



Modern Slavery Statement

Under the Modern Slavery Act 2018 (Cth)

1 JULY 2024 – 30 JUNE 2025

This Modern Slavery Statement was approved by the Board of Royal Automobile Club of Victoria (RACV) Limited ("RACV") ABN 44 004 060 833 in its capacity as the principal governing body of RACV on 15 December 2025.

Pursuant to the requirements of the *Modern Slavery Act 2018* (Cth), the contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person.

This statement is signed by Greg Robinson in his role as President and Chairman of RACV on 15 December 2025.



Greg Robinson
President and Chairman
15 December 2025





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(MANDATORY CRITERIA - S.16(1)(A), (B) AND (F))

Our structure, operations and supply chains

Royal Automobile Club of Victoria (RACV) Limited (“RACV”) is pleased to submit its sixth annual statement pursuant to the *Modern Slavery Act 2018* (Cth) (“the Act”). This Statement describes steps RACV takes to identify, assess, and address potential areas of modern slavery risk in our operations and supply chains. All numbers, statistics and facts described in this Statement are as at 30 June 2025, unless otherwise stated.

Core operations - Who we are, what we do and our team

RACV is a mutual organisation, providing services to more than 2.29 million members in Victoria and over 500,000 customers with a growing presence nationally. Our purpose is to enhance lives through product offerings in the areas of motoring and mobility, home, cleaner energy, and leisure.

We provide a diverse range of products and services, with our core business activities including:

- Seven holiday resorts, located across Victoria and Queensland, two RACV Club and leisure facilities in Victoria, and a hotel in Hobart
- A network of 16 retail stores and eight agencies throughout metropolitan and regional Victoria

- Towing, transport and emergency roadside assistance services for our members
- Distribution and installation of Solar Power Systems (through RACV Solar)
- RACV Home and Motor Insurance and personal financial solutions
- Home trades services, property services, emergency home assistance

Our operations serve members and customers ranging from individuals and small businesses to large enterprises.

RACV's regional agencies are operated by independent local businesses, and all employees working in agencies are directly employed by the operator.

We have approximately 4,000 team members working across our offices, resorts, retail stores and other operations. Our employees are employed under applicable industry instruments, including modern awards, enterprise agreements or common law employment contracts.

Most of our employees across the group are permanent employees engaged on a full or part-time basis. Around a quarter are engaged on a casual basis. Approximately 45 per cent of our total team are in professional and administrative roles, and around 44 per cent fulfill roles in hospitality positions at our leisure facilities and resorts.

In addition, we engage more than 1,250 contractors, either directly or indirectly, for the provision of service delivery tasks such as towing, roadside assistance, emergency home assistance, home trades, home inspections and solar installation on behalf of the RACV Group.

Corporate structure – including controlled entities and consultation

RACV is the parent company that owns and controls the following operating companies which together form the RACV Group:

Table one: RACV owned and controlled entities

Company Name	Core business / Purpos
RACV Holdings Pty Ltd	Non-trading holding company
RACV Insurance Services Pty Ltd	Distribution of RACV Home and Motor Insurance
R.A.C.V. Finance Limited	RACV Personal Loans
RACV Investment Holdings Pty Ltd	RACV's investment portfolio and joint venture investments
Club Tasmania Holdings Pty Ltd	Owns and operates RACV Hobart Hotel
Arevo Pty Ltd	Real-time journey planning
Intelematics Australia Pty Limited	Telematics and connected vehicle services
Nationwide Group Pty Ltd (and its subsidiaries) ¹	Towing, transport and emergency roadside assistance services.
Home Trades Hub Australia Pty Ltd (and its subsidiaries) ²	Delivery org RACV home products including RACV Trades, RACV Emergency Home Assist, RACV Home Security, RACV Home Safety Inspections and PropertySafe Inspections
RACV Regional Services Pty Ltd	Leisure services at sites in rural Victoria
RACV Travel and Experiences Pty Ltd (and its subsidiaries) ³	Distribution and provision of holidays, travel experiences and member benefits.
Altius Property Group Pty Ltd	Property development

All the above owned and controlled RACV Group entities have been consulted in relation to the contents of this Statement and are subject to RACV's response framework for identifying, assessing and addressing potential modern slavery risks. The above individual entities are specifically referenced where such differentiation is appropriate throughout this Statement to provide more accurate information in relation to a reporting requirement. The Appendix lists entities in which RACV held a non-controlling interest/ investment during the financial year ending 30 June 2025.

1. Eastern Van Services Pty Ltd, Nationwide Roadside Services Pty Ltd, 134 Tow Pty Ltd, Nationwide Towing & Transport Pty Ltd, Fleet Company 2017 Pty Ltd, Leasetek Pty Ltd, Truck Tow Pty Ltd, Nationwide WA Pty Ltd (deregistered in January 2025)
2. RACV Security Pty Ltd, Club Home Response Pty Ltd, Property Safe Holdings Pty Ltd, Property Safe (Aust) Pty Ltd, PropertySafe Pty Ltd, Property Safe Administration Pty Ltd, Property Safe Ltd, Maintenance Manager Pty Ltd, Rapid Building Inspections Pty Ltd, Rapid Building Inspections IP Pty Ltd, HT International Pty Ltd, Home Repair Network Philippines Inc., RACV Solar Pty Ltd, Bedlam Enterprises Pty Ltd. (As flagged in our FY23 Statement, RACV Solar Pty Ltd (and its subsidiary Bedlam Enterprises Pty Ltd) was incorporated into the operations of Home Trades Hub Australia Pty Ltd during the FY25 reporting period).
3. Cliqit Pty Ltd

Key characteristics of RACV's supply chains

RACV's supply chain did not change significantly from the previous reporting period, in terms of the total number and types of direct suppliers engaged. In an environment that continued to be influenced by inflationary pressures, however, RACV experienced an increase in overall procurement expenditure across several categories.

RACV engaged with a population of over 4,000 unique suppliers which provided a broad range of goods and services. Our procurement practices typically involve sourcing goods either directly from local producers or through Australian distributors and service providers, with approximately 97 per cent of our suppliers being Australian domiciled. We do however acknowledge that many of these products may contain substantial inputs from international locations at deeper levels of the supply chain, which may include regions such as China and other major global manufacturing hubs.

International supplier composition has remained consistent with the previous reporting period. Some suppliers, predominantly in support services for marketing and information technology (IT), are located offshore in Europe, Hong Kong, India, Sri Lanka, New Zealand, North America, the Philippines, Singapore, South Korea, Vietnam and the United Kingdom.

Major spend categories include facilities management, roadside assistance services, technology (Software support and information technology (IT) hardware), professional services and marketing. A significant proportion of our overall procurement spend relates to our leisure and tourism business activities, along with our home and roadside assistance services.

RACV's major spend areas are outlined below:

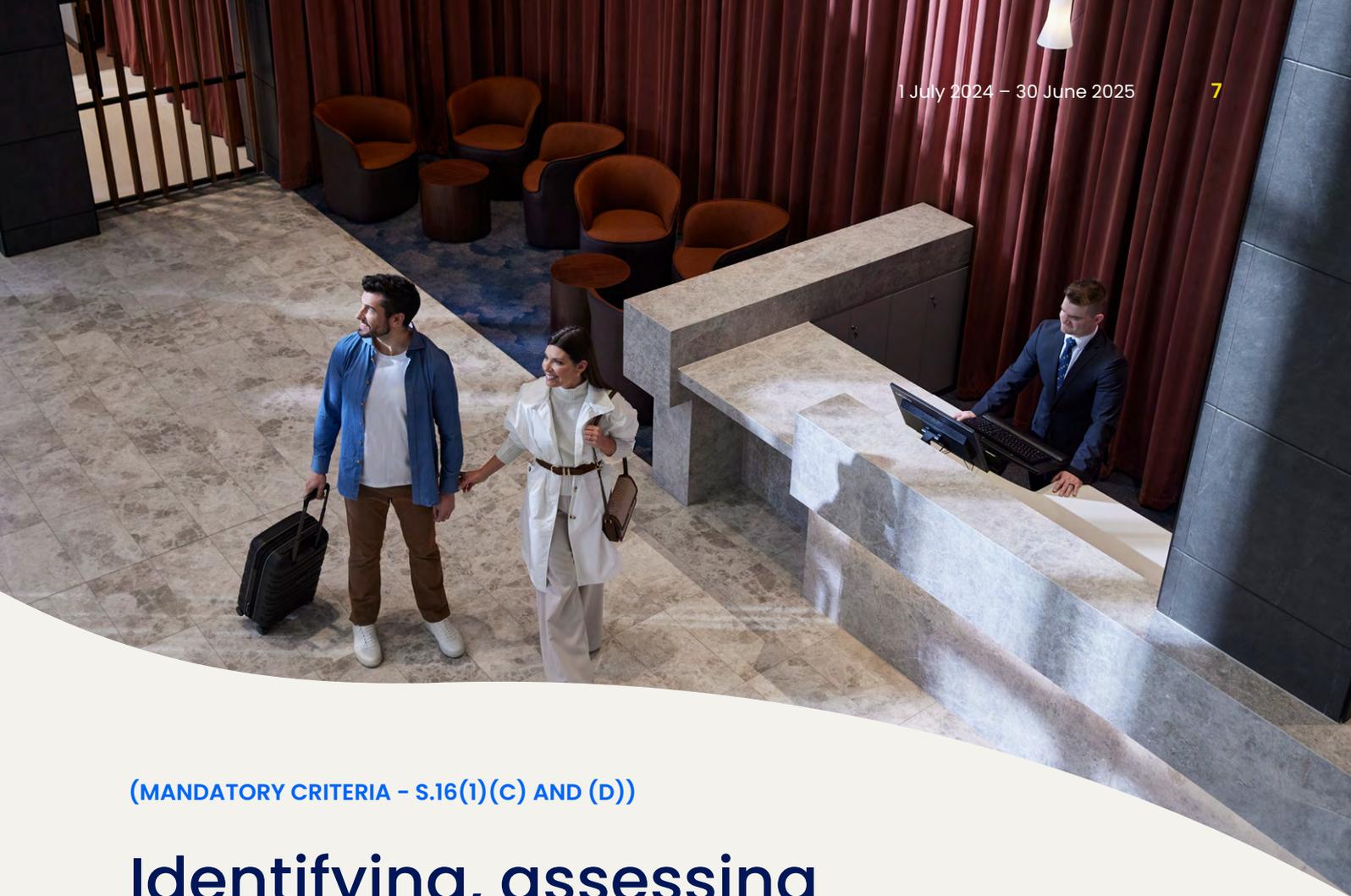
- Software providers
- Fleet services
- Home trades contractors
- Telecommunications networks and IT services
- Marketing, advertising and media
- Professional services (including legal, auditing and financial advisors)
- Recruitment and Human Resources (HR) services
- Construction/fit out equipment and services

Industry categories where RACV engaged with the largest number of individual (unique) suppliers include fleet services, facilities management, technology (IT services and software support), construction/fit out services and equipment, travel and experiences, food and beverages, professional services, and dry goods. Other significant supplier categories from a modern slavery risk perspective (RACV does not have high spend amounts within those categories) include:

- Employee uniform providers
- Professional cleaning services for our facilities
- Hospitality amenities
- Energy and electricity products and services
- Security services
- Retail and golf products

RACV continues to invest significantly in improving and maintaining its property portfolio across Victoria, Queensland and Tasmania. Each year, RACV undertakes a range of projects from new builds, refurbishments and fit outs through to ongoing asset upgrades and maintenance activities. During the reporting period, 482 individual works projects of this kind were undertaken.





(MANDATORY CRITERIA – S.16(1)(C) AND (D))

Identifying, assessing and addressing potential modern slavery risks

In our supply chains

RACV continued to apply our bespoke modern slavery risk model to assess the inherent risk in our supply chain, with no material changes to our overall risk profile identified as a result. The model, which is based upon the risk categorisations used in the Walk Free Foundation's Global Slavery Index, was also subject to its recurring annual review during the reporting period.

This year's comprehensive risk assessment identified approximately 1,100 suppliers with which RACV had spend (around 79 per cent of which are non-recurring spend) providing goods or services that are assessed, at an industry level, as having inherently elevated modern slavery risk, including:

- Building construction
- Property fit out
- Technology (IT hardware)
- Facilities management
- Cleaning
- Personal Protective Equipment (PPE)
- Fresh food produce (Australian)
- Other food items – including rice, fish, and products derived from cocoa
- Recruitment agencies
- Garments and apparel (including employee uniforms)
- Solar panels, inverters and high-tech batteries
- Recruitment agencies

Risks relating to imported solar panels – RACV Solar

As we have acknowledged in prior Statements, one of the most material modern slavery risks in RACV's supply chain is our procurement of solar panels. Our wholly-owned subsidiary RACV Solar is responsible for the distribution and installation of solar power systems, creating an ongoing operational reliance on this product line.

We continue to recognise the tension that exists between supporting the green energy transition and increased demand for renewable energy solutions, whilst ensuring that our procurement of renewable technologies does not entail an unacceptably high modern slavery risk.

As we have noted in prior statements, RACV is also aware of the bifurcation of solar supply chains across Southeast Asia, following the implementation of the *Uyghur Forced Labor Prevention Act* ('**UFLPA**') in the US.⁴ We recognise that this legislation has inadvertently increased

risk of tainted solar products being redirected towards Australian markets to avoid importation bans under the *UFLPA*.

Consistent with broader RACV procurement practices, RACV Solar primarily sources solar panels through Australian third-party wholesalers and distributors.

RACV Solar has introduced the practice of due diligence questionnaires as an embedded part of the onboarding process for all new solar suppliers, enabling assessment of modern slavery risks and assigning a risk rating based on supplier responses. This approach strengthens visibility across the supply chain and supports targeted engagement with suppliers in high-risk categories.

RACV's direct relationship with one major solar panel manufacturer has facilitated our ability to access traceability documentation on purchased panels and componentry, enabling ongoing transparency and enhanced due diligence of their supply chain. These traceability reports provide assurance on demand that our solar panels are being manufactured outside the Xinjiang Uyghur Autonomous Region. RACV continues to conduct regular manual screening of the *UFLPA* Entity List and media reports to remain abreast of any specific linkages between our primary solar supplier and allegations of forced labour risks to complement our existing risk management process.

As part of our FY25 commitment, RACV proactively engaged with other solar, battery and inverter manufacturers to explore their ability and willingness to provide similar traceability documentation, to enable transparency across our broader solar supply chain. These efforts will continue and form part of our broader commitment to ethical sourcing and proactive risk management.

In terms of the panels sourced from third-party solar panel wholesalers, we retain oversight over the brands (manufacturers) on-sold to us. This visibility means that we can independently assess the general modern slavery risks associated with the brands we purchase. In FY25, we continued to conduct desktop due diligence on our top suppliers (by spend) and oversight of brands distributed via third-party wholesalers in our solar, inverter and battery operations, focusing on the traceability of solar panels, inverters and batteries; supplier governance and labour practices; and geographical sourcing risks, particularly those linked to Xinjiang Uyghur Autonomous Region.

Supplier-specific due diligence and engagement

In this reporting period, across suppliers to all of our business lines, we conducted supplier-specific due diligence on 123 unique entities, approximately 66 per cent of which were high risk category suppliers and 44 per cent medium risk category suppliers. High risk supplier categories include:

- **Beverages** – Coffee, spirits, beer and cider, non-alcoholic beverages
- **Cleaning** – Dry cleaning, laundry and linen services, public area and office cleaning, housekeeping

- **Construction and fit out** – Furniture, fixture and equipment
- **Facilities management** – General facilities maintenance services, carpentry, electrical services
- **Food** – Seafood, dry goods, poultry
- **Home products and services** – Batteries and fast chargers
- **Hospitality amenities** – Room amenities
- **Human resources (HR)** – Recruitment and HR services
- **Technology** – IT hardware (acquisition and disposal) and maintenance
- **Uniforms**

Our strategic suppliers represent areas where RACV concentrates the majority of its procurement spend and/or operational activity and are therefore subject to enhanced scrutiny. The objective of this engagement was to ensure ongoing visibility of modern slavery risks and to reinforce supplier accountability in high-impact categories.

RACV's approach recognises that modern slavery risk may exist independently of other risk categories. Accordingly, suppliers assessed as low risk in areas such as financial stability or service disruption but identified as high risk for modern slavery due to sector, geography, or labour practices, were still required to undergo full due diligence. This ensures that modern slavery risk is addressed on its own merits and not overlooked due to low exposure in unrelated domains. This principle is embedded in RACV's broader risk governance framework and supports a consistent, risk-based approach to supplier engagement.

Each supplier was issued a detailed questionnaire and scored against RACV's internal risk framework to identify gaps and prioritise follow-up engagement. This process included reviewing supplier responses, assessing the depth of their supply chain oversight, and identifying areas where further clarification or documentation was needed. Where supplier responses lacked transparency or detail—particularly around subcontractor practices and supply chain visibility—RACV initiated internal reviews and escalated for further action. These reviews helped ensure that suppliers were not only aware of their obligations but were actively managing risks within their extended supply chains.

To mitigate identified risks, RACV proposed contractual obligations requiring suppliers to conduct due diligence on their subcontractors and provide supporting documentation. Example clauses were drafted to formalise these expectations, and monitoring frameworks were suggested to ensure ongoing compliance. These actions were integrated into RACV's broader modern slavery governance approach, which included annual supplier reviews, risk-based onboarding processes, and systematised due diligence through procurement platforms. This proactive engagement helped strengthen RACV's supplier accountability and alignment with ethical sourcing standards.

Ongoing media screening

RACV continues to monitor emerging modern slavery risks through the publication of a quarterly bulletin on

4. See further, A Crawford, LT Murphy et al, 'Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing' (Sheffield Hallam University, 2023). Available at: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/over-exposed>

our 'Modern Slavery Information Centre' on the firm's intranet. The bulletin consolidates current developments from news articles, press releases and regulatory changes, with a particular focus on risks affecting the Australian labour market and supply chains relevant to RACV operations. It highlights issues such as exploitative employment practices, vulnerable worker populations and geopolitical developments that may impact the ethical sourcing of goods.

The bulletin also provides insights into country specific risks associated with imported products, helping to identify and respond to potential exposure within the supplier network. Maintaining regular visibility of external risk signals complements broader due diligence efforts and helps to ensure modern slavery risk management remains responsive, informed and can support internal decision making.

In our operations

As an Australian company with all core operations situated onshore, we have not identified any area(s) of relatively elevated operational modern slavery risk. During the period there were no actual or suspected instances of modern slavery identified in our operations, reported, or otherwise brought to our attention.

However, we continue to recognise that, at an industry level within Australia, hospitality services (including those in connection with accommodation and tourism facilities) are characterised by inherent risk factors including jobs with lower entry barriers that are filled by lower skilled workers and a proportionally higher casual and foreign migrant workforce.

Consistent with our well-established approach that continues to be practiced, RACV's overall employment risk mitigation framework includes:

- Pre-employment checks and induction training
 - Employees undergo a right to work check as well as mandatory compliance training to understand their rights and responsibilities in the workplace
- Payment of all employees at or above award, with regular salary benchmarking to ensure employees are paid fairly
- Provision of targeted modern slavery training and awareness
- Well established whistleblower policies, grievance procedures and risk control mechanisms, which are subject to regular review to ensure that they remain effective
- Participation in internal and external audits to maintain ISO 45001:2018: Occupational Health and Safety Management Systems under the governance of WorkSafe Victoria

Policy and governance framework

RACV's internal policy and governance framework for responding to modern slavery risk has now been in operation for several reporting periods. Relevant policies continue to include:

- RACV Code of Conduct
- Fair Treatment Policy
- Health, Safety and Wellbeing Policy

- Diversity Equity and Inclusion Policy
- Hours of Work Policy
- Fitness for Work Policy
- Flexible Work Arrangements Policy
- Employee Assistance Policy
- Complaints Disputes and Grievances Policy
- Whistleblower Policy

RACV continues to implement periodic initiatives aimed at greater employee awareness and acknowledgment of RACV's policies. New and existing employees complete appropriate and ongoing training on workplace related risks, including mandatory compliance training. In the previous financial year, policy harmonisation with the rest of the RACV Group for our two largest subsidiaries, Nationwide and HTHA, was achieved. In FY26, we plan to transition some of the subsidiary-specific policies created in the harmonisation program to Group-wide policies that apply uniformly to RACV and its wholly owned entities.

In relation to in-force grievance procedures, concerns may be raised:

- anonymously with FairCall, RACV's externally managed whistleblowing reporting service under the Whistleblower Policy;
- directly with managers, line managers and RACV's People and Culture function under our Complaints, Disputes and Grievances Policy;
- directly with People and Culture under our Fair Treatment Policy; or
- via the RACV Whistleblower Investigation Officer.

These policies and reporting mechanisms are subject to regular review to ensure they remain fit for purpose for reporting complaints and concerns relating to potential modern slavery issues.

RACV has recently reviewed its Modern Slavery Risk Management Guidelines and confirmed they remain fit for purpose. The guidelines meet the requirements of the Modern Slavery Act 2018 (Cth), incorporating definitions of modern slavery, risk management principles, governance roles and responsibilities, issue escalation and redress mechanisms, and reporting protocols. They also reflect RACV's commitment to taking action to prevent or reduce the risk of modern slavery and to cooperate in remedying harm where victims are impacted.

Standard contract provisions addressing modern slavery issues

Aligned with our established internal policy and governance framework, RACV has a well-embedded goods and service template agreement which contractually requires our suppliers to address modern slavery risk issues.

Express supplier obligations under the agreement include:

- Compliance with modern slavery laws and regulations and confirmation that neither their employees nor their subcontractors have been convicted or investigated for modern slavery offences
- Maintaining appropriate records about their risks of modern slavery, compliance with modern slavery related legislation and information to assist RACV in mapping our supply chain.
- Agree to submit to modern slavery related audits conducted by RACV or our appointed representative.

- Assurance that subcontracted labour or services meet the same modern slavery compliance standards, thereby cascading consistent standards and expectations throughout the supply chain.

RACV's standard goods and services agreement includes a right of termination where a supplier fails to comply with modern slavery legislation, including obligations to report accurately and in a timely manner under the modern slavery act. These contract provisions have been updated in FY25 and are now being progressively implemented across RACV's operations, including rollout for Nationwide suppliers. This rollout reflects RACV's commitment to embedding consistent modern slavery standards throughout our supply chain and ensuring that all suppliers – regardless of location – are held to the same expectations.

Industry engagement and collaboration

RACV remains actively involved in external events aimed at improving our overall modern slavery response. Throughout the reporting period, RACV representatives attended several industry training and information events including:

- Tier 2 and Beyond: Supply Chain Risk Management (webinar sessions with Informed 365)
- Meeting with the Cleaning Accountability Framework to learn more about their work and the risk of Modern Slavery risk in the cleaning industry and how they plan to address and mitigate this risk
- Understanding the Australian Government's response to the Modern Slavery Act Review (webinar sessions with Fair Supply)
- Modern Slavery compliance: protecting your business and reputation (webinar sessions with Sparke Helmore Lawyers)

Internal training and capacity building

RACV's modern slavery training is mandatory with refresher frequency set at every two years for a targeted cohort of employees, including:

- Employees who engage with internal stakeholders to promote awareness and alignment on modern slavery strategies (for example, executives, legal and procurement)
- Employees involved in external engagement with labour hire providers and recruitment agencies to uphold ethical standards
- Roles involving procurement, contract management, or the sourcing and hiring of people

Training is delivered via an online module which is updated yearly to maintain up-to-date content. Modules were updated recently with new content from the NSW Anti-Slavery Commissioner's public resources. Topics covered include:

- Guidance on what modern slavery practices look like, including distinguishing modern slavery from other forms of labour exploitation, to assist employees in identifying modern slavery in their day-to-day roles
- Contextualising the prevalence of modern slavery, including within Australia

- Modern slavery red flags, with a focus on identifying suspicious employment practices and vulnerable workers
- Practical actions that team members can take to raise concerns

Relevant employees of RACV had a 93 per cent completion rate for our modern slavery training. We continue to ensure that our employees remain up to date with the required compliance training, including on modern slavery issues.

During the previous reporting period, RACV extended mandatory compliance training to employees of our wholly owned subsidiaries, HTHA and Nationwide, as part of a broader initiative to harmonise and integrate our modern slavery response framework across the Group, and this approach is now fully embedded.

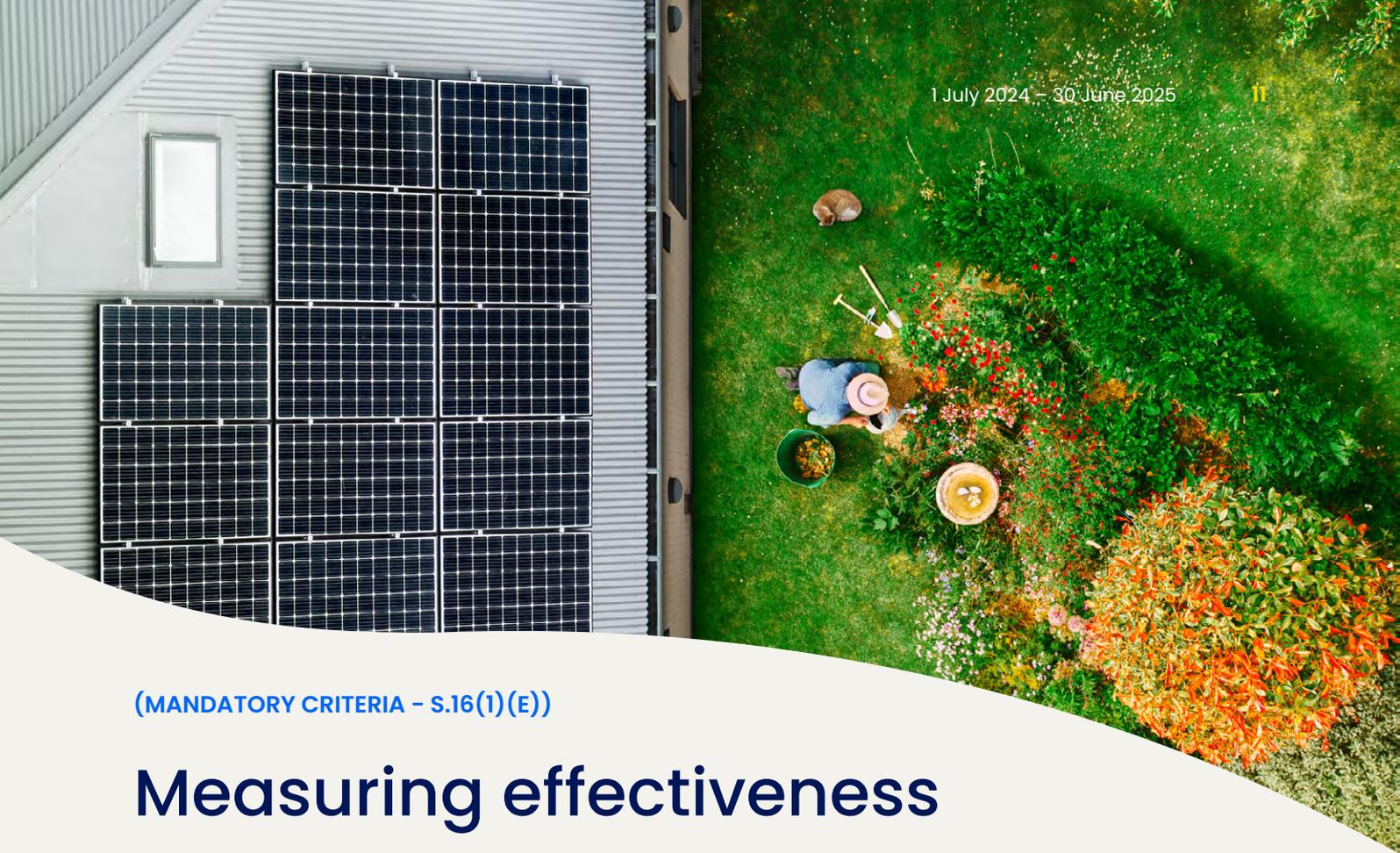
During RACV's organisational restructure towards the end of FY25, a review was initiated to enhance the delivery of modern slavery training through automated allocations based on role type. This process, which commenced in FY25 and will continue into FY26, supports the automatic delivery of modern slavery compliance training and strengthens role-based allocations across RACV and its subsidiaries.

Remedial action

RACV continues to operate to a suite of documented redress principles for significant non-compliance with our basic expectations for managing modern slavery risk. These principles reflect RACV's preference of working collaboratively with suppliers to address risk where practical to do so. However, in more critical incidences, our redress principles envisage more definitive action, including:

- If RACV's actions directly cause modern slavery, the organisation will cease the activity and cooperate in remedying the harm to affected individuals
- RACV may engage, or require the supplier to engage, an independent third party to audit the supplier and certify to remediation of identified risks
- Potential suspension of active purchasing from a supplier pending demonstration that the supplier has addressed identified areas of unmitigated risks, or a genuine commitment to doing so
- RACV's preparedness to exercise contract termination rights in sufficiently serious cases

Whilst in previous reporting periods, RACV has had cause to apply these principles in practice (as reported in prior statements), we have not identified in FY25 any instances of alleged worker exploitation or indications of specific modern slavery related issues in our supply chain. We continue to undertake due diligence on our suppliers as described above and conduct regular scanning activities, including monitoring the Fair Work Ombudsman (FWO) website, to help maintain awareness should our direct suppliers be implicated in any allegations of worker exploitation, modern slavery or other high-risk activities. As and when such issues arise, we will continue to manage known incidents in accordance with our redress principles.



(MANDATORY CRITERIA – S.16(1)(E))

Measuring effectiveness

RACV considers that a key feature of an effective modern slavery response is one that looks beyond each individual reporting period. Part of such a continuous improvement approach is to demonstrate continuity of performance between planned measures described for an upcoming reporting period and what is achieved. Accordingly, RACV has compiled the following list of such of planned measures from last year's Statement and provided corresponding details on actual performance:

Table two: Progress for FY25

Planned focus area for FY25 (per our 2024 Statement, p.13)	Progress update for this reporting period
<p>Invest in people capability to identify and manage modern slavery risk</p>	<p>Ongoing</p> <p>RACV is progressing with rolling out automated assignment of modern slavery training across relevant roles according to role type and updated annually to reflect emerging risks and regulatory developments (set out in Internal training and capacity building).</p> <p>In parallel, we had maintained ongoing communication in the first half of FY25 with an Non-Government Organisation (NGO) operating in a high-risk sector to explore practical strategies for reducing modern slavery risk (set out in Industry engagement and collaboration).</p>

Planned focus area for FY25 (per our 2024 Statement, p.13)	Progress update for this reporting period
<p>Maintain robust governance of modern slavery risk, aligned with the organisation’s evolving risk exposure profile.</p>	<p>Ongoing</p> <p>RACV has actively monitored proposed changes to the Modern Slavery Act 2018 (Cth) and taken preparatory steps to implement any required adjustments in line with regulatory timelines. While key governance and operational measures have been achieved, RACV will review the recently published Australian Anti-Slavery Commissioner’s Strategic Plan to inform further updates in FY26.</p> <p>RACV has reviewed its Modern Slavery Risk Management Guidelines and confirmed they meet current legislative requirements and align with industry practice. We will be reviewing and making changes to the guidelines in FY26 to ensure alignment with our updated risk appetite (as set out in Policy and governance framework).</p>
<p>Investment in modern slavery risk identification should be appropriate to its operations and supplier relationships and consistent with community expectations part of supplier management lifecycle</p>	<p>Complete (and ongoing)</p> <p>Improved approach to modern slavery risk monitoring and further due diligence for higher risk suppliers is in operation (as set out in Supplier-specific due diligence and engagement).</p> <p>Standardised application of due diligence for new suppliers in the solar space has been introduced, although no new suppliers have been onboarded since introduction of due diligence (as set out in Risks relating to imported solar panels – RACV Solar).</p> <p>We continued to monitor developments in third-party environmental supplier screening tools to potentially replace current manual screening.</p>
<p>RACV’s investment in modern slavery risk mitigation will be appropriate to its operations and supplier relationships, consistent with community expectations and part of the supplier management lifecycle</p>	<p>Complete (and ongoing)</p> <p>RACV now uses a standardised set of responses to address incoming modern slavery questionnaires and information requests, drawing on previous examples to ensure consistency and alignment with its risk management framework. We will continue to build out standardised responses as new questions are introduced. Where questionnaires require bespoke responses, RACV works directly with relevant business units to provide tailored information.</p> <p>RACV continues to embed and maintain open communication with stakeholders when modern slavery issues arise or circumstances change, using established reporting channels and methods outlined in regular governance and risk reporting processes.</p> <p>RACV has published a notification and information on how to raise modern slavery-related concerns, including clear contact points and instructions for using RACV’s reporting mechanism, Risk Hub.</p>
<p>RACV will progress its modern slavery risk understanding and risk management maturity</p>	<p>Ongoing</p> <p>Fulfill commitments made in RACV’s 2025 Modern Slavery Statement.</p>

(REPORTING CRITERIA – S.16(1)(G))

RACV's Planned focus areas for FY26

RACV is committed to continuously improving the Group's approach to assessing and addressing modern slavery in our operations and supply chains. As part of this, RACV has identified the following actions as priority areas that we will be seeking to implement in the FY26 reporting period and beyond.⁵

Table three: Priority areas for FY26

Pillar	Principles	Planned activities
Knowledge / capability building	RACV will invest in people capability to identify and manage modern slavery risk	<ul style="list-style-type: none"> Enhance and apply dynamic provisioning of Modern Slavery online learning platform LEX module to applicable roles of RACV and subsidiary employees (ongoing from FY25). Continue to deepen relationships with NGOs in specific high-risk areas, business organisations and other groups participating in dialogue on modern slavery.
Governance framework	Governance of modern slavery risk will be consistent with risk exposure	<ul style="list-style-type: none"> Monitor the outcomes of the September 2025 review of the <i>Modern Slavery Act 2018</i> (Cth), the Anti-Slavery Commissioner's Strategic Plan and any subsequent legislative changes. This includes assessing implications for RACV's governance framework and operational responsibilities, and implementing appropriate updates to our Modern Slavery Guidelines, supplier contract provisions, and internal reporting mechanisms.
Risk identification	RACV's investment in modern slavery risk identification will be appropriate to its operations and supplier relationships and consistent with community expectations part of supplier management lifecycle	<ul style="list-style-type: none"> Monitor developments in third party environmental supplier screening tools to potentially replace the current web-based screening activities. Explore and begin application of the use of Artificial Intelligence to help monitor modern slavery risk in our supply chain. Conduct a targeted review of seafood and fruit and vegetable suppliers in the context of upcoming contract extension and tender processes.
Risk mitigation	RACV's investment in modern slavery risk mitigation will be appropriate to its operations and supplier relationships, consistent with community expectations and part of the supplier management lifecycle	<ul style="list-style-type: none"> Review and harmonise employment-related policies across RACV to strengthen anti-slavery practices. Maintain active dialogue with suppliers, prioritising high-risk sectors including continuation of engagement with RACV Solar's primary manufacturers to obtain traceability reports and monitor for forced labour risks.
Commitment to ethical principles / learning	RACV will progress its modern slavery risk understanding and risk management maturity	<ul style="list-style-type: none"> Continue engaging with industry bodies, NGOs and professional services firms to strengthen RACV's modern slavery response. RACV will also explore opportunities for victim-informed learning to enhance ethical decision-making and support survivor-centred approaches. Fulfill commitments made in RACV's 2025 Modern Slavery Statement.

⁵ **Disclaimer:** This Modern Slavery Statement contains certain forward-looking statements about anticipated modern slavery actions planned to be undertaken by RACV in the next reporting period. These statements reflect RACV's reasonable expectations as at the date of preparing this Statement. Such forward-looking statements are predictive and are subject to risks, uncertainties and other factors that could cause actual action to differ from planned activities. Any forward-looking statements are not to be taken as guarantees, representations, warranties or assurance of RACV's future performance or certainty that planned actions will be achieved.

Appendix One – RACV list of entities with non-controlling interest

In addition to our owned and controlled entities detailed above at Table one, RACV also held non-controlling interest in the following entities as at 30 June 2025:

- Insurance Manufacturers of Australia Pty Limited
- Australian Motoring Services Pty Ltd
- Club Assets Pty Ltd
- Club Assist Corporation Pty Ltd
- Vehicle Repairhub Pty Limited
- Deep Blue Company Pty Ltd
- Real Estate Agent Select Limited⁶
- JET Charge Pty Ltd
- Vendor Compare Pty Ltd trading as PropTech Labs
- Narrabundah Technology Holdings Pty Ltd⁷
- Landchecker Holdings Pty Ltd⁸
- Before you Buy Pty Ltd
- Accel Services Group Pty Ltd

⁶ RACV has completed the divestment of Real Estate Agent Select Limited in March 2025.

⁷ RACV has completed the divestment of Narrabundah Technology Holdings Pty Ltd in May 2025

⁸ As disclosed in our 2025 Annual Report, this entity is categorised as a joint venture. Despite holding a majority of the voting rights, RACV does not have control over Landchecker Holdings Pty Ltd due to its inability to unilaterally direct the relevant activities without agreement from the other shareholder, as required by AASB 10 *Consolidated Financial Statements*. Specifically, the shareholder agreement between RACV and our joint venture partner does not grant RACV authority to control the day-to-day operational management of the entity.





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RACV
Home Assistance

Staying Safe Together
racv.com.au/covid-19



Level 7, 485 Bourke Street
Melbourne Victoria 3000

Royal Automobile Club of Victoria
(RACV) Limited
ABN 44 004 060 833

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