



Statement

CAPRICORN

Capricorn Society Ltd

2025

Modern Slavery
Statement

Chair Statement

At Capricorn, our purpose is to improve the lives of our Members by supporting them in building stronger businesses. As one of Australia's largest Member-owned organisations, we view being a good corporate citizen as an ongoing commitment that influences the way we operate, something we are continually evolving.

Within our annual ESG report, our Areas of Focus, Ethical Supply Chains and Integrity and Accountability, highlight our commitment to respecting human rights and ensuring responsible business practices. By collaborating closely with organisations that share our values, we strive to operate our business with integrity and responsibility, continuously looking for new ways to drive positive change.

This Modern Slavery Statement builds on our ongoing commitment to ethical business practices by sharing the progress we have made this year, addressing modern slavery risks across our operations and supply chain. It highlights steps we have taken and serves as a reflection of our continual efforts to identify, reduce, and prevent modern slavery.



Mark Rowe
Chair, Board of Directors
Capricorn Society Limited

About Us

In 2024, Capricorn proudly celebrated 50 years of providing support to our Community, a major milestone for a cooperative that began in 1974 with just 17 service station owners in Western Australia.

Capricorn is one of Australia and New Zealand's largest and most dynamic Member-owned organisations. Since 1974, we've provided our Members with financial and business solutions to make

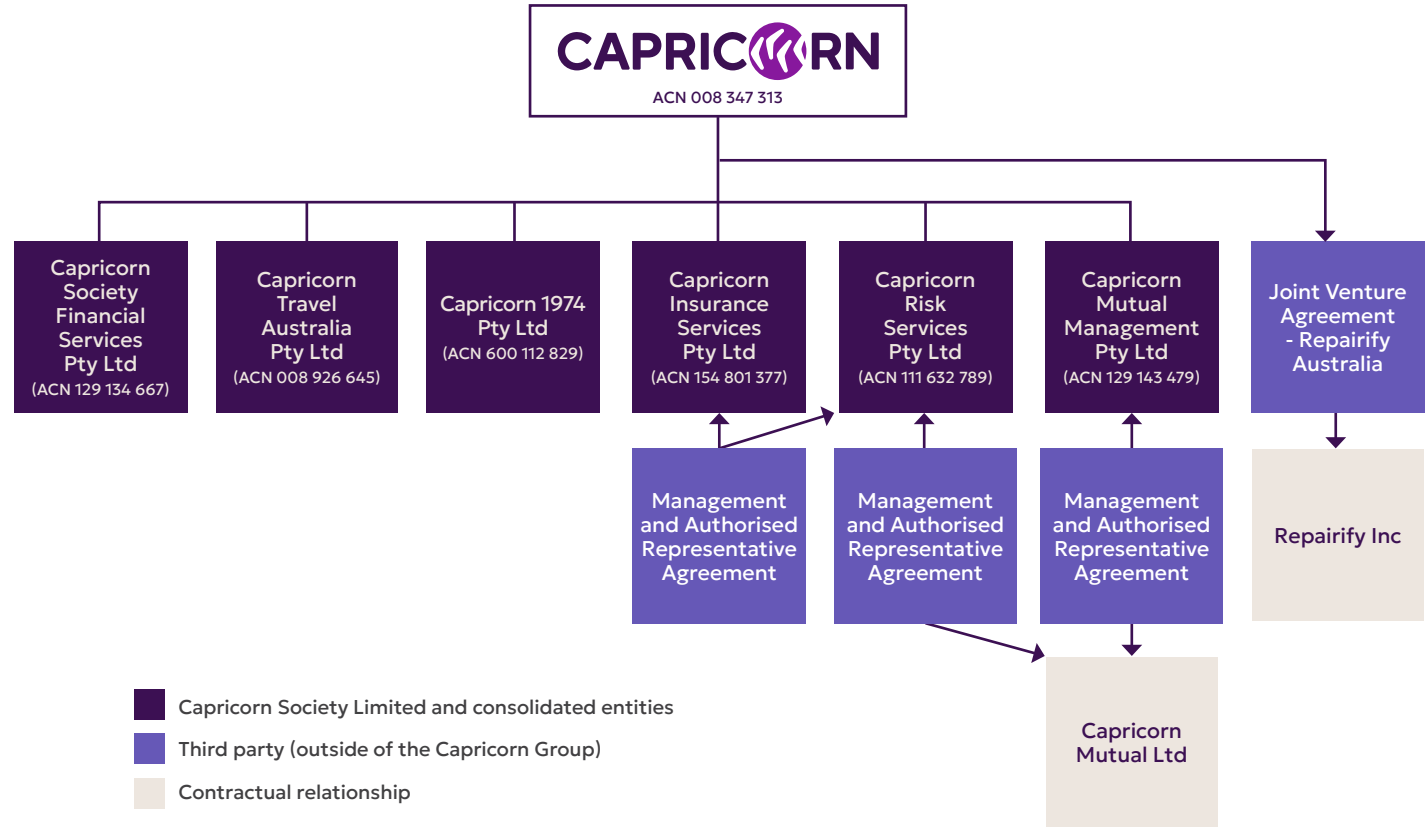
running a business easier. Our flagship Trade Account offers instant credit with over 1,600 Preferred Suppliers, simplified monthly expenses, and a generous rewards program. We have a strong foundation in the automotive and machinery aftermarkets. Our vibrant community includes over 31,000 Members across Australia and New Zealand, from national franchises to local family workshops.

Our Business

Mandatory Reporting Criteria 1 & 2

Reporting Entity and Structure

Capricorn Society (hereafter referred to as ‘Capricorn, ‘the Group’, ‘we’, ‘our’ or ‘us’) consists of Capricorn Society Limited (ACN 008 347 313) and our wholly owned and controlled subsidiaries. Capricorn is a public company limited by shares, registered in Western Australia with our corporate office located in Perth.



The structure of Capricorn and its related companies

Capricorn was originally established as a co-operative under the *Western Australian Co-operative and Provident Societies Act 1903 (WA)* to support automotive repair and service businesses. In 2006, we transitioned to a public company structure; however, we continue to uphold the cooperative principles set by the International Cooperatives Alliance, maintaining our status as a corporatised distributing co-operative.

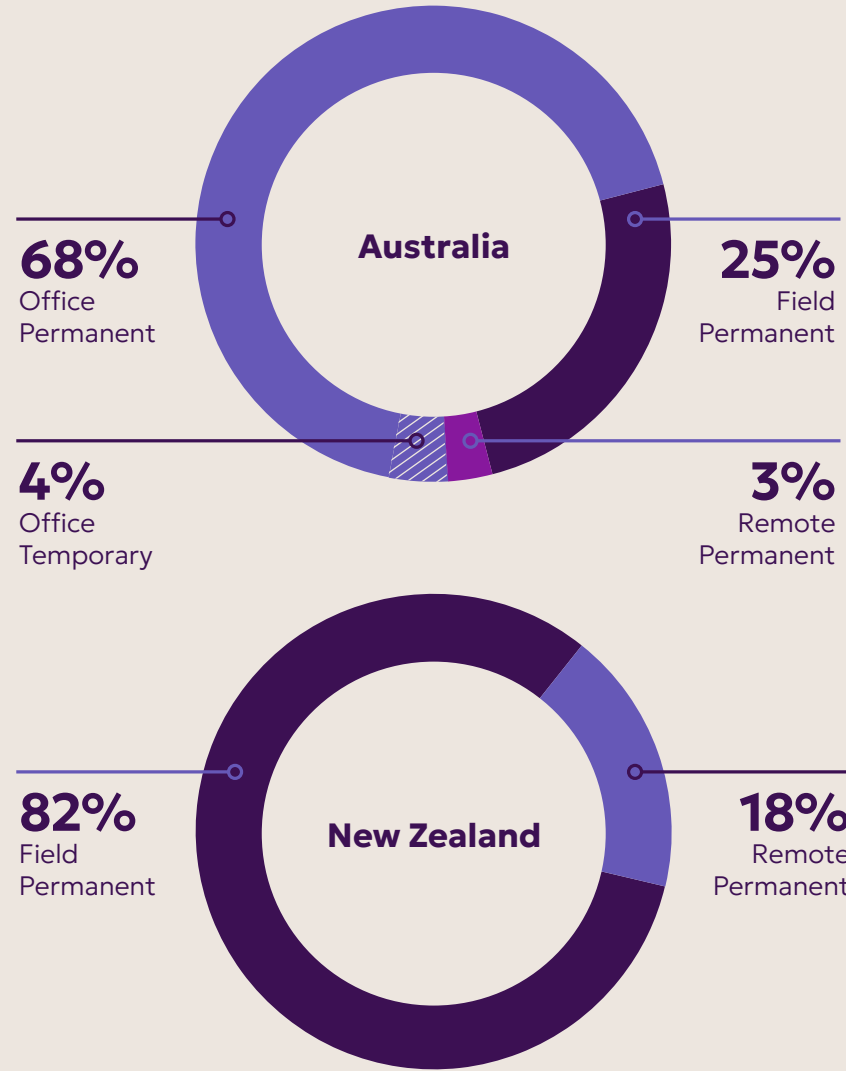
This statement describes the actions we took in the financial year ended 30 June 2025 to assess and address the risk of modern slavery in our operations and supply chains. The content was guided by the *Modern Slavery Act 2018 (Cth)* (the Act) and Guidance for Reporting Entities provided by the Commonwealth Attorney General’s Department.

Our People

As at 30 June 2025, the Group employed a total of 517 people, with 483 based in Australia and 34 in New Zealand. Most of our corporate staff are located in Perth, with the remainder situated in the Sydney office or working remotely across Australia and New Zealand.

Our mobile field team is well represented across every state and territory in Australia, as well as throughout the main regions of New Zealand. With 123 team members spread nationwide and 28 covering key locations across New Zealand's north and south Islands, we ensure our Members receive local support and service wherever they operate.

The majority of our team members hold permanent positions, with a select group engaged on a temporary basis to meet short-term operational needs. Additionally, during the period, we engaged 10 non-employee workers in Perth through an Australian labour agency to help manage occasional workforce demands. We also engaged with a third party located in Australia who provides recruitment services to facilitate the offshoring of administrative work and fill temporary vacancies in the Philippines.



Workforce Composition by Country

Our Operations

Trade Accounts

We operate nationwide across Australia and in New Zealand. Our core business activity is the provision of Accounts to Authorised Purchasers. Authorised Purchaser means a person who has an Account with us, such as Members or Preferred Suppliers. Accounts give Authorised Purchasers access to instant credit through Capricorn for purchases of goods and services from Preferred Suppliers, or from Capricorn and its related companies.

Our Members are from automotive and allied industries and are typically independent general repairers, specialist technicians and mechanics who comprise an essential part of the aftermarket repair industry. Preferred Suppliers include leading automotive suppliers through Capricorn provided Accounts.

In addition to providing Accounts, we facilitate a range of other activities either directly or through our related companies.

- (i) **Direct Finance.** Capricorn provides limited direct credit and loans to Members (limited in the sense of loan term, individual loan quantum and from an overall loan portfolio) to fund the purchase of capital equipment, associated items and vehicles through its range of CAPEzi finance products.
- (ii) **Mutual Management.** Capricorn provides management and sales services to Capricorn Mutual Limited (Capricorn Mutual) through Capricorn Mutual Management Pty Ltd and Capricorn Risk Services Pty Ltd, both wholly owned subsidiaries of Capricorn.
- (iii) **Risk Services.** Capricorn Risk Services Pty Ltd, a wholly owned subsidiary of Capricorn, provides access to both protection issued by Capricorn Mutual and general insurance products brokered through Capricorn Insurance Services Pty Ltd:
 - a. Protection. Capricorn Mutual, a subsidiary of Capricorn by reason of Capricorn's power to appoint the majority of its directors (and has been consolidated into the Capricorn annual report for financial reporting, but not tax purposes) is a public company limited by guarantee and provides risk protection products to its Members. Capricorn Mutual issues and publishes a Modern Slavery Statement that addresses modern slavery risks and actions. Its activities are not covered by this statement.
 - b. General Insurance. Capricorn Insurance Services Pty Ltd, a wholly owned subsidiary of Capricorn, brokers general insurance primarily focusing on those types of businesses and activities for which Capricorn Mutual does not.
- (iv) **Travel.** Capricorn provides travel agency services to Authorised Purchasers in Australia and the general public through its wholly owned subsidiary Capricorn Travel Australia Pty Ltd.
- (v) **Knowledge Services.** Capricorn provides Members and Authorised Purchasers access to online services:
 - a. Capricorn Service Data®. This online service provides Members and Authorised Purchasers access to the most comprehensive online service information for thousands of vehicles, supporting the service and maintenance of almost any vehicle in line with manufacturers' warranty requirements.

- b. AutoBoost®. This online service provides Members and Authorised Purchasers with a range of free and paid tools to help them better run their businesses including amongst others equipment and building maintenance reports, online and print advertising templates and an SMS system.
- c. CAPhub®. This is Capricorn’s online content hub, bringing together articles, interviews, industry analysis and more to help Members and Authorised Purchasers to better run their businesses.

(vi) Remote Technician Support. Capricorn and Repairify Australia Holdings Pty Ltd (Repairify) have entered into a joint venture agreement that delivers advanced automotive remote diagnostic services to repairers across Australia. Through its revolutionary tools and validated OEM compatible technology, services, and intelligence, Repairify helps automotive professionals run better businesses through improved diagnostics, calibrations, programming, and workflows.

Our Investment

Our operations also include the management of financial investments, both as internally managed investments in other entities and externally managed investment portfolios.



Our Supply Chain

Our supply chain is predominantly related to the operations of our offices in Perth and Sydney, as well as the maintenance of our mobile field teams. We engaged with 419 unique external corporate suppliers during this reporting period. Procurement practices have remained consistent from the previous period, including:

- 1 IT and telecommunication equipment and services
- 2 Professional services
- 3 Financial and investment services
- 4 Property operations and services
- 5 Office supplies and uniforms
- 6 Training providers
- 7 Fleet vehicles
- 8 Events, travel and entertainment
- 9 Marketing and digital products and services

Modern Slavery Risks

Mandatory Reporting Criteria 3

Capricorn has utilised the *Global Slavery Index 2023* to help identify potential modern slavery risks within our operations and supply chain. This assessment considers factors such as the geographical locations where we operate and procure goods and services, the vulnerability of those regions to modern slavery, and the effectiveness of government responses to combatting modern slavery in those areas.

Operations

Our People

Our success is driven by our people, whose dedication, expertise, and passion truly set us apart. We are committed to creating a safe, supportive, and inclusive environment where every individual feels valued.

Our direct operations pose a minimal risk of modern slavery, as all activities are based in Australia or New Zealand, low risk areas. Our workforce consists of skilled professionals employed under formal contracts and protected by workplace laws in both countries. These workplace laws are strictly enforced, ensuring fair wages, safe working conditions, and comprehensive protections against exploitative practices.

Investments

Our investment portfolio comprises of both domestic and international holdings. We understand that without appropriate selection criteria, these investments may be susceptible to modern slavery risks.

Supply Chain

Procurement Practices

We acknowledge that our supply chain spans borders and sectors that may have an increased risk of modern slavery, including procurement of clothing, products and services which may be provided by low skilled workers.

Our tier one, direct suppliers, are predominately located in Australia and New Zealand with approximately 89% and 7% of expenditure paid respectively, with smaller proportions across other jurisdictions.

The number of suppliers in each country generally aligns with the level of spend in that relevant country, which supports a proportionate approach to managing risk. Where procurement occurs in regions with higher modern slavery prevalence or vulnerability scores, such as India, we have ensured appropriate safeguards are in place through contractual commitments and regular engagement with suppliers. This ensures that our approach remains responsive to both geographic risk factors and procurement value, as identified through the *Global Slavery Index 2023*.

Capricorn maintains a contractual relationship with a supplier incorporated in India, which accounts for 3.28% of tier one procurement expenditure. India is recognised as having a heightened modern slavery risk, as indicated by the *Global Slavery Index 2023*, with a prevalence rate of 8.01 per 1,000 and a vulnerability score of 55.98%. In response, Capricorn’s contract includes modern slavery provisions, such as

warranties to comply with Australian legislation, the undertaking of precontractual and ongoing internal and supply chain governance systems to ensure ongoing compliance. Teams from this supplier are located in both India and the United States, with engagements occurring from daily to weekly via online channels like video calls and emails, supporting effective communication and oversight.

Similarly, we recognise that risks can emerge at various tiers within the supply chain, including through arrangements involving third parties. Capricorn has a contractual relationship with a third party located in Australia who provides recruitment services, facilitating the offshoring of administrative work to the Philippines. Individuals are engaged through this arrangement to perform administrative duties and fill temporary vacancies, with workforce numbers flexibly adjusted according to business needs. Daily interaction between Capricorn and the service provider is conducted frequently through online channels, such as video calls and emails, ensuring communication and oversight. This agreement also incorporates comprehensive modern slavery provisions, including warranties from the recruiter confirming compliance with relevant human rights laws and the *Modern Slavery Act 2018* (Cth).

Countries	Capricorn	Global Slavery Index 2023		
	Procurement Distribution by Spend	Estimated prevalence of modern slavery per 1,000 population	Total Vulnerability score (%)	Government response total (%)
Australia	88.49%	1.61	6.81	66.67
New Zealand	6.90%	1.61	7.82	53.85
India	3.28%	8.01	55.98	46.15
United States of America	0.72%	3.30	24.53	66.67
The Netherlands	0.33%	0.57	5.96	66.67
United Kingdom	0.14%	1.80	14.32	67.95
Finland	0.03%	1.41	5.42	60.26
Israel	0.03%	3.79	35.43	44.87
Switzerland	0.03%	0.50	13.64	50.00
Canada	0.03%	1.83	10.71	60.26
Ireland	0.02%	1.10	9.33	62.82

Members and Preferred Suppliers

We support our Members, all of whom are linked to the Australia or New Zealand automotive and allied industries. Given the nature of the activities undertaken by Members (primarily collision and motor vehicle repair and servicing), we assess the risk of Member’s engaging in modern slavery to be consistent with the broader exposure levels of Australia and New Zealand, where vulnerability is considered relatively low on a national scale.

We also acknowledge that our Preferred Suppliers may face a higher risk of modern slavery, particularly given the complex, multi-tiered structure of global supply chains.

Tier 1 Supply Chain

Modern Slavery Actions

Mandatory Reporting Criteria 4

Our approach to modern slavery is Group wide. During the reporting period we maintained existing due diligence and remediation practices as well as introduced improvements to select processes.

Operations

We equip our people with the knowledge and tools necessary to assess and address modern slavery through ongoing training, clear policies, and accessible reporting channels. This ensures our teams are empowered to recognise potential risks and take appropriate action, supporting our commitment to ethical and responsible business practices.

Governance & Oversight

The Capricorn Board of Directors has ultimate responsibility for the Group's strategy and management of risks, including risks to human rights such as those addressed by the Act. As part of the induction and onboarding process, directors, where necessary, are provided with training on Modern Slavery and Whistleblowing to ensure they are equipped to identify, assess, and respond to issues should they arise.

Policies & Procedures

To support our people and their health, safety, and wellbeing, we have the following policies, and their related procedures, in place as they relate to assessing and addressing modern slavery risks.

- **Employee Remuneration Policy**

We aim to consistently attract, retain, and fairly reward employees by applying a uniform remuneration approach across the entire Group, reducing the risk of exploitative practices and help protect employees from vulnerabilities associated with modern slavery.

- **Payroll Policy**

The Payroll Policy is designed to ensure all staff are paid accurately and promptly, in accordance with relevant legislation. Efficient payroll administration safeguards workers against wage theft and financial exploitation.

- **Work, Health, Safety & Security Policy**

We're committed to providing a healthy and safe work environment for all workers, contractors, and visitors. By maintaining health, safety, and security measures, we aim to mitigate against and prevent unsafe practices and working conditions.

- **Whistleblower Policy and Protection Scheme**

The Whistleblower Policy and scheme focus on transparency and protection, encouraging individuals to safely and securely report legitimate concerns or wrongdoing related to our operations. By protecting and supporting whistleblowers, we strengthen our ability to detect, deter, and address wrongdoing, including modern slavery risks, ensuring a culture of accountability. In 2022, we engaged an independent whistleblower service to receive and manage any disclosures made under our Whistleblower Policy. During the reporting period, our Whistleblower Policy was independently reviewed, updated to reflect best practice, and formally approved by the Board.

- **Legal Services Policy**

This policy is designed to ensure that all areas of Capricorn, and every individual within the organisation, fully comply with legal obligations. It also establishes internal governance for the procurement of goods and services from external parties, including the effective management of contracts.

Training and Awareness

To ensure our people are equipped with a comprehensive understanding of the risks, indicators, and responsibilities associated with modern slavery, we provide training to empower employees to identify and respond appropriately to potential issues.

- Modern Slavery Awareness Training forms a core component of our employment onboarding process, equipping new team members with an understanding of modern slavery risks, indicators, and reporting responsibilities. To ensure ongoing understanding, refresher training is periodically mandated. The most recent Modern Slavery refresher training was assigned during the 2024 reporting year.
- Whistleblower Training is provided to all new employees during their onboarding, ensuring they understand how to safely report concerns. Ongoing awareness is maintained through compulsory annual knowledge sessions, as well as regular updates and information shared via the intranet, internal newsletters, and displayed throughout office spaces.

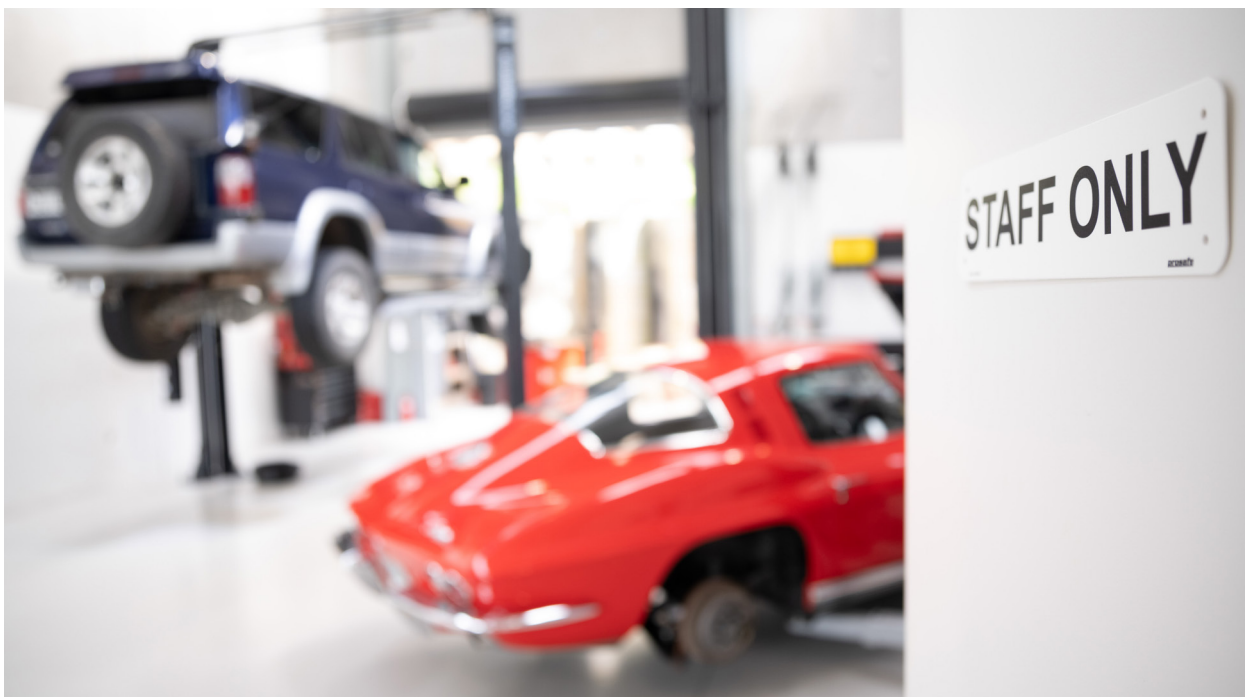
Investments

Our operations include the management of financial investments, both as internally managed investments in other entities and externally managed investment portfolios. The Capricorn Investment Committee (CIC) oversees these investments, guided by our Investment Policy that ensures environmental, social, and governance (ESG) considerations, including modern slavery, are embedded in our investment research, analysis, and selection processes.

To reinforce the integration of ESG principles, including proactive measures to address modern slavery, the CIC gives preference to fund managers in the Long-Term Pool who are signatories to the United Nations Principles

for Responsible Investment or members of the Responsible Investment Association Australia. At the end of the reporting period, 94% of fund managers within the long-term pool, where relevant, complied with these standards. Fund managers that are not signatories were approved by advisors based on alternative compensating ESG factors.

During the reporting period, our investment portfolio was held with JBWere, which, as a subsidiary of National Australia Bank, issues and publishes a Modern Slavery Statement that addresses modern slavery risks and actions.



Supply Chain

We support our supply chain partners and internal teams with the knowledge and tools necessary to meet our requirements and commitments regarding modern slavery risk.

Procurement Practices

During this reporting period, we have continued to uphold the policies and actions established in the previous year to address modern slavery risks within our procurement practices. This commitment extends to the Legal Services Policy, which governs the contracting of external party goods and services, including the management of contracts. We seek to include in supplier contracts a right to terminate dealings with suppliers that operate in a manner that puts at risk our commitment as outlined in this statement. Capricorn does, however, recognise that such action could have a detrimental impact on the employees of suppliers, which is contrary to the purposes of the Act. Capricorn's preferred approach will therefore be influencing the supplier to remediate.

Members and Preferred Suppliers

Our operations are built on strong relationships, with our field teams regularly visiting Member sites. This frequent engagement enables us to continually assess and respond to any potential modern slavery concerns that may arise.

During the reporting period, we enhanced our Area Manager Handbook for field staff teams and developed a quick reference guide to provide further support in identifying and managing modern slavery risks in their day-to-day roles. These resources provide practical examples and clear steps to follow if a suspected instance of modern slavery is encountered. If concerns arise, we retain the discretion to discontinue relationships with Members who do not uphold our standards.

Preferred Suppliers enter into ongoing trade agreements with Capricorn that reflect our commitment to upholding the Act. During the reporting period these standards were maintained with new Preferred Suppliers, ensuring that both new and continuing partnerships reinforce our standards and expectations regarding modern slavery risk. To support this, we provide Preferred

Suppliers with a comprehensive guide that outlines our expectations regarding modern slavery, fostering transparency and shared responsibility. Additionally, where applicable, we require Preferred Suppliers with an annual turnover exceeding \$100 million to submit a Modern Slavery Statement, reinforcing accountability and integrity in our supply chain.



Modern Slavery Effectiveness of Actions

Mandatory Reporting Criteria 5

Throughout the reporting period, Capricorn did not receive any notifications, nor did we identify any confirmed or suspected cases of modern slavery within our operations or supply chains.

The effectiveness of our actions to address modern slavery risks is an ongoing and evolving process. The following performance measures demonstrate the effectiveness of actions noted in this statement.

Training and Awareness

Modern Slavery Awareness

100%

Designated employees successfully completed assigned mandated training

Whistleblower Training

100%

Designated employees successfully completed assigned mandated training

Whistleblower Reports Relating to Modern Slavery

0



Modern Slavery Consultation with other Entities

Mandatory Reporting Criteria 6

The Capricorn Board delegates the execution of its strategic direction, as well as day-to-day management responsibilities, to the Group Chief Executive Officer, who leads and collaborates with the Executive Leadership Team. Throughout the preparation of this statement, the Groups Executive Leadership Team and relevant Senior Management were actively consulted, and this statement has been formally endorsed by the Capricorn Board.

We recognise that addressing modern slavery risks is a long-term process that requires strong commitment and dedication. The Group is committed to reporting annually on its progress in addressing modern slavery risks within its operations and supply chain and look forward to working with our business partners and suppliers on this global issue.

This statement for Capricorn Society Ltd and its wholly owned and controlled subsidiaries was approved by the Capricorn Society Board on 11 December 2025.

Signed,



Mark Rowe

Chair, Board of Directors
Capricorn Society Limited

CAPRICORN

Capricorn Society Limited

ABN 29 008 347 313

capricorn.coop

1800 327 437