



# Supplier Guidance & Resources

This document provides practical guidance and trusted reference links to support our supplier network in meeting Custom Fleet's compliance requirements. This resource is intended to provide clarity on Custom Fleet's compliance expectations and prioritise meaningful remediation actions where gaps are identified.

Custom Fleet expects our supplier network can evidence a clear, structured plan to implement and continuously improve basic governance measures. We recognise that our suppliers operate at different scale and organisational maturity, and our expectations are aligned accordingly, with an emphasis on transparency, progress and demonstrable commitment.





## Modern Slavery

### Context and Purpose:

Worker exploitation, forced labour and modern slavery inflict severe and enduring harm on individuals, families and communities. These practices can be deeply embedded at multiple tiers of the supply chain, often remaining hidden from immediate view. Modern slavery risks may exist even where they are not directly visible or readily identifiable by businesses.

The [Modern Slavery Act 2018](#) requires certain organisations to identify, assess and address modern slavery risks and report on actions taken to mitigate their likelihood. In alignment with these obligations, our supplier agreements include an express clause requiring suppliers to comply with all applicable modern slavery legislation and to take reasonable steps to prevent, detect and address modern slavery practices within their own operations and supply chains.

***"In performing this Agreement, you must comply with Modern Slavery Laws, but as a minimum (regardless of jurisdiction) must take reasonable steps to identify, assess and address risks of Modern Slavery in your operations and supply chains[...]"***

### Custom Fleet Expectation of our Suppliers:

- Your organisation understands where modern slavery risks could arise in your operations and supply chain.
- Your organisation can effectively manage those risks through reasonable governance and operational measures. For example, documented policies or codes of conduct are in place, and you have established controls in your organisation and supply chain.
- Your organisation actively seeks to improve transparency, oversight and practices supporting modern slavery risks.

### Enhancing Practice – Guidance for Suppliers:

Depending on your organisation's scale, sector and risk profile, Custom Fleet may identify other opportunities for your organisation to further strengthen Modern Slavery governance and risk management practices. This could include:

- Nominating a responsible owner for Modern Slavery risk (e.g., Legal, Procurement, Risk or Compliance) and
- Documenting or formalising how your organisation governs modern slavery risks governance.
- Risk screening of key suppliers and high-risk categories (country, sector, labour model).
- Introducing an employee or supplier code of conduct or adding modern slavery clauses to supplier contracts.
- Providing key staff (e.g. Procurement, Supply Chain, purchasing teams or Human Resources) with modern slavery awareness training.
- Establishing a process to ensure staff, suppliers and customers can raise issues, complaints or concerns to your organisation



## Resources:

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

Resource	What it provides	How to use it
<a href="#">Sustainability at Custom Fleet</a>	Custom Fleet's expectations, key risk areas and approach to managing modern slavery in operations and supply chains.	Review the risk categories and commitments; align your own policies/controls; use it to understand what Custom Fleet expects from suppliers.
<a href="#">Modern Slavery Act 2018 (Cth) – Attorney-General's Department</a>	Official overview of Australia's Modern Slavery Act and reporting requirements.	Confirm whether the reporting threshold applies to your organisation; review definitions and examples of modern slavery risks; understand what "reasonable steps" can look like.
<a href="#">Modern Slavery Statements Register – Australian Government</a>	Searchable register of modern slavery statements and guidance materials for reporting entities.	Use examples from your industry to benchmark your statement and risk disclosures; access the Register's resources and guidance PDFs.
<a href="#">For business – Modern Slavery in Australia</a>	Curated resources to strengthen business responses to modern slavery (including grievance mechanisms).	Identify practical actions suited to your size and risk profile; use tools to strengthen supplier engagement and remediation pathways.
<a href="#">Good Practice Toolkit: Strengthening Modern Slavery Responses</a>	Step-by-step guidance on strengthening responses under the Act and conducting human rights due diligence.	Gap-assess your framework; implement supplier due diligence and escalation; develop training, governance and reporting improvements.
<a href="#">Anti-Slavery Australia – free course (UTS Open)</a>	Free online awareness training explaining what modern slavery is, risk indicators and what to do.	Use for staff awareness (especially procurement, operations and HR); reference in questionnaire responses about training and capability.
<a href="#">Anti-Slavery Australia – What we do (training &amp; advisory)</a>	Overview of Anti-Slavery Australia services, including training and capacity-building support.	If you need tailored support, consider formal training or advisory services to uplift governance and response capability.



## Privacy & Data Protection

### Context and Purpose:

Suppliers who handle personal or sensitive information must protect it appropriately. Good privacy governance reduces legal risk, protects customers and strengthens trust. Suppliers must comply with the [Privacy Act 1988](#), including the Australian Privacy Principles (APPs), where applicable. This includes taking reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure, and ensuring personal information is collected, used and disclosed in accordance with the Act.

### Custom Fleet Expectation of our Suppliers:

- Your organisation has documented privacy and data policies and procedures (appropriate to your size and risk).
- Your organisation understands its obligations under the Privacy Act 1988 and the Australian Privacy Principles (APPs).
- Your staff are adequately trained to meet privacy procedures and protect information systems and data.

### Enhancing Practice – Guidance for Suppliers:

Depending on your organisation's scale, sector and risk profile, Custom Fleet may identify other opportunities for your organisation to further strengthen Privacy governance and risk management practices. This could include:

- Implement core security controls (access control, multi-factor authentication where possible, backups, patching, encryption where appropriate).
- Deliver privacy awareness training to staff who handle personal information.
- Create and test a data breach response plan (roles, triage, notification, lessons learned).



## Resources:

Resource	What it provides	How to use it
<a href="#">Privacy in Practice (eLearning) – OAIC</a>	Step-by-step training on good privacy management practices and Privacy Act concepts.	Assign to staff who handle personal information; use as evidence of basic privacy training and awareness.
<a href="#">Privacy guidance for organisations and government agencies – OAIC</a>	Official overview of Australia's Modern Slavery Act and reporting requirements.	Confirm whether the reporting threshold applies to your organisation; review definitions and examples of modern slavery risks; understand what "reasonable steps" can look like.
<a href="#">Australian Privacy Principles (APPs) – OAIC</a>	Plain-English overview of the 13 APPs and what they require.	Use as your baseline checklist for collection, use/disclosure, security, access and correction.
<a href="#">Data breach preparation and response – OAIC</a>	Practical guidance for preparing a data breach response plan and managing incidents.	Develop or refine your breach response plan; train key staff on the four-step response approach and reporting obligations.
<a href="#">Notifiable Data Breaches (NDB) scheme – OAIC</a>	When and how to notify the OAIC and affected individuals under the NDB scheme.	Use to confirm reporting triggers and required notifications; incorporate into incident response playbooks.
<a href="#">APS Foundations: Privacy Awareness – Australian Public Service Academy</a>	Free, structured privacy awareness training module (self-directed).	Use as supplementary training for staff; reference completion in capability / training responses.
<a href="#">Research and training resources – OAIC</a>	OAIC's hub for training resources, webinars, videos and research publications.	Use templates, learning content and research insights to improve documentation, policies and ongoing training.
<a href="#">Privacy Act 1988 (Cth) – Federal Register of Legislation</a>	Authoritative legislation text for the Privacy Act.	Use as the primary reference for legal requirements; confirm whether your organisation is an APP entity and relevant exemptions.



## Conduct, Conflict of Interest, Anti Bribery & Corruption

### Context and Purpose:

Organisations are expected to effectively manage conduct related risks including bribery, corruption and conflicts of interest to demonstrate compliance under Australian law, including the [Corporations Act 2001](#) and the [Criminal Code Act 1995](#) (bribery and corruption offences). Failure to maintain effective governance and risk management frameworks can result in civil and criminal penalties, regulatory action, and significant reputational damage.

### Custom Fleet Expectation of our Suppliers:

- Your organisation sets appropriate standards for employee and supplier conduct
- Your organisation has appropriate standards and controls to manage conduct risks relating to employees and suppliers (including bribery and corruption)
- Your organisation can identify and manage potential, perceived or actual conflicts of interest.

### Enhancing Practice – Guidance for Suppliers:

Depending on your organisation's scale, sector and risk profile, Custom Fleet may identify other opportunities for your organisation to further strengthen Conduct related governance and risk management practices. This could include:

- Adopt a basic anti-bribery & corruption policy (including gifts/hospitality, conflicts of interest, reporting frameworks).
- Implement simple controls: approvals, segregation of duties, third-party due diligence for higher-risk engagements.
- Provide staff training and a confidential reporting channel.
- Formalise how your organisation responds to conduct related concerns).



## Resources:

Resource	What it provides	How to use it
<a href="#">Protect yourself from bribery and corruption   Laws and regulations</a>	Up-to-date overview of Australian bribery and corruption laws, enforcement and key compliance themes.	Use to understand the legal landscape and common control expectations; benchmark your policy and controls.
<a href="#">Foreign bribery – Attorney-General's Department</a>	Official information on Australia's foreign bribery regime and reforms (including corporate obligations).	Use to understand key compliance obligations and reforms; ensure your anti-bribery policy covers foreign bribery risk and escalation.
<a href="#">Foreign bribery offences and penalties – Attorney-General's Department</a>	Explanation of offences and penalties for bribing a foreign public official.	Use to brief leadership and relevant staff on consequences and risk; support training materials and policy rationale.
<a href="#">Foreign bribery fact sheet (PDF) – Australian Federal Police</a>	Plain-language fact sheet describing the foreign bribery offence and practical examples.	Use for staff awareness; incorporate into induction or annual compliance training and questionnaire evidence.
<a href="#">Research and guides – National Anti-Corruption Commission (NACC)</a>	Practical guidance for recognising and managing corruption risks (including conflicts of interest).	Use to strengthen conflicts of interest processes, reporting pathways and integrity culture.



## Organisational Resilience

### Context and Purpose:

Organisational resilience enables businesses to anticipate, withstand and respond effectively to operational, financial, technological and external disruptions. In an increasingly complex and interconnected environment, disruptions may arise from cyber incidents, supply chain interruptions, regulatory change, natural disasters or geopolitical events. These risks are not always predictable or immediately visible, yet they can significantly impact service continuity, financial stability and stakeholder trust. A resilient organisation maintains appropriate governance, risk management and business continuity arrangements to minimise disruption and recover in a timely and controlled manner. In alignment with our broader risk management framework, we expect suppliers to implement proportionate measures that support continuity of critical services and strengthen the resilience of their operations and supply chains.

### Custom Fleet Expectation of our Suppliers:

- Your organisation understands the key operational, technological and third-party risks that could materially disrupt your operations and service to Custom Fleet.
- Your organisation maintains proportionate business continuity and incident response arrangements to manage and recover from disruptions.
- You notify Custom Fleet in a timely manner of any material incidents that may impact services or contractual requirements to Custom Fleet.

### Enhancing Practice – Guidance for Suppliers:

Depending on your organisation's scale, complexity and risk profile, Custom Fleet may identify the following opportunities to further strengthen resilience and governance practices:

- Document and periodically test a Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP).
- Conduct scenario tests or exercises to assess your readiness for high-impact events (e.g. cyber incident, system outage, key supplier failure).
- Identify critical services, systems and third-party dependencies, and implement contingency arrangements where appropriate.
- Provide basic resilience and incident response awareness training to relevant staff.
- Periodically review insurance coverage and financial risk mitigation measures to support your organisation's recovery capability.



## Resources:

Resource	What it provides	How to use it
<a href="#">Organisational Resilience: Good Practice Guide (PDF) – CISC</a>	Practical guidance to uplift organisational resilience maturity (all-hazards approach).	Use as a maturity checklist for governance and resilience; prioritise improvements, owners and review cadence.
<a href="#">Develop an emergency management plan (BCP template) – business.gov.au</a>	Government template and guidance for an emergency management plan (including business continuity).	Create or improve your business continuity plan; document roles, critical functions, contacts and recovery steps.
<a href="#">Essential Eight maturity model – Australian Cyber Security Centre</a>	Baseline cyber security maturity model widely used across Australian organisations.	Use to baseline your cyber controls; evidence a structured approach to patching, MFA, backups and incident resilience.
<a href="#">Australian Resilience Centre – Building Resilient Futures</a>	Practical tools, workshops and resources to build resilience capability.	Use publications and tools to support risk management, stakeholder engagement and continuous improvement.
<a href="#">ASX Corporate Governance Principles &amp; Recommendations (4th edition PDF)</a>	Widely adopted corporate governance principles covering culture, risk management, integrity and reporting.	Use as a governance benchmark (even if you are not listed); map policies, roles and oversight to relevant principles.



## Sustainability & Environmental Management

### Context and Purpose:

Sustainability obligations are increasingly embedded in Australian law and supply chain expectations. Organisations must comply with environmental protection requirements under the [Environment Protection and Biodiversity Conservation Act 1999](#) and relevant State environmental legislation. Environmental claims must not be misleading under Australian Consumer Law (Schedule 2 of the [Competition and Consumer Act 2010](#)). Failure to appropriately manage environmental impacts or substantiate sustainability claims can result in regulatory penalties, enforcement action, contractual risk, and reputational damage.

### Custom Fleet Expectation of our Suppliers:

- Where required, your organisation meets all environmental protection laws
- Your organisation understands and controls key environmental impacts relevant to your operations (e.g., energy, fuel, emissions, waste, water and materials).
- Your organisation understands and manages material value-chain (Scope 3) impacts where relevant, including engaging suppliers and contractors.
- Your organisation only makes accurate and verifiable sustainability claims (and avoids "greenwashing").
- Your organisation establishes and monitors practical environmental or sustainability improvement actions (e.g., reducing electricity use, improving fleet efficiency, reducing waste, engaging key suppliers).

### Key Recommendations for Improvement:

- Your organisation has documented commitments and controls (e.g., an environment/sustainability policy, targets, action plans or an environmental management system).
- Your organisation can provide evidence of emissions calculations and reduction initiatives (e.g., energy efficiency, renewable electricity, fleet/transport changes, waste reduction).
- Your organisation has an accountable owner for sustainability/environmental risks.
- Your organisation can identify material impacts and collect baseline data (electricity, fuel, travel/transport, waste volumes and key purchased items where relevant).
- Your organisation can estimate a basic greenhouse gas inventory (start with Scope 1 and Scope 2), using recognised methods (e.g., the GHG Protocol) and Australian emission factors (NGA Factors).



## Resources:

Resource	What it provides	How to use it
<a href="#">National Greenhouse and Energy Reporting (NGER) Scheme – Clean Energy Regulator</a>	Australia's national framework for reporting greenhouse gas emissions, energy production and energy consumption; explains thresholds and obligations.	Check whether you meet reporting thresholds; use NGER definitions to structure data collection; align your emissions/energy reporting approach where helpful.
<a href="#">National Greenhouse Accounts (NGA) Factors – DCCEEW</a>	Official Australian emission factors and methods for estimating emissions (updated annually).	Use the latest factors to calculate Scope 1 and Scope 2 emissions (and some Scope 3 categories); record which edition you used and keep supporting evidence.
<a href="#">Science Based Targets initiative (SBTi) – Corporate Net-Zero Standard</a>	Framework for setting science-based emissions reduction and net-zero targets aligned to climate science.	Use to benchmark target ambition and transition planning; support supplier engagement expectations; provides additional credibility if you seek target validation.
<a href="#">Australian Sustainability Reporting Standards – AASB</a>	Australian standards supporting sustainability and climate-related financial disclosures (including mandatory AASB S2 for in-scope entities).	Understand disclosure expectations and terminology; align your climate risk and emissions reporting if requested by customers; confirm whether mandatory reporting applies to your organisation.
<a href="#">Climate Active Carbon Neutral Standard for Organisations</a>	Australian Government-backed voluntary standard for measuring, reducing, offsetting and reporting emissions to support credible carbon neutral claims and certification.	Use if pursuing carbon neutral claims/certification; prioritise emissions reductions and document actions; understand evidence and reporting requirements.
<a href="#">National Waste Policy Action Plan (2024) – DCCEEW</a>	National priorities and actions to transition to a safe circular economy and improve waste outcomes.	Benchmark your waste and circular-economy initiatives; identify practical actions (avoid, reuse, recycle); strengthen responses about waste governance and reporting.
<a href="#">Sustainable Packaging Guidelines – APCO</a>	Guidance to design and manage packaging to reduce environmental impacts and support recycling and recovery.	Use if you supply products with packaging; improve packaging design and labelling; support responses about packaging stewardship and circularity.



## Need help?

We recognise that suppliers operate across varying levels of scale, complexity and risk maturity. If you require clarification on our expectations or would like guidance on strengthening your governance, risk management or compliance practices, we encourage you to engage with your Custom Fleet representative. We are committed to working collaboratively with our suppliers to support practical, proportionate improvements and to promote responsible, resilient and sustainable supply chain practices. For tailored advice, consider seeking legal counsel or specialist compliance support.



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