



VERRA  
MOBILITY

# REDFLEX HOLDINGS PTY LTD

---

## Modern Slavery Statement

# MODERN SLAVERY STATEMENT

## 1. OUR STATEMENT

- (a) Redflex Holdings Pty Ltd ACN 069 306 216 (**Redflex Holdings**) and its subsidiaries including Redflex Traffic Systems Pty Ltd trading as Verra Mobility Systems ABN 74 006 403 925 (collectively referred to as **Redflex Holdings Group**) are opposed to all forms of slavery.
- (b) This statement is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) (the **Act**) for the period of 1 January 2024 to 31 December 2024 by Redflex Holdings, as the only reporting entity in the Redflex Holdings Group for the purposes of the Act. In developing this statement, Redflex Holdings has engaged and consulted with its subsidiaries during the reporting period on their supply chain risks and preventative and remedial measures.
- (c) Redflex Holdings adopts the definitions of “slavery, servitude and forced or compulsory labour” and “human trafficking” in the Act.
- (d) At Redflex Holdings, we recognise our community responsibility in maintaining the protection of human rights through Redflex Holdings’ own ethical business practices. Redflex Holdings also recognises that the maintenance of human rights laws and standards is an important issue to our employees, customers, vendors, shareholders, stakeholders and the global community. Therefore, we seek to ensure that human rights are valued across Redflex Holdings’ businesses, operation and supply chain.
- (e) Redflex Holdings adopts a risk-based approach to modern slavery and human rights due diligence in its operations and supply chains.

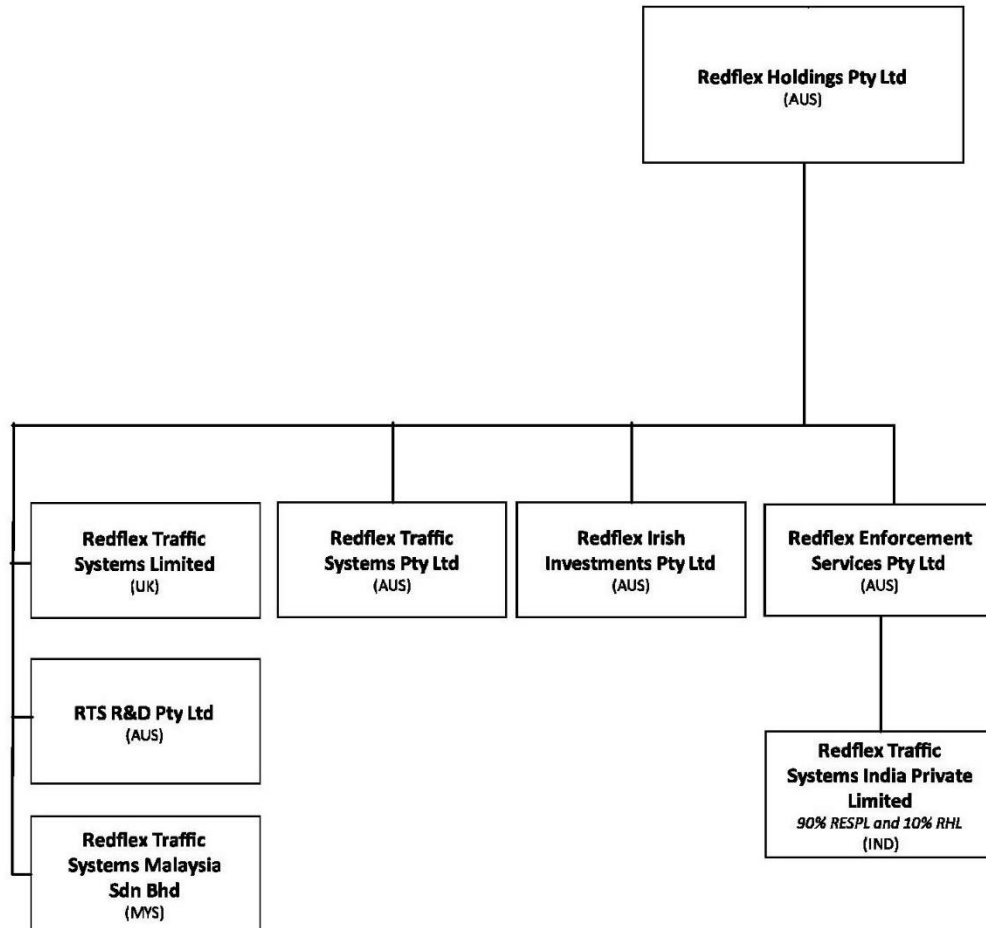
## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

- (a) Redflex Holdings is part of the Arizona-based and NASDAQ-listed Verra Mobility global corporate group (**Verra Mobility Corporate Group**). Redflex Holdings’ office is based out of South Melbourne, Victoria. Redflex Holdings manages global operations through various subsidiaries, including in Australia, New Zealand, South-East Asia and the United Kingdom.
- (b) Redflex Holdings has seven (7) subsidiaries spread across Australia, UK, Malaysia and India, as shown on page 4 of this Statement.
- (c) Redflex Holdings has established itself as a leader in traffic enforcement products and services. Redflex Holdings develops and manufactures a wide range of digital photo enforcement solutions including red light camera and speed camera systems, all utilising the most advanced sensor and image capture technologies.
- (d) Redflex Holdings runs its own systems engineering operations, system integration technologies and innovation centre for research and development. With our

continuous development of new safety products, Redflex Holdings has been helping to reduce collisions and to save lives for more than 25 years.

- (e) Redflex Holdings also works with various global vendors, business partners and other key stakeholders. We recognise that each entity within Redflex Holdings' operations and supply chains has its own independent obligation to observe human rights laws and standards.
- (f) Accordingly, while our operations and supply chains may be multifaceted, we endeavour to ensure that the issue of modern slavery is understood and respected and that applicable human rights laws and standards are observed. Our supply chain teams manages the Redflex Holdings Group supply chain to ensure our policies and practices are applied consistently by all entities within the Redflex Holdings Group. For example, our vendor due diligence screening for Redflex Holdings and its subsidiaries are centralised and conducted by one team that ensures modern slavery risks are consistently screened and the same preventative and remedial practices are applied consistently for our entities.
- (g) Redflex Holdings reasonably requires its supply chains, business partners and other key stakeholders to observe ethical business standards consistent with Redflex Holdings' policies, such as our Anti-Bribery and Anti-Corruption Policy and our Code of Business Ethics and Conduct (see the governance documents disclosed on our website ([www.verramobility.com](http://www.verramobility.com))), and remains committed to working with its supply chains, business partners and other key stakeholders to fulfil this aspiration.

## Redflex Holdings Group Structure Chart



### 3. OUR POLICIES AND GOVERNANCE

#### Policies

- (a) Redflex Holdings' policies and governance framework support its day-to-day operations and are intended to ensure all relevant commonly recognised and applicable human rights laws and standards are observed.
- (b) Redflex Holdings is committed to making positive contributions to society, consistent with the principles of honesty, integrity, fairness and respect. Consistent with these positive actions, Redflex Holdings has a suite of policies addressing these various issues within its operations such as:
  - (i) Anti-Bribery and Anti-Corruption Policy and Procedure;
  - (ii) Anti-Facilitation of Tax Evasion Policy (UK);
  - (iii) ANZ Anti-Discrimination Harassment and Bullying Policy (AU & NZ);
  - (iv) Charitable Donations and Corporate Sponsorship Policy;
  - (v) Code of Business Ethics and Conduct;
  - (vi) Code of Business Ethics and Conduct for Consultants;
  - (vii) Code of Business Ethics and Conduct for Product and Service Providers;
  - (viii) Equal Employment Opportunity Policy (UK, AU & NZ);
  - (ix) Records & Information Management Program Policy;
  - (x) Reporting Violations and Complaints Policy; and
  - (xi) Reporting Violations and Complaints Policy Australian Whistleblower Supplement (AU).
- (c) Redflex Holdings opposes discrimination, modern slavery and human rights abuse, and remains committed to safe working conditions. A new Human Rights & Anti-Modern Slavery Policy has been adopted in the reporting period of 1 January 2025 to 31 December 2025 by Redflex Holdings, the Redflex Holdings Group and the Verra Mobility Corporate Group. This policy further strengthens Redflex Holdings' commitment to addressing human rights and modern slavery risks within its operations and supply chain.

#### Governance

- (d) Issues of modern slavery in Redflex Holdings' operations and supply chains are managed by our supply chain team who identify, assess and manage modern slavery and human rights issues with our vendors. This is done through a variety of means including "knowing our vendors", being in regular contact with and personally visiting our vendors (where appropriate), conducting reasonable due diligence in relation to our vendors (and choice of suppliers) and reviewing and

assessing the performance of our vendors using qualitative and quantitative criteria.

- (e) Our supply chain team and business units record compliance obligations and risk management matters in Redflex Holdings' risk and compliance management and reporting system. These compliance obligations and risks are regularly reviewed and assessed, along with the identification and assessment of the effectiveness of Redflex Holdings' internal controls, processes, procedures and mitigation strategies to minimise both the occurrence and impact of any failure.
- (f) Ethical sourcing and human rights issues are overseen through regular reporting to the Government Solutions Risk Committee.

#### **4. RISKS OF MODERN SLAVERY PRACTICES**

- (a) Redflex Holdings recognises that the risks of modern slavery and human rights abuse can arise anywhere and in a variety of forms throughout its operations and supply chain.
- (b) Due to the global aspect of Redflex Holdings' operations and supply chain and the different prevalent work practices in different countries, we face risks related to the labour conditions of our global vendors for the various products and services that we source.
- (c) Redflex Holdings addresses this risk with:
  - (i) our modern slavery vendor due diligence process;
  - (ii) our suite of policies that applies to our employees and vendors;
  - (iii) inclusion and enforcement of contractual clauses for detection, prevention and remedy for modern slavery and human rights abuse practices; and
  - (iv) vendors relationship management to resolve and remedy identified risks.

#### **5. OUR RISK ASSESSMENT AND DUE DILIGENCE PROCESSES**

- (a) Redflex Holdings has adopted a risk-based approach to modern slavery and human rights due diligence and continues to review the risk across our operations and supply chains.
- (b) Redflex Holdings is focused on respecting the human rights of our employees and the human rights of those in our supply chains.

##### **Respecting human rights in our supply chains**

- (c) While our operations and supply chains are multifaceted, our aim is to ensure that human rights are respected and understood. Our due diligence includes the following actions:

### ***Establishing which suppliers to work with***

- (i) Taking a risk-based approach, the decision to conduct detailed due diligence on a vendor is based on the goods or services, industry, country of origin and particular vendor.
- (ii) Before we contract with a new vendor who may be identified as high risk, we may require that vendor to complete a self-assessment questionnaire.
- (iii) Redflex Holdings considers whether there may be any government-mandated trade sanctions or bans that may be in place against that vendor or the country in which it is located.

### ***Communicating our ethical and responsible sourcing policy to suppliers***

- (iv) Redflex Holdings will only contract with vendors to supply goods or services who operate in line with our policies, processes and standards. This is communicated in our contracts with suppliers with clauses requiring vendors to comply with our policies, processes and standards, and imposing reasonable and applicable modern slavery prevention and remediation obligations when required.
- (v) Vendors must agree to ensure that human rights are valued and respected across their business, operations, and supply chains and to remedy any adverse or at risk issues.

### **Building long-term relationships**

- (d) Redflex Holdings aims to build and develop long-term relationships with its vendors. Redflex Holdings believes that long-term relationships can lead to increased certainty on quality, to increased efficiencies and productivity and in the delivery of enhanced products and services while safeguarding human rights.

### **Process assessment and mitigation**

- (e) Redflex Holdings continues to increase its collaboration with internal and external stakeholders to identify and manage the risk of modern slavery and human rights abuse. Redflex Holdings is continuing to evolve its due diligence processes to aid in the identification of risks, expanding the scope of its supply chain risk assessment, reviewing existing processes and exploring ways to improve identification and action on risks throughout its supply chains.
- (f) Redflex Holdings plans to introduce periodic reviews of our processes and practices to assess their effectiveness for further improvement.
- (g) Redflex Holdings plans to continue to incorporate contract clauses addressing modern slavery and other human rights abuse issues into existing and new contracts and embed addressing modern slavery and other human rights abuse risk management into existing operational systems and processes.

### **Remediation**

- (h) If non-compliance by a supplier is identified, Redflex Holdings will initially work with the vendor towards a satisfactory resolution. The vendor will be required to address the identified issue within an appropriate period of time depending on the nature and severity of the non-compliance. If a vendor addresses non-compliance, it is deemed to be an “approved” vendor. In this way, our audit process is contributing to improving conditions for workers by working with suppliers to address any issues. If a vendor is not willing or able to address a critical breach, our business reserves the right to stop purchasing or working with that vendor.

### **Training and capacity building**

- (i) Redflex Holdings keeps its supply chain team up-to-date on ethical sourcing and applicable human rights commitments.

### **Effectiveness of grievance mechanisms**

- (j) Redflex Holdings places importance on the provision of effective company-based grievance mechanisms to escalate issues wherever human rights impacts occur in its operations. We continue to build the awareness and knowledge of our employees on human rights, encouraging them to speak up about any concerns they may have, without fear of retribution and with full confidentiality if required. They can speak up informally or through our whistle blower and human resources grievance channels. We also promote the provision and implementation of effective grievance mechanisms by our vendors.
- (k) Redflex Holdings’ supply chain team is responsible for building relationships with our supply chains and providing grievance channels. This has also been introduced within our new contracts with vendors, which include specific expectations on ensuring modern slavery and other human rights abuses does not take place within our supply chain.

## **6. REVIEW OF THIS STATEMENT**

- (a) Redflex Holdings will review this statement periodically to ensure it complies with applicable legal requirements and remains relevant and effective.
- (b) This statement is not intended to be contractual in nature.
- (c) Redflex Holdings’ Board of Directors may change this statement at any time.



## 7. CHANGE HISTORY

### Change History Log

Version	Description	Date
1.0	Initial Version	June 2025

*This statement has been approved by the Board of Directors of Redflex Holdings Pty Ltd.*



**Victor Wardrop**  
Director

Date: 27 June 2025