

# Australian Modern Slavery Statement for the Financial Year 2024

## Introduction

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the “Act”). It outlines the steps taken by Veyance Technology Australia Pty Ltd trading as ContiTech Australia Pty Ltd and Vulcanite Pty Ltd with respect to the actions taken during the year ending December 31, 2024. This statement covers all subsidiaries subject to mandatory reporting obligations in Australia (hereinafter collectively referred to as “ContiTech Australia” and “we”), which are part of the Continental Group and belong to the group sector ContiTech.

ContiTech Australia principal activities during the year were the manufacture and import and distribution of conveyor belts predominantly for the resources industry and the provider of innovative and flexible engineering solutions which includes field service operations to mining customers.

This statement has been prepared in consultation with members of the reporting entities (refer to annexure) and of our respective group sector. As part of a global company, we have a role to play in efforts to promote respect for human rights in business activities, and we are pleased to provide insight into the actions we have taken to understand, prevent and reduce the risk of forced labour in our operations and supply chain.

## Corporate profile

Continental consists of Continental Aktiengesellschaft (AG) and its worldwide subsidiaries (collectively, “Continental” or “Continental Group”) and is divided into four group sectors: Automotive, Tyres, ContiTech and Contract Manufacturing. Since November 1, 2024, these have comprised a total of 15 business areas.

A group sector or business area with overall responsibility for a business, including its results, is classified according to product requirements, market trends, customer groups and distribution channels.

Overall responsibility for managing the company lies with the Executive Board of Continental Aktiengesellschaft (AG). The Automotive, Tyres and ContiTech group sectors are each represented on the Executive Board.

Spanning the group sectors are the group functions of Continental AG, which are represented by the chairman of the Executive Board, the chief financial officer, and the chief HR officer. These functions include Finance and Controlling, Integrity and Law, Compliance,

Internal Audit, Quality Management, Human Relations, Sustainability, IT and Group Purchasing

With a 62% share of consolidated sales (previous year: 64%), the automotive industry – with the exception of the replacement business – was Continental’s most important customer group in the 2024 fiscal year.

The second-biggest market segment for Continental was the global replacement-tyre business for passenger cars and commercial vehicles, with 27% of total sales in the 2024 fiscal year (previous year: 25%).

The third-biggest market segment for Continental was the global business with industrial customers and spare parts from the ContiTech group sector with around 9% of total sales (PY: 9%).

## Sustainability management

Sustainability is a driver of innovation for Continental during the current transformation of mobility and industry and is thus firmly anchored in its corporate strategy in the cornerstone of “turning change into opportunity.” Sustainability is also a key component in Continental’s vision of “CREATING VALUE FOR A BETTER TOMORROW.”

In Continental’s sustainability ambition, Continental describes how it wants to shape this transformation in the relevant topic areas with respect to sustainability in order to reduce negative impacts and strengthen positive effects, seize transformation opportunities and mitigate transformation risks. Along with the relevant guidelines, this ambition constitutes the framework for existing management approaches, strategies, programs, processes, and targets, as well as their further development. In our four focus areas of sustainability, we are committed to strong, visionary ambitions, which we want to achieve by 2025 at the latest, together with our partners along the value chain:

- › 100% carbon neutrality,
- › 100% emission-free mobility and industries,
- › 100% circular economy, and
- › 100% responsible value chain.

The entire ambition can be found at [www.continental-sustainability.com](https://www.continental-sustainability.com).

Within the Executive Board, the Executive Board member for Group Human Relations (director of Labor Relations) and Group Sustainability is responsible for sustainability. Sustainability


management within Continental Group is regulated by dedicated sustainability rules.

The Group Sustainability group function is further supplemented by sustainability functions in the group sectors as well as coordinators in several business areas and countries, which includes Australia. The sustainability functions in the group sectors and in the Continental Group were further expanded and strengthened over the course of 2024.

The Sustainability Steering Committee of the Continental Group is responsible for assessing cross-functional issues, weighing up opportunities and risks and discussing relevant Executive Board decisions in advance. In fiscal year 2024, it consisted of the entire Executive Board, Group Sustainability and other functions at group and group sector level. The committee is chaired by the Executive Board member for Group Human Relations (director of Labor Relations) and Group Sustainability and managed by the head of the Group Sustainability group function. Our group sectors, Tyre and ContiTech, also have their own interdepartmental sustainability committees, which are coordinated by the relevant sustainability functions.

## Policies in relation to fighting child labour, forced labour & modern slavery in own operations and in supply chains

Continental operates in complex global value chains that are exposed to a variety of risks associated with the violation of protected rights. Risks within this context are always related to the potential negative impact on people and the environment.

Continental has therefore defined and published its commitments toward a responsible value chain (hereinafter Responsible Value Chain Commitments, "RVC Commitments" for short) in the areas of labour standards, occupational safety and health, security practices, environment and land rights:  RVC Commitments. We have adopted the RVC Commitments as part of the Continental Group. Three of our RVC Commitments focus on rejecting child labour and forced labour and fostering respect for human rights throughout the value chain. These commitments apply to our own operations with Continental in Australia and in particular to our direct suppliers. More specifically:

**No child labour.** Continental firmly rejects any form of child labour and specifically respects the standards of the International Labour Organisation. Continental does not employ, nor do any of its Australian subsidiaries, people under the age of 15 or under the age at which compulsory schooling ends or under the applicable country's minimum age for employment, whichever is greatest. Furthermore, young workers under the age of 18 need to be treated with special diligence and should not perform work that is likely to jeopardise their health, safety, and/or development.

**No forced labour & modern slavery:** Continental firmly rejects any form of forced labour, modern slavery, debt bondage, trafficking, or any other form of labour not conducted voluntarily or non-compliant with the International Labour Organisation's standards. This includes any form of oppression in the vicinity of

the workplace, be it economically or of any other kind. Workers must be provided with documented employment terms or an offer of employment in a language the person should be able to understand. Migrant workers need to be treated with special diligence and shall receive the relevant work-related information prior to their departure from their country of origin and must always have access and full control over their identity or immigration documents.

**Supply Chain.** Continental collaborates with its business partners to foster respecting adequate standards throughout the value chain. Continental expects its suppliers to respect human and environmental rights as referenced in the RVC Commitments and applicable laws. Furthermore, Continental's suppliers are required to implement adequate due diligence processes. These are dedicated to identify, prevent, and mitigate risks of negative impacts on human and environmental rights in their operations and supply chains, including appropriate grievance mechanisms and reporting. Continental is committed to support its business partners and especially its suppliers, e.g., through but not limited to adequate monitoring systems, corrective action plans, and training.

These commitments address the defined risk categories and formulate what is expected of Continental's business units and employees globally, as well as of its direct suppliers. On top of this, Continental has anchored further prevention measures in its own business units and with respect to direct suppliers. Within Continental's responsible value chain due diligence system (RVCDDS), our Code of Conduct defines the fundamental requirements for our employees, while the Business Partner Code of Conduct defines the fundamental requirements for our suppliers and their suppliers with regard to human rights, working conditions, environmental protection, conflict minerals and anti-corruption. The Business Partner Code of Conduct is updated regularly, most recently in fiscal 2024, to reflect changes or adjustments to relevant legislation. For suppliers of natural rubber, our sourcing policy for sustainable natural rubber additionally applies.

## Management system

Continental has established a comprehensive management system to ensure our RVC Commitments with regard to human and environmental rights, including our rejection of child labour, forced labour and modern slavery. This system enables us to identify, address and mitigate associated risks within our own business operations and our supply chain.

Within the management system, responsibilities (including the appointment of a human rights officer for Continental), rules and processes are clearly defined, including risk mitigation measures and control mechanisms. The management system will continue to evolve as the dynamic economic, social, and environmental conditions develop further.

Continental has established a system that ensures a controlled escalation through hierarchy, a so-called "three lines of defense" model. In this model, principles and processes cover the functional areas of:

› Strategy development and implementation

- > Management of regulatory requirements
- > Risk management
- > Incident management (including whistleblower system)
- > Training
- > System monitoring
- > Reporting

The internal responsibilities are defined within the framework of a corporate policy (Group Policy Responsible Value Chain). This policy defines the areas of responsibility of the Executive Board, the business areas, Continental's human rights officer and relevant functions, and represents the binding framework for the management system to ensure due diligence in a responsible value chain. It includes due diligence within our own business operations, for direct suppliers and in relation to indirect suppliers. The persons relevant for implementation receive general, position-related and risk-specific training. The Executive Board of Continental AG is informed at least once a year by the human rights officer on the current status, effectiveness, appropriateness as well as on measures for improvement and potential advancement of the management system. Suitable improvements to the management system as a whole and to selected elements thereof are defined on this basis. The management system is part of Continental's overarching risk, compliance, and control system.

## Risk management and risk analysis

Continental operates in complex global value chains in which a variety of risks relating to infringements of protection rights may arise. In this context, a risk is always related to a potential negative impact on humans and the environment.

The main goal of risk management is the mitigation of these risks. Continental has therefore set up a specific risk management within its management system, which includes appropriate, regular risk analyses to determine the human rights and environmental risks in our own business operations and with regard to direct suppliers. As part of the risk analysis, Continental uses dedicated risk categories identified in a multi-stage process, evaluated, weighted, and prioritised - especially based on the requirements of the German Supply Chain Act and other relevant legal requirements. In gross terms, without taking existing preventive measures into account, all risk categories are considered as relevant for our own business operations and for the supply chain in relation to direct suppliers.

The defined risk categories refer to the risks of potential violations of protected rights in relation to child labour and forced labour, among others.

The risk analysis of our own business operations in Australia and of the supply chain in relation to direct suppliers follows a systematic and standardised method to ensure comparability and take special organisational features into account on an equal basis. In particular, factors such as business models, ability to intervene, contribution and probability of occurrence as well as severity are taken into account. Along defined steps, the relevant risks are

identified, assessed, weighted, and prioritised. Not only are the gross risks taken into consideration, but also the existing preventive measures and the net risks derived from them. Thanks to extensive preventive measures, the net risks are significantly lower than the gross risks. The latter arise from the global footprint of the business activities and supply chains, the broad range of the product portfolio and the various business models and value chain levels. Prioritised risks are then analysed and evaluated in greater detail in order to derive targeted priority prevention measures.

Based on the risk analysis carried out in the 2024 fiscal year, and in coordination with the respective central functions, the two risk categories equal treatment / antidiscrimination and working conditions (including working hours) were formally prioritised for our own business operations, as well as three risk categories equal treatment / anti-discrimination, no forced labour & modern slavery, and environmental impacts were formally prioritized for the supply chain in relation to direct suppliers. An analysis of risks in relation to indirect suppliers is carried out on an ad hoc basis in cases of substantiated knowledge. Regardless of the prioritisation, all risk categories are part of the risk management.

## Preventive measures

As a central prevention measure at the group level, Continental has adopted its [RVC Commitments](#) and communicated them publicly. These address the defined risk categories, which were confirmed as part of the risk analysis, and the associated expectations regarding our own business operations and employees, direct suppliers, and along the supply chain. In addition, further group-wide prevention measures were anchored in our own business operations and towards direct suppliers.

The group-wide prevention measures apply to all Continental companies, including its subsidiaries in Australia, are the subject of the annual system monitoring and include in particular:

- > The integration of the management system into the essential corporate control processes and frameworks;
- > The [Policy Statement of Continental AG](#) on compliance with human rights and environmental due diligence obligations in supply chains [2024](#);
- > The [RVC Commitments](#), which explicitly include our rejection of child labour and forced labour within our human rights and environmental commitments;
- > The [Continental Code of Conduct](#), which includes, among other things, explicit rejection of any form of child labour or forced labour and the human rights and environmental-related expectations that we set for our employees;
- > The [Continental Business Partner Code of Conduct](#), which includes, among other things, the prohibition of child labour and forced labour and any forms of modern slavery as part of the human rights and environmental expectations that we place on our suppliers and require them to pass down to their own suppliers and subcontractors; and
- > General and topic-specific training on the management system.

In addition, specific prevention measures have been implemented in our own business operations and in relation to the supply chain. These measures are improved on an ongoing basis, particularly based on the risk analysis. They include, among other things, environmental and occupational health and safety systems for our own business operations, appropriate procurement strategies and practices, contractual agreements, and control mechanisms, as well as training measures in relation to the supply chain. Furthermore, membership in relevant associations and platforms, participation in multi-stakeholder dialogue formats as well as initiatives and industry dialogues are also part of the actively pursued preventive measures.

In the case of substantiated and verified knowledge of risks from direct or indirect suppliers, appropriate preventive measures are agreed and tracked.

The implementation of the management system also includes risk-based controls with regard to the preventive measures taken.

## Corrective Measures

If we discover potential adverse human rights allegations, we will investigate them and, if substantiated, pursue corrective measures, engaging and cooperating with affected stakeholders where appropriate. Continental's management system defines the framework for taking corrective measures within its own business operations worldwide, including Australia, and in relation to direct suppliers and, if necessary, indirect suppliers. Corrective measures are implemented promptly and appropriately in the event of violations within our own business operations. The corrective measures relating to direct suppliers follow a duty of care and are aimed at rectifying the violation. If a violation cannot be rectified immediately, appropriate action plans are drawn up to end the violation or at least reduce it appropriately with respect to direct suppliers. Corrective measures relating to indirect suppliers also follow a duty of care. As a last resort, we reserve the right to terminate the relevant business relationships in an appropriate manner.

## Responsible Sourcing

Responsible sourcing is the responsibility of the relevant purchasing organisations, which are established at Continental by group sector, product group and country, for example. A corporate purchasing network regularly deals with responsible sourcing topics as well.

Sustainability aspects are taken into consideration at various points in supplier management. On the basis of various criteria, for example, selected suppliers are assessed with the help of self-assessment questionnaires and evaluations through sustainability platforms, which include questions regarding the management of human rights and working conditions, including child labour and forced labour, and the submission of supporting documentation. In addition to receiving assessment reports generated through this process, selective local audits or other audit activities—such as in relation to the existence of suppliers'

## Communication and Training

Continental communicates its management approaches on labour standards and workers in the value chain through diverse channels. This includes Continental's website, the published annual report and internal communication platforms which host trainings as well as the internal frameworks. In addition, posters and on-site training courses make relevant information available to employees who do not have access to the IT infrastructure. Furthermore, through integration into the onboarding process, new employees are also familiarized with Continental's standards right from the start.

Furthermore, stakeholders involved in implementing the management approaches have clearly defined roles within Continental's RVCDDS and are trained on the associated responsibilities to enable effective collaboration and execution of the management approaches.

Training initiatives for suppliers are also carried out to further promote shared responsibility along the entire value chain. In addition, direct suppliers are requested to sign the Business Partner Code of Conduct. The communication is thus aimed at affected stakeholders as well as stakeholders involved in the implementation.

## Complaints procedure

Continental's existing group-wide complaints procedure, the Continental Integrity Hotline, has been supplemented within the framework of the legal requirements of the German Supply Chain Act and is available to Continental employees and external parties. The Continental Integrity Hotline is open, among other things, for complaints regarding potential violations of human rights and environmental rights and lists these topics. The Continental Integrity Hotline and Integrity Platform are both publicly available and can be accessed, for example, via Continental's [website](#). The legally required rules of procedure are also stored there. Reports can be made both in writing and by telephone. Availability by telephone is ensured through national and international telephone numbers. Both options are available 24/7. The instructions for using the Integrity Platform can be found under the keyword "Step-by-step reporting" and are available in multiple languages. Instructions for using the telephone hotline are also available in multiple languages.

Continental uses the services of EQS Group AG, one of the leading providers in the area of IT-supported reporting channels, for both complaint channels. This secure and anonymous whistleblowing system protects the whistleblower through an encrypted reporting channel. All informants can remain anonymous if they wish. Confidentiality is ensured within the framework of the legal provisions in the case of non-anonymous reporting. The persons entrusted with carrying out the complaint procedure are obliged to maintain confidentiality within the framework of the legal requirements and act independently. The effectiveness of the Continental Integrity Hotline and Integrity Platform with regard to relevant reports is assessed at least once a year as part of the review of the management system. Business partners, the respective employees, other stakeholders, and rights holders in general are encouraged by the Business Partner Code of Conduct to report complaints via the Continental Integrity Hotline and Integrity Platform. The Business Partner Code of Conduct contains

a link to the Continental Integrity Hotline and Integrity Platform and is publicly accessible online. Continental protects persons who provide information and does not tolerate any retaliatory measures that could be directed against these persons. The procedural steps are explained in the rules of procedure. Receipt of a complaint will be confirmed and a discussion of the matter with the whistleblower on matters relating to the RVC Commitments is planned. Feedback is sent no later than three months after receipt of the notification has been confirmed.

In addition to the complaints procedure, further sources are used to investigate suspected cases of potential violations of protection rights and, if necessary, to implement preventative and corrective measures.

## Reviews of effectiveness

As part of the annual system monitoring, the human rights officer of Continental reviews the appropriateness and effectiveness of the management system. This review is based, among other things, on the relevant assessments within the business areas as well as on the assessment of the individual elements of the system by This statement was approved by the principal governing body (as defined in the *Modern Slavery Act 2018* (Cth)) ('the Act') of each of the Reporting Entities listed in the Annexure.

This modern slavery statement is signed by a responsible member (as defined in the Act) of each of the Reporting Entities listed in the Annexure.



David Stone, Director  
Veyance Technologies Australia Pty Ltd



David Stone, Director  
ContiTech Australia Pty Ltd



Ben Wood, Director  
Vulcanite Holdings Pty Ltd



Ben Wood, Director  
Vulcanite Pty Ltd

human rights officer. The management system is designed as a learning system that is developed on an ongoing basis. This also includes experience from membership in relevant associations and platforms, participation in multi-stakeholder dialogue formats.

## Documentation, reporting and dialogue

The implementation of the management system is coordinated with relevant decision-makers, communicated, internally documented, and archived. External reporting on a responsible value chain and the implementation of our due diligence obligations is part of sustainability reporting and other reporting formats including this one.

## Annexure - Reporting Entities

Continental AG subsidiaries subject to this reporting in Australia:

- > Veyance Technologies Australia Pty Ltd ACN 125 188 070
- > ContiTech Australia Pty Ltd ACN 000 468 780
- > Vulcanite Holdings Pty Ltd ACN 152 620 196
- > Vulcanite Pty Ltd ACN 000 055 069