



# Expectations of Suppliers

At Custom Fleet, our suppliers play a critical role in enabling us to deliver on our purpose of moving the world through intelligent mobility solutions.

We rely on trusted supplier partnerships to provide safe, reliable, sustainable, and compliant services to our customers.

Custom Fleet is part of the Element Fleet Management group of companies, and as such aligns its governance, ethics, and compliance framework with Element's global corporate policies. Certain policies referenced in this Guide reflect the broader group standards that apply across the Element organisation and inform Custom Fleet's supplier expectations.

This document outlines the core compliance, ethical, governance and risk management expectations that apply to suppliers of Custom Fleet and is intended to promote transparency, understanding, and partnership.

## Overview of Supplier Obligations

All suppliers must:

- Comply with applicable laws and regulatory requirements
- Operate ethically and with integrity
- Protect human rights and prevent modern slavery
- Safeguard data and information
- Maintain operational resilience
- Promptly report incidents that may impact Custom Fleet
- Cascade relevant requirements to subcontractors
- Provide accurate attestations when requested





## Ethical Conduct & Corporate Governance

Suppliers must operate with integrity and maintain governance practices consistent with Custom Fleet and Element corporate standards.

### 1. Anti-bribery and anti-corruption

Suppliers must not offer, give, solicit, or accept bribes or improper advantages in connection with business activities. This includes facilitation payments, kickbacks, improper gifts, or benefits intended to influence decision-making. Controls should exist to prevent and detect bribery risks, particularly in higher-risk jurisdictions or industries.

### 2. Conflicts of interest management

Suppliers must identify and appropriately manage situations where personal interests could improperly influence business decisions. This includes financial interests, family relationships, or other affiliations that could create perceived or actual conflicts in dealings with Custom Fleet.

### 3. Whistleblower protections

Suppliers should maintain a mechanism for employees and stakeholders to raise concerns about misconduct safely and without fear of retaliation. This promotes early identification of risk and supports ethical culture.

### 4. Ethical decision-making

Business decisions should be guided by integrity, transparency, and accountability. Suppliers are expected to maintain internal governance processes proportionate to their size and risk exposure.

### 5. Compliance with sanctions and trade controls

Suppliers must comply with applicable economic sanctions, export controls, and trade restrictions, ensuring they do not transact with sanctioned entities or individuals.



## Modern Slavery & Human Rights

Custom Fleet expects suppliers to uphold internationally recognised human rights standards and comply with modern slavery legislation.

### 1. No forced, bonded, or involuntary labour

Workers must not be subjected to coercion, debt bondage, trafficking, or forced labour practices. Employment must be freely chosen.

### 2. No child labour

Suppliers must not employ children in violation of applicable labour laws or international standards. Age verification procedures should be in place.

### 3. No deceptive recruitment practices

Recruitment must be transparent. Workers must not be charged recruitment fees or misled about employment conditions.

### 4. No retention of identity documents

Workers must retain control of their passports and identity documents and must not be required to surrender them as a condition of employment.

### 5. Fair wages and lawful benefits

Employees must receive wages and benefits consistent with applicable laws, including overtime, leave entitlements, and statutory contributions.

### 6. Voluntary overtime

Overtime must be voluntary and compensated in accordance with local legal requirements.

### 7. Safe and clean working conditions

Suppliers must provide a safe working environment that minimises risk of injury and complies with health and safety laws.

### 8. Grievance mechanisms

Workers must have access to clear, fair processes to raise concerns, and grievances must be investigated and addressed in good faith.

### 9. Supply chain flow-down

Suppliers must take reasonable steps to ensure their own suppliers and subcontractors comply with modern slavery requirements.



## Privacy, Data Protection & Information Security

Suppliers who access Custom Fleet systems or data must maintain robust information security and privacy practices.

### 1. Protection of personal information

Suppliers must safeguard personal information against unauthorised access, disclosure, alteration, or loss, consistent with privacy laws.

### 2. Protection of confidential information

Confidential business information must be protected through appropriate technical and organisational controls.

### 3. System integrity and availability

Suppliers should maintain controls that protect against system compromise, downtime, or data corruption.

### 4. Compliance with privacy legislation

Suppliers must comply with applicable privacy regulations, including obligations related to breach notification and data subject rights.

### 5. Cybersecurity risk management

Suppliers are expected to maintain appropriate cybersecurity controls such as access management, encryption, monitoring, and staff awareness training.

## Subcontractor & Supply Chain Management

Suppliers remain responsible for subcontractors and third parties used in delivering services.

### 1. Flow-down of compliance obligations

Suppliers must ensure subcontractors are contractually bound to comply with relevant ethical, modern slavery, data protection, and incident reporting obligations.

### 2. Oversight and monitoring

Suppliers should exercise reasonable oversight proportionate to the risk posed by subcontractors, including a right to audit their processes or practices.

### 3. Cooperation with inquiries

Suppliers must assist Custom Fleet in responding to regulatory, legal, or compliance inquiries involving subcontractors.



## Incident Reporting & Operational Resilience

Suppliers must proactively manage and report incidents that may impact Custom Fleet's operations, customers, or regulatory obligations.

### 1. Cybersecurity events

Incidents such as ransomware, malware, or unauthorised system access must be detected and reported promptly to limit impact.

### 2. Data or privacy breaches

Unauthorised access, disclosure, or loss of personal or confidential information must be escalated within defined notification timeframes.

### 3. Operational disruptions

Events that materially affect service delivery, availability, or performance commitments must be reported as soon as reasonably possible.

### 4. Regulatory or compliance events

Suppliers must notify Custom Fleet of regulatory investigations, breaches, or compliance failures that may impact contractual obligations.

### 5. Business continuity and disaster recovery

Suppliers must maintain and periodically test BCP and DR arrangements to ensure continuity of critical services.

## Environmental & Sustainability Expectations

Suppliers are expected to manage environmental risks responsibly and operate in compliance with environmental regulations.

### 1. Legal compliance

Suppliers must comply with environmental laws relevant to their operations.

### 2. Resource management

Suppliers should manage energy, water, and waste responsibly.

### 3. Environmental risk management

Suppliers should identify and manage environmental risks associated with their operations.

### 4. ESG transparency

Suppliers may be asked to provide information to support ESG or sustainability reporting.



## Supplier Commitment

When you sign or digitally acknowledge this document, you are confirming that:

1. You have reviewed this document and referenced policies.
2. Your organisation complies with applicable laws and standards.
3. You have controls in place to meet these expectations.
4. Where you are unable to meet any expectation, in whole or in part, you must promptly notify Custom Fleet in writing, provide full details of the gap, and, where required, cooperate in good faith to agree and implement appropriate mitigation or remediation actions within a reasonable timeframe.
5. You will notify Custom Fleet of material breaches or incidents.



## Speak with us

Suppliers are encouraged to speak with their Relationship Manager, or Supply Chain Compliance team: [supplychaincompliance@customfleet.com.au](mailto:supplychaincompliance@customfleet.com.au)

## References

See below for further information on our policies and supporting documents:

- [Element Fleet Management Anti-Corruption Policy](#)
- [Element Fleet Management Code of Conduct & Ethics](#)
- [Element Fleet Management Global Concern Reporting Policy](#)
- [Element Fleet Management Vendor Code of Conduct](#)
- [Element Fleet Management Whistleblowing Policy](#)
- [Element Fleet Management Sustainability Report](#)

### Element EthicsPoint

Element and its subsidiaries (including Custom Fleet) are committed to an environment where open and honest communication is the expectation, not the exception.

Suppliers can raise concerns via our confidential [ethics reporting website](#) at any time.