

MODERN SLAVERY STATEMENT



Modern Slavery Statement

Introduction

This statement is Infomedia's Modern Slavery Statement (**Statement**) and covers the period 1 July 2022 to 30 June 2023 (**Reporting Period**).

This Statement applies to Infomedia Ltd and its controlled entities and has been produced in accordance with Australia's *Modern Slavery Act 2018* (Cth) (the **Act**) and Infomedia's Modern Slavery Policy. This Statement outlines the steps Infomedia has taken, and intends to take in the future, to identify and address modern slavery risk in its supply chain and business operations.

About Infomedia

Infomedia's global leading ecosystem of 'Software as a Service' (SaaS) and Data as a Service (DaaS) solutions empowers automakers and their dealer networks to manage the vehicle and customer lifecycle. Infomedia's data-driven solutions are used by over 250,000 industry professionals, across 50 automaker brands and in 186 countries to create a convenient customer journey, drive dealer efficiencies and grow sales. Infomedia has led innovation in retail automotive technology for more than 30 years and continues to expand its reach within the three regions in which it operates. For more information, please visit Infomedia's website https://www.infomedia.com.au and YouTube channel https://www.infomedia.com.au and YouTube https://www.infomedia.com.

Infomedia's structure, operations and supply chains

The Infomedia Group is headquartered in Sydney Australia and operates offices in Melbourne, Cologne, Cambridge, and Atlanta. The Group is comprised of Infomedia Ltd and wholly owned subsidiaries including IFM Americas Inc. SimplePart LLC, IFM Europe Ltd and IFM Deutschland. The Group employs approximately 370 people globally across these offices with approximately 60% of the workforce situated within Australia with the balance located in the United Kingdom, the United States of America and Germany. Infomedia Ltd has consulted with its controlled entities in preparing this statement to harmonise the approach adopted by Infomedia Ltd towards modern slavery risks.

Infomedia's guiding values and objectives

Our core business objective is to make our customers successful. We empower our automotive partners by providing highly available, effective and innovative SaaS tools and information solutions which advance their productivity, efficiency and profitability whilst simultaneously enhancing the service experience of their customers. By creating success for our customers, we create success for Infomedia, its people and its investors.

The Company lives to the following core values in delivering its services to clients:

- Accelerating Performance We are accountable to our stakeholders and action orientated.
- **Driving Innovation & Service** We aim to be cutting edge, always first and continuously seeking to evolve. Our technology leadership empowers our customers.
- Navigating Global, Steering Local We are 'One Infomedia' and we all share the same vision. We have a unified customer approach with local execution. Customer centricity is the key to our success.

Infomedia's position on Modern Slavery

Infomedia is committed to creating an operating environment which is safe, ethical and which promotes trust between the Company and its workforce. Infomedia has a zero-tolerance policy to modern slavery practices within its direct operations and strives to take all reasonable steps to ensure modern slavery risks are minimised in its broader supply chain.

Addressing Modern Slavery Risk

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Infomedia addresses the risk of modern slavery by adoption of the following measures:

Policies

Infomedia strives to maintain high ethical standards in how we conduct our business globally. Our Code of Conduct (**Code**) outlines the standard of conduct expected of all directors, officers, employees and contractors of the Infomedia Group, and provides guidance to ensure that proper ethical and legal decisions are made when conducting business for us and performing day-to-day duties. The code aligns with the Core Values and includes reporting procedures and accountability provisions.

The Code of Conduct is supplemented by additional policies including our:

- **Modern Slavery Policy** which raises awareness about modern slavery, outlines the responsibilities of Infomedia personnel in recognising and dealing with modern slavery and to ensure appropriate measures are in place to prevent modern slavery; and
- Whistleblower Policy which outlines how eligible parties can make whistle-blower reports about misconduct and the protections afforded to whistle-blowers generally.

Supplier due diligence and risk assessment

Our risk management practices are aligned to ISO 31000 standards and seek to identify, assess, monitor and manage perceived business risks. Risk assessment extends to supply chain risk, including risk of modern slavery.

The Company has risk assessed its supply chain, and continues to assess and identify risk of modern slavery using the following key factors to guide the supplier assessment process:

- the geographic location of the supplier;
- the industry sector in which the supplier operates;
- the goods or services to be supplied; and
- the market reputation of the supplier and/or the depth of our relationship with the supplier.

Infomedia has a procurement function in Australia. Given the nature of our business, our supply chain mostly consists of the hiring of service providers and the procurement of software-related goods and services. We aim to source goods and services from reputable suppliers and the nature of the goods and services do not generally require the types of labour at risk of modern slavery.

Accordingly, we consider that our supply chain risk is relatively low. However, we do recognise that we must continue to monitor and assess our supply chain and partner networks, particularly in the in



relation to offshore professional services utilised by the Company. Whilst our core teams are employed directly in our key markets with strong worker protections, the Company also engages with third parties including parties located in the Philippines, Indonesia and India for the supply of outsourced professional corporate services and software development services. Whilst these countries have a higher relative prevalence of vulnerable workers¹, the professional and education requirements of our offshore partners ensures a lower risk profile generally. Notwithstanding, the Company has taken additional steps to develop strong relationships with its key vendors in these regions and, in some instances, has employed additional layers of verification, including the use of onsite visits to assess working conditions and standards firsthand. During the Reporting Period, Company undertook a review of potential offshore suppliers in India. To ensure the supplier Company selected was compliant with our supplier assessment criteria including modern slavery protections, Company executives travelled to prospective supplier locations to review the facilities and working conditions directly.

Education

The Company has run online compliance programs for employees globally, including but not limited to, training about modern slavery, how to identify it and what to do about suspected instances within the Company's supply chain.

Assessing our measures

Infomedia will continue to review the policies and processes in place to assess the ongoing effectiveness in identifying and addressing modern slavery risks within business operations and the supply chain. This will include:

- continued training and raise awareness within our operations about modern slavery identification and reporting;
- ongoing improvements to vendor assessment and on-boarding procedures;
- where practicable, ongoing engagement with higher-risk suppliers to ensure they are implementing mitigation strategies to minimise the risk of modern slavery in their supply chains.

Consultation and approval

This statement has been prepared in consultation with the directors of the Group entities and is made in accordance with the Act for the Reporting Period ending 30 June 2023.

This Statement was approved by the Board of Directors of Infomedia Ltd on 27 November 2023.

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Jens Monsees CEO and Managing Director of Infomedia Ltd 18 December 2023

¹ Walk Free Foundation (2018) Global Slavery Index, available from <u>www.globalslaveryindex.org</u>