annually to the Procurement and HR teams and other relevant decision makers.

During the Reporting Period, Nissan finalised the development of an e-learning on-boarding session for all new employees at Nissan which includes a component on modern slavery compliance. In the next reporting period, Nissan intends to launch the session as mandatory for all new employees, as well as relevant managers and stakeholders in the Procurement and HR teams.

The second annual Nissan Ethics Day was also held on 9 December 2021. This event was for all employees and shines a spotlight on

the importance ethics and compliance plays across the group.

In the next reporting period, NML is also launching globally an e-learning session specifically on Human Rights to deepen knowledge and awareness of human rights in the business. This session will be mandatory for all Nissan employees.

### j) Compliance Committee

Compliance with the law and the Code of Conduct for Nissan is governed by the Regional Compliance Committee (AMIEO) under the oversight of our Global Compliance Committee. The Regional Compliance Committee (AMIEO) is an executive committee comprised of senior representatives of the Compliance, HR, Finance, Legal and Audit functions and chaired by the Senior Vice President for Sustainability, Corporate Governance, Legal, External Affairs & Communications. It meets quarterly. The Regional Compliance Committee's responsibilities include to:

- Approve and review annual compliance programs/initiatives and compliance risk assessment results;
- Ensure adequate controls are put in place to mitigate risks;
- Monitor SpeakUp Line statistics and ensure that compliance reports are investigated and appropriate corrective actions are implemented.

There were no reports relating to modern slavery reported to the Regional Compliance Committee (AMIEO) for Nissan during this Reporting Period.

### k) Nissan Global Policies and Procedures

A significant proportion of the goods and services procured by Nissan are sourced from Nissan affiliated companies overseas, who operate under the direction and control of Nissan's parent company, NML.

Since January 2004, NML has participated in the United Nations Global Compact, a



corporate responsibility initiative built around universal principles regarding human rights, labour, the environment and anticorruption.

NML has also published its "Nissan Human Rights Policy Statement"<sup>6</sup>, which it expects all of its employees to respect.

To ensure that NML's suppliers act responsibly and ethically, in December 2015, it published the "Renault-Nissan Corporate Social Responsibility Guidelines for Suppliers"<sup>7</sup>. NML requests all suppliers who receive this to sign a "Supplier Commitment" to these guidelines accepting its terms and conditions. Section 2.2.3 of the Guidelines ("Human Rights and Labour") prohibits child labour, forced labour, and requires adherence to local laws regarding remuneration and working hours. Section 3.2.2 of the Guidelines ("Assessment") also provides that Nissan may ask a supplier to take a compliance assessment conducted by a third party. NML evaluates its supplier's sustainability activities, including respect for human rights, through third party assessment.

To help suppliers review their corporate activities from a sustainability perspective and take sustainability actions, the Guidelines explain expected initiatives in respect to a number of categories including Human rights and Labor: Prohibition of child labor and forced labor, complying with working hours and remuneration laws etc.

In addition, suppliers are requested to undergo assessments by third parties. The Guidelines mandate that suppliers comply with laws and regulations. If suppliers are found to be in a state of non-compliance, the Guidelines prescribe required responses, such as filing a report immediately, conducting an investigation and formulating corrective measures. In fiscal year 2020 no human rights violation was recorded and no supplier was found to be at serious risk of engaging in forced labour or child labour.

NML has also:

- implemented the "Nissan Global Guideline on Human Rights (June 2021)"<sup>8</sup> which supports the "Nissan Human Rights Policy Statement" and outlines specific initiatives

for respecting human rights, with the aim of ensuring compliance with the policy statement. Based on this guideline, Nissan is further strengthening its initiatives to respect the human rights of its employees on a global level. At every level of NML's global supply chain, it aims to conduct ethical, social and environmentally conscious business activities. NML also works together with suppliers, contractors and other business partners to achieve this goal.

- revised its "Nissan Human Rights Policy Statement" in July 2021<sup>9</sup>.
- issued its "Sustainability Report 2021"<sup>10</sup> which outlined its efforts toward a cleaner, safer and more inclusive society. It set out how NML is strengthening its focus on human rights and defines both its long-term vision and its shorter term goals up to 2022, which include to:
  - enhance monitoring of each compliance risk area and establish a framework to oversee progress of each monitoring activity;
  - enhance third party compliance systems to ensure the entire Nissan business process is compliant; and
  - ensure that all suppliers follow the Renault-Nissan CSR Guidelines for Suppliers.
- issued its "Sustainability Report 2022"<sup>11</sup> which details NML's Environmental, Social and Governance related initiatives and results during the Reporting Period. Relevant extracts include:
  - *"In the process of formulating the long-term vision Nissan Ambition 2030 announced in November 2021, many executives, including the CEO, engaged in lively discussions on various issues and initiatives related to human rights. The participants reaffirmed their commitment to further strengthen their efforts to respect human rights and ensure that they are put into practice in order to realise our corporate purpose".*

<sup>6</sup> See [https://www.nissan-global.com/COMMON/DOCS/CSR/LIBRARY/nissan\\_human\\_rights\\_policy\\_e.pdf](https://www.nissan-global.com/COMMON/DOCS/CSR/LIBRARY/nissan_human_rights_policy_e.pdf)

<sup>7</sup> See [https://www.nissan-global.com/EN/DOCUMENT/PDF/SR/CSR\\_Alliance\\_Guidelines.pdf](https://www.nissan-global.com/EN/DOCUMENT/PDF/SR/CSR_Alliance_Guidelines.pdf)

<sup>8</sup> See [https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/HUMAN\\_RIGHTS\\_GUIDELINE/ASSETS/PDF/Nissan\\_Global\\_Guideline\\_On\\_Human\\_Rights\\_e.pdf](https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/HUMAN_RIGHTS_GUIDELINE/ASSETS/PDF/Nissan_Global_Guideline_On_Human_Rights_e.pdf)

<sup>9</sup> See [https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/HUMAN\\_RIGHTS/](https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/HUMAN_RIGHTS/)

<sup>10</sup> See <https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/#link>

<sup>11</sup> See <https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/SR/2022/>

*– In fiscal 2021, a special project team for human rights was established reporting directly to the CEO. For about eight months, team members selected from various departments across the company exchanged opinions with external experts, confirmed social trends and demands and discussed the direction Nissan should take. The team's proposal was submitted to and approved by the Executive Committee, the company's highest decision-making body. The proposal defines "Nissan's Human Rights Want-to-be Statement" and clarifies key issues, measures, and internal systems for strengthening human rights management. Going forward, Nissan will work to install the "Nissan's Human Rights Want-to-be Statement" throughout the company and promote even fuller respect for human rights on a global scale."*

*– In fiscal 2021, no human rights violations, such as discrimination, occurred and no supplier was found to be at serious risk of forced labor or child labor".*

*– Among newly selected suppliers in fiscal 2021, 100% of them met both Nissan's social standards and basic environmental principles"*

*– In fiscal 2021, there were no suppliers whose compliance was problematic and no supplier contract was terminated for such a reason".*

For the next reporting periods, where appropriate, Nissan will look to integrate the principles from these NML global policies regarding responsible labour and procurement practices and human rights into our local control framework.

## I) Global Human Rights Risk Review of Specific Nissan Group Companies

As part of NML's sustainability strategy "Nissan Sustainability 2022", NML has cooperated with Business for Social Responsibility (BSR), a US organisation promoting sustainability, to implement a human rights assessment, allowing NML to identify four key areas of potential risk related to human rights, namely:

- supplier labour conditions;
- employee labour conditions;
- product safety; and
- customer privacy.

In 2019, NML worked with BSR to conduct a human rights assessment at Nissan South Africa (Pty) and determined that human rights risks were low at that company. In FY2020, NML expanded on its human rights assessment reviews of affiliated companies in the ASEAN area, conducting such reviews at Nissan Motor Thailand (NMT) and group companies (Nissan Powertrain (Thailand) Co., Ltd. And SNN Tools & Dies Co., Ltd.). Action plans were formulated to remediate items identified as requiring improvement and the companies are executing those action plans to make improvements on an ongoing basis.

In the Reporting Period, NML also conducted human rights assessments at Nissan North America (NNA) in collaboration with BSR as part of human rights due diligence in accordance with the Nissan Human Rights Policy Statement and the Nissan Global Guideline on Human Rights. The assessment did not suggest any inconsistencies with local laws. The assessment identified potential areas NNA could consider revising to better reflect the seven themes outlined in the Guideline. NML will consider and implement mitigation measures for each of those that are recognised as being an actual risk.



## Section 5

# How we assess the effectiveness of actions taken

Nissan continues to concentrate on improving and enhancing our modern slavery controls framework. At this early stage, we are unable to adequately assess the effectiveness of the controls we have implemented and strengthened. However, Nissan intends to design and develop a framework to ensure that we can review the effectiveness of the controls we have implemented. As part of this framework, we have established during this Reporting Period a cross-functional group across Procurement and Legal for NMA, NCAP and NFSA. The group will meet regularly to monitor the responses to our modern slavery controls and consider proposed key performance indicators to be able to measure the effectiveness of our modern slavery framework and changes required going forward.

Nissan is committed to ensuring it implements appropriate processes for investigating, assessing and handling modern slavery risks in its business and supply chains.

## Section 6

# Consultation Process

The corporate structure for NMA, NCAP and NFSA is set out above. Nissan takes a group approach to addressing modern slavery risks. In order to prepare this single joint statement, we engaged with each of NMA, NFSA and NCAP and communicated with relevant entities in our operations.

This Statement, and Nissan's modern slavery control framework, are the collaborative effort of a cross-functional team, including representatives from Procurement, Legal, Human Resources, and Compliance, in consultation with senior management across NMA, NFSA and NCAP.

The Nissan Australia group of companies, and our affiliated overseas companies, have a shared commitment to continuous improvement in the management of modern slavery risks in our operations and supply chains.

This Statement was approved by the Board of Directors for the NMA Group and NCAP on 29/09/2022.

A handwritten signature in black ink, appearing to read "Adam Paterson".

Adam Paterson  
**Managing Director NMA**

A handwritten signature in black ink, appearing to read "Peter Jones".

Peter Jones  
**Managing Director NFSA and NCAP**





**NISSAN AUSTRALIA**

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