

# MODERN SLAVERY STATEMENT



# Modern Slavery Statement

## Introduction

This statement is Infomedia's first Modern Slavery Statement (**Statement**) and covers the period 1 July 2021 to 30 June 2022 (**Reporting Period**).

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

## About Infomedia

Infomedia's global leading ecosystem of 'Software as a Service' (SaaS) and Data as a Service (DaaS) solutions empowers automakers and their dealer networks to manage the vehicle and customer lifecycle. Infomedia's data-driven solutions are used by over 250,000 industry professionals, across 50 automaker brands and in 186 countries to create a convenient customer journey, drive dealer efficiencies and grow sales. Infomedia has led innovation in retail automotive technology for more than 28 years and continues to expand its reach within the three regions in which it operates. For more information, please visit Infomedia's website <https://www.infomedia.com.au> and YouTube channel <https://www.youtube.com/infomedialtd>.

## Infomedia's structure, operations and supply chains

The Infomedia Group is headquartered in Sydney Australia and operates offices in Melbourne, Cologne, Cambridge, Atlanta and Detroit.



The Group is comprised of Infomedia Ltd and wholly owned subsidiaries including IFM Americas Inc. SimplePart LLC, IFM Europe Ltd and IFM Deutschland. The Group employs approximately 360 people globally across these offices with approximately 55% of the workforce situated within Australia with the balance located in Germany, the United Kingdom and the United States of America.

## Infomedia's guiding values and objectives

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

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

- **Accelerating Performance** – We are accountable to our stakeholders and action orientated.
- **Driving Innovation & Service** - We aim to be cutting edge, always first and continuously seeking to evolve. Our technology leadership empowers our customers.
- **Navigating Global, Steering Local** – We are 'One Infomedia' and we all share the same vision. We have a unified customer approach with local execution. Customer centricity is the key to our success.
- **Having Fun in the Fast Lane** – We balance hard work with a fun and vibrant workplace that encourages creativity and expression. Our culture is open and welcoming. We encourage our people to flourish as professionals at work and as individuals outside of work. not clear why this reference is here

## Infomedia's position on Modern Slavery

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

## Addressing Modern Slavery Risk

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

### Policies

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

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

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

## Supplier due diligence and risk assessment

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

We have risk assessed the material elements of our supply chain, and we continue to assess and identify risk of modern slavery using the following key factors to guide the supplier assessment process:

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

Based on our assessment of the relevant factors, we consider that the risk of modern slavery in its supply chain is relatively low and/or sufficiently mitigated for the following reasons:

- our direct employees are domiciled in jurisdictions with strong employment and human rights protections;
- given the software and technology nature of our business, our direct supply chain primarily consists of skilled service providers with higher education qualifications;
- when sourcing from external parties, we aim to source goods and services from reputable and well-established suppliers;
- where practicable, the Company ensures appropriate contractual terms and conditions with third parties which prohibit the use of exploited labour in the provision of goods and/or services to Infomedia; and
- where key suppliers of third-party personnel and contractors are engaged in jurisdictions the Company takes additional steps to develop strong relationships with key vendors and their personnel. In some instances, this has included on-site visits to suppliers based in South-East Asia to meet suppliers and their personnel in person and to directly observe operations.

## Education

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

## Assessing our measures

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

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

The Company will seek to identify and implement data capture to support more formal reporting and self-assessment metrics over the next 12 months.

### Consultation and approval

This statement has been prepared in consultation with the directors of the Group entities and is made in accordance with the Act for the Reporting Period ending 30 June 2022.

This Statement was approved by the Board of Directors of Infomedica Ltd on 23 December 2022.



Jens Monsees  
CEO and Managing Director of Infomedica Ltd  
23 December 2022