



MODERN SLAVERY STATEMENT 2024-25

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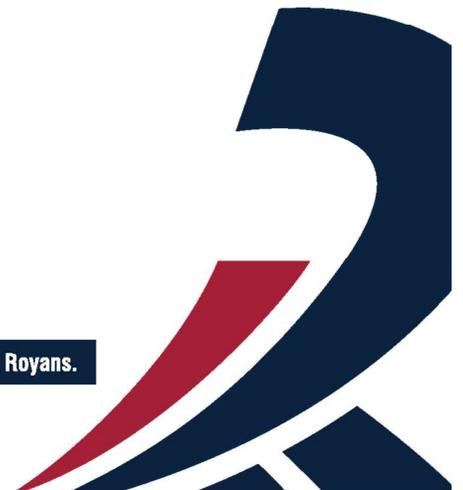
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Contents

We have addressed the mandatory criteria detailed in the *Modern Slavery Act 2018* as follows:

Section	Requirement	Reference in our Statement
16(1)(a)	Identification of the reporting entity	Our Statement page 5
16(1)(b)	Description of our structure, operations, and supply chain	Our Structure, Operations and Supply Chains page 7
16(1)(c)	Description of the risks of modern slavery practices in our operations and supply chains and any entities we own or control	Risks of Modern Slavery Practices page 10
16(1)(d)	Description of the actions we have taken to assess and address these risks (including due diligence and remediation processes)	Actions taken to Assess & Address Modern Slavery Risks page 13
16(1)(e)	How we assess the effectiveness of our actions	Assessment of the Actions Taken to Address Risks page 19
16(1)(f)	Description of the process of consultation with any entities the reporting entity owns or controls	Our Statement page 5
16(1)(g)	Provide any other relevant information	Moving Forward - Our Modern Slavery Goals page 21





1. A message from Our CEO

Modern slavery continues to be a critical global concern, affecting millions of people across industries and borders. At Royans, we continue to recognise our responsibility to identify, respond to and contribute to the eradication of modern slavery in all its forms. Modern slavery has no place in our business or our supply chain. We are committed to understanding our connection to human rights impacts and working collaboratively with our business partners to mitigate adverse effects.

Our mission is to eliminate every barrier that prevents our customers from getting back on the road and back to business. This commitment shapes the way we make decisions, design initiatives, refine processes, and build partnerships.

As we rely on diverse suppliers for goods, services, and equipment, we take a due diligence approach to ethical sourcing. We prioritise working with suppliers who foster safe, inclusive, and respectful workplaces.

This statement outlines the steps we took during FY25 and strategies we aim to implement in FY26 to manage the risks of modern slavery. It includes a review of our internal operations and supply chains, with a focus strengthening and embedding a robust process to prevent and address modern slavery risks.

We acknowledge that the greatest risk lies indirectly within our supply chain. While there is no single solution to human rights challenges, we remain committed to continuous improvement. This includes enhancing our supplier engagement, increasing transparency, and providing training to our team to better identify, monitor, and manage modern slavery risks. Together, we are building a more ethical and responsible supply chain – one that reflects our values and our commitment to human rights.



David Church
Chief Executive Officer



2. Our Statement

This modern slavery statement, published in accordance with the *Modern Slavery Act 2018* (Cth), sets out the steps taken by Royans Group to identify and address its modern slavery risk over the period 1 July 2024 - 30 June 2025 (FY25).

This joint statement has been prepared on behalf of the following reporting entities:

- Royan Group Holdco Pty Ltd
- Royan Group Midco Pty Ltd
- Royan Group Bidco Pty Ltd

This statement also includes information in relation to the other wholly owned members of the Royans Group, including:

- Royans Melbourne Pty Ltd
- Royan Truck & Trailer Repairs Pty Ltd
- Royans Brisbane Pty Ltd
- Royans Newcastle Pty Ltd
- Royans Wagga Pty Ltd
- Royans Dubbo Pty Ltd
- Royans Wodonga Pty Ltd
- Royans Dandenong Pty Ltd
- Trucking Supplies Bidco Pty Ltd
- Bill O'Brien Smash Repairs Pty Ltd
- TFI Group Pty Ltd
- Royan Group New Zealand Operations Ltd

Royan Group Holdco Pty Ltd, Royan Group Midco Pty Ltd and Royan Group Bidco Pty Ltd, and the entities they own or control, are managed centrally, with shared governance, policies and procedures pertaining to human rights risks. Due to this centralised management structure, a segregated consultation process pertaining to the entities owned or controlled by the reporting entities, and the reporting entities was not required. Each of the reporting entities were engaged with the entities they own or control on an ongoing basis, as part of this amalgamated approach, which greatly facilitated the preparation of this joint statement. References to 'our' and 'we' in this Statement are references to the Royans Group.

This statement describes our progress during the reporting period, outlines our position, approach and key learnings in relation to modern slavery risk management and seeks to provide readers with a transparent view of our risks, actions and areas for improvement.

This modern slavery statement was approved by the Board of the Royan Group Holdco Pty Ltd as parent entity.



William Andrews
Chair



David Church
Group CEO & Director

19 December 2025



4. Our Structure, Operations and Supply Chains

Royans Group has over 606 employees in Australia and New Zealand.

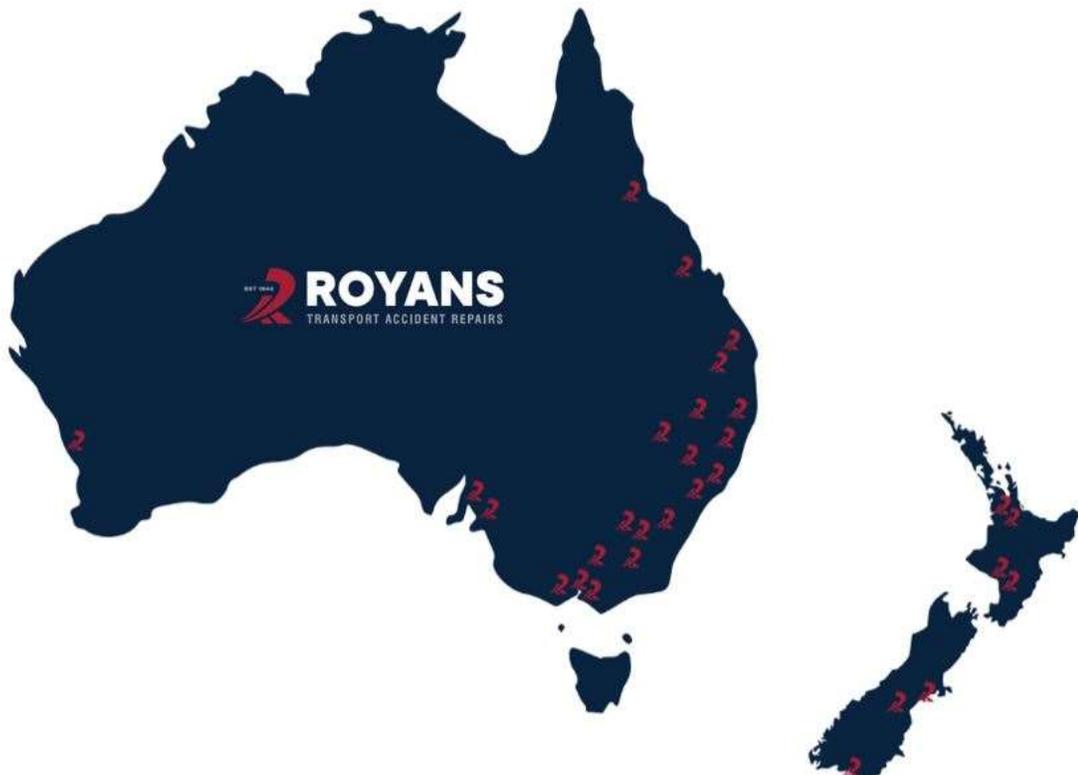
The registered office of Royans Group Holdco Pty Ltd is 14 Royan Place, Bayswater North VIC 3153.

Our Services

We provide a range of services for all types of commercial vehicles including:

- truck repairs
- trailer repairs
- bus & coach repairs
- earth moving repairs
- defence equipment repairs
- chassis alignment
- fibreglass repairs
- paint & refinishing
- powder coating
- sandblasting
- fleet imaging & signage
- trailer manufacturing & servicing
- truck & 4WD spare parts

Royans are the trusted leaders within the transport industry and currently have the largest branch network in the region, consisting of 27 branches throughout both Australia and New Zealand.



Our Suppliers

Throughout FY25, we focused on conducting a deeper review of our major suppliers to identify any indicators of modern slavery within their operations or supply chains. These assessments are outlined in detail in Section 6 of this statement.

Building on the foundations laid in previous years, we continued to strengthen relationships with key suppliers, reinforcing our shared responsibility to assess and address modern slavery risks. In FY25, we expanded our focus to include additional high-risk sectors and reviewed both existing suppliers and potential new providers under consideration by Royans.

Our operations involve collaboration with third-party service providers, and we acknowledge the inherent risks that may arise in these partnerships. We expect all suppliers—current and prospective—to uphold high ethical standards, operate legally, and maintain professional conduct. Compliance with the Royans Supplier Code of Conduct is a core requirement, and we actively encourage our suppliers to promote these standards throughout their own supply chains.

Our review of product and service supply chains will remain a key focus during FY25.



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5. Risks of Modern Slavery Practices

Supply Chain Transparency

During FY25 we continued our desktop-based review of the Royans supply chain to help identify potential modern slavery risks. This process focused on evaluating suppliers against key risk indicators, which remain central to our assessment framework:

- **Sector and industry risk** - identifying industries known to carry higher exposure to modern slavery practices;
- **Product and services risk** - assessing the nature of goods and services procured and their associated vulnerabilities.
- **Geographic risk** - considering the country of origin and its regulatory environment, labour protections, and prevalence of exploitation

These indicators guided our prioritisation of suppliers for further review and informed our broader risk management strategy.

In FY25, Royans reviewed several product and service categories. Building on previous years, we expanded our scope to include:

- **Security services**
- **Cleaning services**
- **Promotional merchandise and marketing materials**
- **All new suppliers**, regardless of category.

These areas were selected based on known risk indicators such as industry vulnerability, geographic sourcing, and the nature of the services provided.

While our major suppliers are generally internationally recognised organisations with their own modern slavery reporting obligations—making direct risk relatively low—we remain vigilant. Our focus is on identifying risks deeper within supply chains and ensuring all suppliers meet Royans' ethical standards, reflecting our commitment to transparency and responsible sourcing.

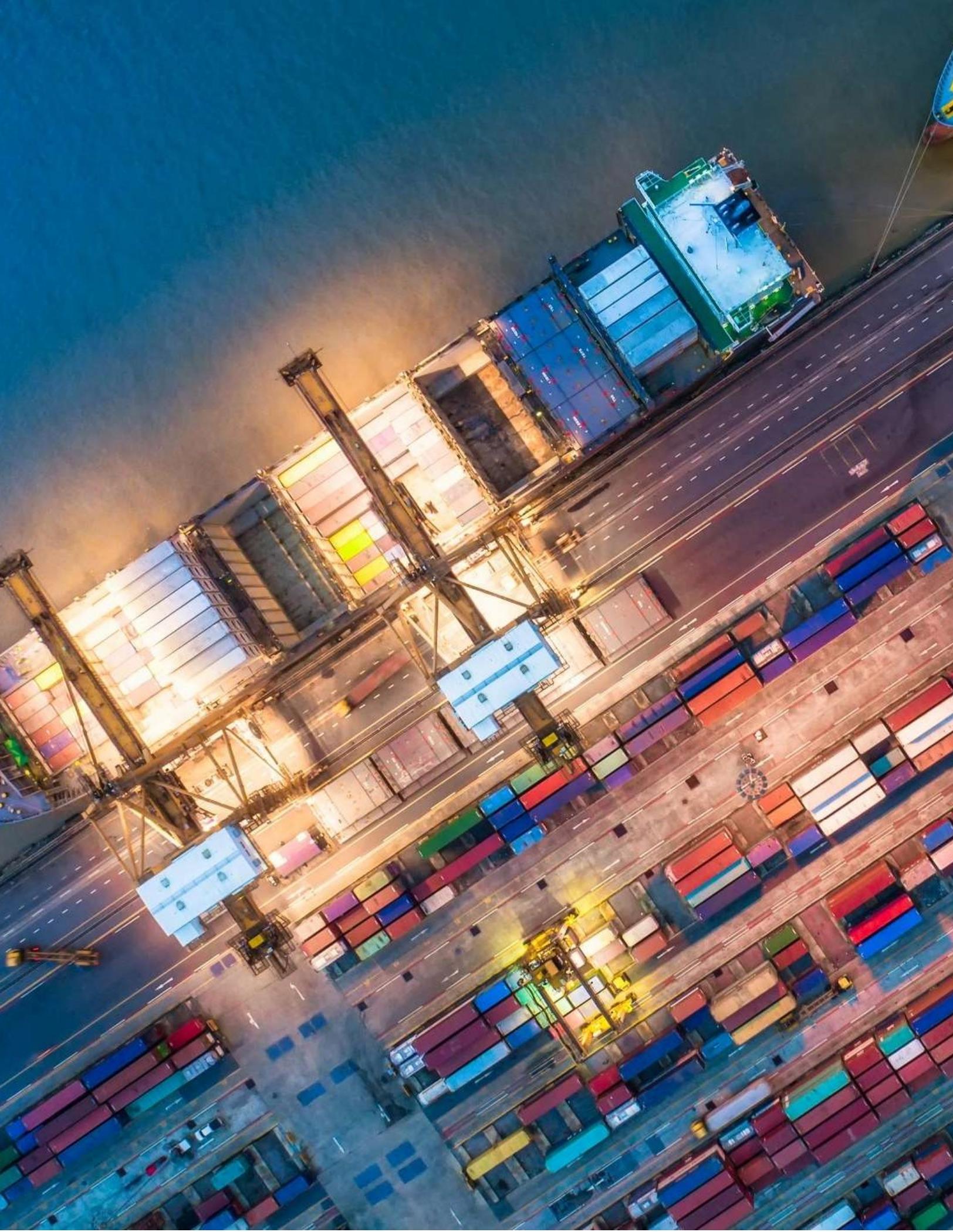
Migrant Workers

The ongoing shortage of skilled labour across our industry has continued to impact operations. To address this, Royans has expanded its international recruitment efforts, engaging highly skilled migrant workers to supplement our local workforce.

We recognise that migrant workers—particularly those without secure legal work status—can be more vulnerable to modern slavery risks. As part of our commitment to 'responsible recruitment', Royans conducts thorough due diligence when engaging recruitment suppliers and only partners with immigration consultants who uphold ethical hiring practices. Australian and New Zealand immigration laws are also very strict, and Royans ensures we abide by all of these laws.

All migrant workers employed by Royans are hired as full-time staff, not through labour hire or contract arrangements. They receive the same terms, conditions, and remuneration as their Australian and / or New Zealand counterparts, ensuring fair treatment and preventing exploitation.

As outlined in Section 6, Royans maintains a range of policies and support mechanisms to protect the rights of all employees. These include our Employee Code of Conduct, Grievance Policy, Whistleblower Policy, Equal Employment Opportunity Policy, Employment Agreements, Modern Slavery Policy, and our Employee Assistance & Wellbeing Program. Together, these frameworks promote a safe, respectful, and inclusive workplace for all.



6. Actions taken to Assess & Address Modern Slavery Risks

Supplier Code of Conduct.

The **Royans Supplier Code of Conduct** outlines the minimum standards of ethical and responsible behaviour expected from all suppliers. We actively support our suppliers and business partners in meeting—and exceeding—these standards outlined in the Code.

Royans has made it clear that non-compliance with the Code may result in corrective action, including the potential termination of agreements or cessation of business. Upholding these standards is essential to maintaining ethical and transparent supply chain practices.

The Royans Code of Conduct requires that all suppliers to Royans must:

- agree to take steps to identify and eliminate:
 - slavery or forced servitude of any kind;
 - trafficking in persons;
 - forced labour;
 - debt bondage;
 - labour facilitated by any form of coercion or deception;
 - child labour;in all of the supplier's (and any authorised sub-contactor's) operations and supply chains;
- comply with all relevant local laws and regulations - and where a conflict in law or requirements arises, apply the highest standard;
- adopt and adhere to conditions of employment for workers that ensures non-discrimination, respect and safeguards their rights under local labour laws and regulations;
- provide a safe and healthy workplace - which meets or exceeds the requirements of all relevant health and safety laws or requirements and is designed to prevent accidents or injury to workers;
- ensure that all workers are paid a fair living wage and all legally mandated benefits - which should be at least the minimum wage required by applicable local laws or industry standards;
- ensure workers are not required to work in excess of the number of hours permitted by applicable local law;
- provide transparency in relation to any relevant supply chains and operations - including disclosure to Royans of sources of raw materials, manufacturing sources or other information relating to the supply of goods or services - upon request from Royans or its authorised representative;
- provide to Royans (upon request), information regarding sustainability, workforce, country of origin and other information relevant to the provision of services or the manufacture of products that are supplied to Royans;
- ensure third parties acting on their behalf comply with the Royans Code of Conduct;
- not enter into transactions with Royans that would create a conflict of interest;
- not offer excessive gifts or entertainment that would have an adverse effect on Royans reputation;

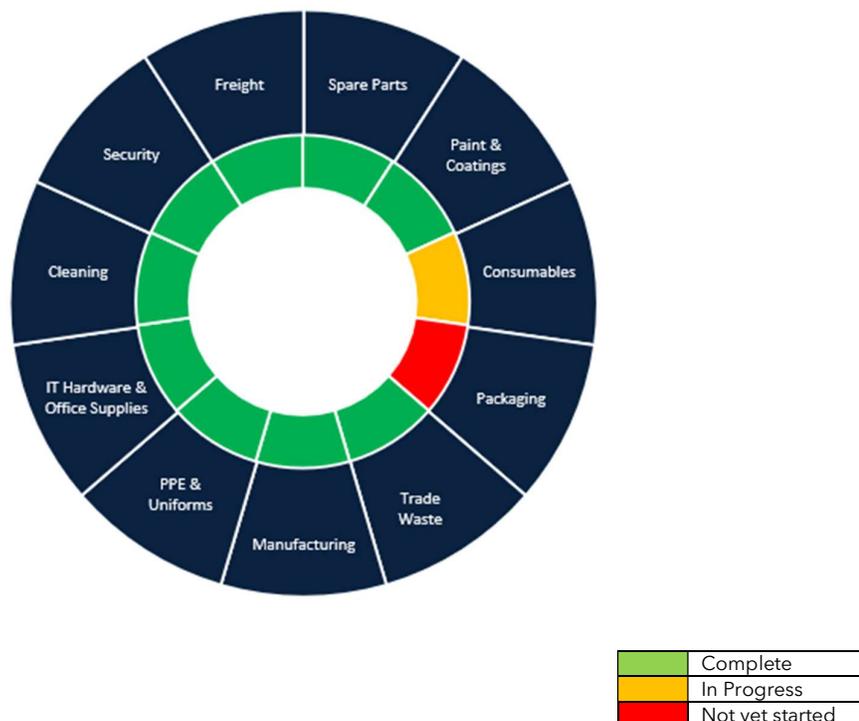
- comply with all applicable local laws and regulations on corruption, bribery, prohibited business practices, competition and antitrust;
- maintain environmentally responsible and sustainable business practices that comply with all laws and regulations in the countries where the supplier operates; and
- Comply with all applicable privacy laws and secure confidential information including all personal and sensitive data against unauthorised access or misuse. Where personal information is collected or shared for legitimate business purposes or legal reasons it should be treated with care and protected in accordance with relevant privacy laws and regulations

Supplier Review and Audit Processes

Royans continues to strengthen its approach to identifying and addressing modern slavery risks across our operations and supply chains. We recognise that supply chain mapping is essential to understanding where risks may exist and how we may be linked to unethical practices.

In FY25, we focused on reviewing our major suppliers through a desktop assessment. This includes vetting potential suppliers during onboarding and requesting completion of a **supplier questionnaire** along with a signed copy of the Royans **Supplier Code of Conduct**. We also applied the same process to existing major suppliers, selected based on factors such as total spend, country of origin, ‘direct shipping’ methods, and the nature of goods or services provided. These checks are now embedded into our routine due diligence procedures to ensure consistent and ethical supplier engagement.

Our major categories of procurement are detailed below, along with our review progress:



As part of our due diligence process, the questionnaire component gathers information about business practices, workforce composition, and supply chain management, helping us better understand the ethical standards of those we engage.

Some of the modern slavery risk related questions we asked suppliers were:

1. Are their workers on short term contracts?
2. What percentage of workers are on short term contracts and what percentage are permanent?
3. If any of the workers that they contract are sourced directly from overseas countries (using labour recruiters) or promised jobs with their business before they come to Australia or New Zealand?
4. If they were aware of any low-skilled migrant workers working in their organisation's supply chains?
5. Does the business have a genuine worker grievance mechanism - where workers can make complaints about their working conditions or wages?

We also asked suppliers to confirm (if they could) that:

- that the business has employment systems, policies and procedures in place to comply with relevant labour laws in Australia or New Zealand;
- all workers are paid their legal pay entitlements, on time and provided with pay slips clearly showing how wages have been calculated and details of any deductions;
- whether their organisation is required to publish a Modern Slavery Statement in accordance with the Modern Slavery Act and that they supply us a copy if available;
- if their organisation has policies and processes to identify, investigate and remedy the risk and any instances of Modern Slavery within their organisation
- that the business provides training to their employees on modern slavery risk factors;
- they will supply us with any current independent audit reports or certification documents that are available to them to demonstrate their compliance with the relevant requirements set out in SA8000, WRAP, BSCI, SEDEX, SMETA, FRDM, FSLM etc;
- if they conduct any due diligence or screen prospective suppliers for Modern Slavery risks on suppliers; and
- what action their organisation takes if Modern Slavery practices are suspected or discovered.

We reviewed the responses received from our supplier questionnaires and found no evidence of modern slavery risks among the submissions.

Many of our major suppliers are larger organisations that are also required to submit their own modern slavery statements. Several have shared relevant documentation and policies with us, which we have retained for reference.

Royans remains committed to continually improving our practices to ensure modern slavery or human trafficking have no place in our supply chain.

Modern Slavery Training

Royans continues to roll out targeted modern slavery training to key staff groups as part of our awareness and prevention strategy. In FY25, training was delivered to customer-facing teams, including reception, estimators, and sales staff.

This builds on previous years, where training was provided to Corporate Services, Senior Leadership, Branch Managers, Safety, Finance, Parts, and Area Management teams. New staff joining relevant departments also receive training as part of their onboarding process.

The training modules covered topics including:

- Understanding modern slavery
- Compliance with modern slavery
- The role procurement employees play in combating modern slavery
- Indicators of modern slavery risks and some practical tips on how to assess for these risks
- The importance of knowing our suppliers and taking a risk-based approach
- Tools that can be used to help mitigate modern slavery risks throughout the procurement cycle
- How to report any concerns

The training also provides staff with an understanding of Royans' reporting obligations under the *Modern Slavery Act 2018*, along with insights into global legislation and initiatives aimed at addressing modern slavery.

We remain committed to expanding this training across our broader workforce and new starters, supporting ongoing awareness and ethical practices throughout the business.

Internal Policies and Processes

Royans has continued to develop and refine internal policies to help manage and mitigate modern slavery risks.

These policies reflect our commitment to ethical conduct and integrity across all business relationships, supported by systems and controls designed to prevent modern slavery within our supply chain.

Our modern slavery measurement and evaluation framework is structured to promote transparency and drive continuous improvement in how we identify, assess, and respond to potential risks.

Examples of our policies and procedures which strengthen our control environment pertaining to modern slavery risks are provided below.





7. Assessment of the Actions Taken to Address Risks

At the end of FY25 we reviewed our **Modern Slavery KPIs** to assess our efforts in addressing our modern slavery risks.

FY25 Modern Slavery KPI Review

	KPI	Objective	FY 25 Outcome
Our People	Modern Slavery Training	Provide modern slavery training to all customer-facing staff across Australia and New Zealand.	75.64%
	Whistleblower Complaints Received	The number of whistleblower complaints related to modern slavery risks received via a grievance mechanism.	0
Our Partners & Suppliers	Supplier Questionnaires Completed	The percentage of supplier assessment questionnaires completed in FY25.	62.50%
	Governance Concerns Raised	The percentage of supplier assessment questionnaires with governance concerns flagged/incomplete information.	0%
	Modern Slavery Issues Identified	The number of modern slavery issues identified.	0
	Remediation Actions Taken	The number of remediation actions taken with suppliers.	NA



8. Moving Forward – Our Modern Slavery Goals

Royans is committed to taking practical steps where possible to address risks of modern slavery that may be identified in our supply chain. We will develop a set of future actions and KPIs for continued improvement, to focus our work in FY26, which will include:

Modern Slavery Training

We will further launch our current training to additional members of the Royans team and any new starters. This ongoing program ensures staff remain informed about our ethical standards, reporting obligations, and the importance of identifying and addressing modern slavery risks across our operations.

Policy Review

We will continue to regularly undertake, and review the effectiveness, of our standard processes regarding compliance with the Act. As part of this continuous improvement approach, we will undertake a review of the following policies and controls to implement any recommendations provided:

- Modern slavery policy
- Grievance mechanism & policy
- Whistleblowing policy

Product Supplier Review

We will remain focused on supplier reviews, in order to assist us to further identify the modern slavery risks that may be present in our supply chains. We will work to identify and assess potential supplier risks of selected high risk vendors in the consumables and packaging categories.

Commitment to Continued practices & FY26 KPI's

We will continue to track the following indicators of the effectiveness of our modern slavery program.

Focus area	Key Performance Indicator
Training	Percentage of staff members that have undertaken modern slavery training.
Supplier engagement	Percentage of suppliers that have completed the assessment questionnaire in FY26.
	The percentage of supplier assessment questionnaires with governance concerns flagged/incomplete information.
	The number of modern slavery issues identified.

Grievances The number of grievance complaints related to modern slavery risks received.

Remediation The number of remediation actions taken with suppliers.



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