DAIMLER TRUCK

Financial Services



DTFSAU MODERN SLAVERY STATEMENT 2024

Date: 30 June 2025

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A message from DTFSAu

Daimler Truck Financial Services Australia Pty Ltd ACN 651 056 825 ("DTFSAu") is pleased to provide our second statement under the *Modern Slavery Act* 2018 (Cth) ("Act") in recognition of the global concern about Modern Slavery in supply chains.

DTFSAu is an Australian incorporated private entity part of the global Daimler Truck Group of Companies ("Daimler Truck Group") and as part of this there are various local and global initiatives which assist in identifying, monitoring, managing and reporting Modern Slavery. DTFSAu and the Daimler Truck Group recognise that Modern Slavery cannot be eradicated immediately, but are and remain committed to observing human rights obligations and the general objectives of the Act. DTFSAu continues to take a continuous improvement and enhancement approach to our systems and processes to identifying, monitoring, managing and reporting Modern Slavery. This means we continue to make improvements and enhancements each year and also identify potential future topics that are then reviewed for potential implementation in the future year.

People first is one of our core convictions. We aim to ensure that fundamental human rights are respected in our own business as well as by our authorised dealerships and our suppliers.

This statement has been approved by the DTFSAu Board of Management being the principal governing body of DTFSAu.

Craig Cubitt

Managing Director & CEO

Daimler Truck Financial Services Australia Pty Ltd

Section 1. Introduction

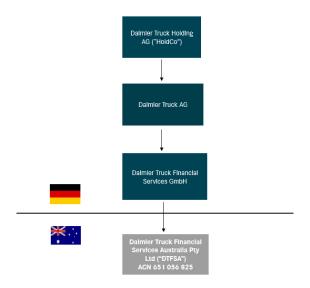
This Modern Slavery statement covers DTFSAu's activities over the reporting period of 1 January 2024 to 31 December 2024 and also outlines some of our priorities for the future. It has been prepared to comply with the requirements of the Act in order to meet the mandatory criteria as outlined in the Australian Border Force publication *Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities.*

DTFSAu has been operating since December 2021. DTFSAu is a captive commercial finance company and provides a range of commercial finance products primarily relating to commercial vehicles. Our customers include dealer/wholesale, corporate fleets and retail customers.

DTFSAu is an Australian incorporated private entity part of the worldwide Daimler Truck Group, with its ultimate parent company being Daimler Truck Holding AG based in Leinfelden-Echterdingen, Germany and listed on the German stock exchange. Daimler Truck Australia Pacific Pty Ltd (DTAuP) is also an Australian incorporated private entity and is part of the worldwide Daimler Truck Group and issues its own separate Modern Slavery statement.

An overview of our corporate structure is available below. In relation to mandatory reporting criteria 6 and as noted under section 6 of this Modern Slavery Statement, DTFSAu does not own or control any other entities other than DTFSAu and therefore this criterion is not applicable.

OVERVIEW OF STRUCTURE



DTFSAu EMPLOYEE OVERVIEW IN AUSTRALIA

Location	Number of employees
Mulgrave Head Office	65 (As of 31.12.2024)

DEFINING MODERN SLAVERY

For the purposes of this statement the term "Modern Slavery" is used to describe the most serious forms of exploitation and encapsulates, including but not limited to:

- Child slavery includes child trafficking, child soldiers, child marriage and child domestic slavery. Child slavery is often confused with child labour. Whilst child labour is harmful for children and hinders their education and development, child slavery occurs when a child is exploited for someone else's gain.
- Debt bondage occurs when people borrow money they cannot repay and are required to
 work to pay off the debt. This causes people to lose control over the conditions of both their
 employment and the debt.
- **Descent-based slavery** occurs when people are born into slavery because their ancestors were captured and enslaved and therefore, they remain in slavery by virtue of descent.
- **Domestic servitude** when employees work in private homes and are forced or coerced into serving and/or fraudulently convinced that they have no option to leave.
- Forced and early marriage when someone is married against their will and cannot leave the marriage. Child marriages can be considered a form of slavery.
- **Forced labour** involves any work or services which people are forced to do against their will under the threat of some form of punishment.
- **Human trafficking** involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion.
- **Sex trafficking** involves people, including children, being forced into the commercial sex industry and held against their will by force, fraud or coercion.

As a result of Modern Slavery, there are an estimated...

49.6 MILLION PEOPLE enslaved around the world,

with 27.6 million people in forced labour.1

In the 2023-24 financial year, the Australian Federal Police received ...

382 reports of modern slavery and human trafficking in Australia.

An increase of 42 reports compared to the prior financial year.²

Globally, it is Daimler Truck's goal to enhance transparency to its supply chains. This presents a great challenge, as transparency cannot be achieved automatically. For this reason, experts from various specialist departments at a global level, such as Procurement & Supplier Quality, Legal, & Compliance

¹ Information sourced from https://www.walkfree.org/projects/global-estimates-of-modern-slavery/ on 9 January 2025.

² Based on AFP report dated 30 July 2024, available at: https://afp.gov.au/news-centre/media-release/world-day-against-trafficking-persons-12-cent-increase-reports-human.

and Group Sustainability Management work closely together to progress the topic from a variety of perspectives. This strategy, both globally and locally, steers us in a positive direction with the aim of minimising human rights violations in our supply chains.

This statement outlines the measures we have taken in 2024 to strengthen our local policies and procedures to ensure we play our part in the detection and mitigation of Modern Slavery risks within our supply chains.

Section 2. Overview of Supply Chain

DTFSAu is committed to upholding respect for human rights. DTFSAu endeavours to ensure these fundamental rights are respected and measures are implemented to address Modern Slavery both within its own business and throughout its supply chain.

As outlined earlier, DTFSAu is a captive commercial finance company and offers commercial financing and leasing solutions and ancillary solutions to commercial customers (dealer/wholesale, corporate fleet and retail customers). DTFSAu uses an authorised dealership model whereby each authorised dealership must have at least one Daimler Truck franchise and relevant agreements are signed by our authorised dealerships.

DTFSAu sources goods and services from suppliers located both domestically and overseas. DTFSAu follows the Daimler Truck global procurement policy when sourcing goods and services.

These suppliers play an essential role to DTFSAu internal operations as they help support the relevant business units to deliver our product offering. Examples of some of the suppliers we use (but not limited to) include: information technology providers, marketing agencies, mercantile agents, credit reporting agencies, government departments etc.

OVERVIEW OF OPERATIONS - DTFSAU BUSINESS UNITS



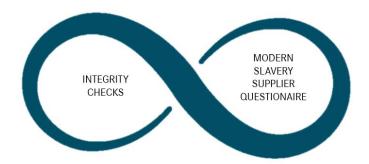
Section 3. Identifying Potential Risks in Our Supply Chains

DTFSAu have not identified any severe risk of Modern Slavery in our local supply chains. Generally, there is a low risk in relation to our direct products offered (given that DTFSAu is a captive commercial finance company and offer various commercial financing, leasing and ancillary solutions). However, there could be risks in relation to procurement use of wider goods such as clothing, food, and electronics. Generally, DTFSAu does not engage in a large scale of procurement and most of its suppliers are longer standing who we have ongoing relationships and agreements with.

Below is a snapshot of some potential risks we consider may be associated to our broader supply chain:

Risk	Description
Raw materials	Range of raw materials for example in relation to clothing which may have a heightened risk of Modern Slavery, such as child labour and debt bondage.
Lack of visibility	We recognise we have decreased visibility over contracted and subcontracted labour and third-party manufacturing, which increases the risk of Modern Slavery, such as forced labour.
Labour exploitation	Although not direct risks, we are aware and recognise the risks of labour exploitation in various sectors e.g. clothing sector.

Locally, DTFSAu continually aims to identify potential risks of Modern Slavery within its immediate supply chain. As part of this process, DTFSAu's suppliers go through various due diligence processes, outlined below:



Check Against Sanctions check on Suppliers

As a part of our compulsory pre-screening process, DTFSAu conducts a check on suppliers to ensure they are not listed on any international sanctions lists. If there are any concerns raised by the integrity check, these are escalated to our Legal and Compliance team, who will decide on a case-by-case basis in conjunction with Senior Management and/or our Internal Controls Committee, depending on mitigating factors, whether or not to engage with the prospective supplier.

Annual Modern Slavery Supplier Questionnaire

DTFSAu requests its active suppliers to complete the Modern Slavery Supplier Questionnaire ("Questionnaire") annually to ensure DTFSAu are continually able to identify and assess potential Modern Slavery risks within its supply chain.

The Questionnaire asks a variety of questions including whether the supplier is required to submit a Modern Slavery Statement, whether the supplier is aware of any general or specific modern slavery risks in its operations or supply chains and any actions taken to address such risks. All responses are reviewed by the Legal team. If needed the Legal team can escalate any supplier responses for discussion with the Local Compliance Officer and/or the Internal Controls Committee for consideration of next steps e.g. whether further questions should be raised with the supplier, further steps taken or whether engagement with the supplier can continue.

In 2024, DTFSAu sent the Questionnaire to a total of 180 active suppliers. There were a total of 41 responses which were reviewed by the Legal team which is an increase compared to 2023 (25 responses in 2023). There were no substantive concerns arising and there was no need for further escalation from the Legal team. Suppliers shared some of the measures they have in place, for example having their own modern slavery policies and reporting channels; using only Australian suppliers, contractual compliance clauses, training; supplier codes of conduct and supplier vetting processes (including risk classification of suppliers), active monitoring or auditing of supply chains where needed etc. There was 1 supplier that shared that they were aware of specific modern slavery risks and this response was reviewed in more detail. This supplier outlined how they assessed supplier modern slavery risk by way of specific framework to assign a risk rating to their suppliers which determines what further checks and mitigants are required.

In addition, in 2024, DTFSAu also issued a communication to our authorised dealer network with some reminders about human rights compliance, sharing resources and advising of the communication channel to DTFSAu if they become aware of general or specific risks of modern slavery. No notifications of general or specific risks were received by the Legal team.

DTFSAu previously sent a supplier questionnaire in 2022 and 2023. It is currently exploring moving to an annual declaration for the 2025 year to make it easier to complete and see if this will also increase response rates. It is also currently exploring whether it should adjust the scope of the supplier recipients to increase the response rate (see also section 7 below).

Internal Controls Committee

DTFSAu's Internal Controls Committee is the relevant body that looks at a wide variety of risk, governance and compliance topics and includes all of DTFSAu Executive Committee (which includes all directors of DTFSAu), the Local Compliance Officer for DTFSAu as well as various members of management. Modern Slavery formed a formal standing item in the regular meetings starting from Q2 2024, although compliance, governance and risk topics have been a part of this meeting prior to this date.

Other initiatives

Globally, the Daimler Truck Group values and is committed to respect for human rights. Below are a number of initiatives that have been implemented across the Daimler Truck Group:

(1) Human Rights Compliance Management System (HRCMS)

This system applies to all Daimler Truck Group companies, majority shareholders and its supply chains. It allows for risk-based and systematic assessments of the fulfillment of human due diligence obligations within the Daimler Truck Group and its supply chains and is based on requirements of applicable laws and internationally recognised standards such as the UN Guiding Principles on Business and Human Rights. It includes risk analyses, the implementation of preventative and remedial measures as well as continuous development and monitoring. Special measures e.g. include mandatory training on human rights for relevant functions designed to mitigate the risks of human rights violations. This is an annual completed for **DTFSAu** 2024. process and was https://www.daimlertruck.com/en/sustainability/social/human-rights-compliancemanagement-system for further information.

(2) Human Rights Compliance Training

This training was sent to all active employees of the administration of Daimler Truck AG and controlled Daimler Truck Group companies in the areas of Purchasing, HR, Communication, and Legal & Compliance (e.g. Legal & Compliance Officers (LCOs)), and the CEOs of the local entities. In addition, in 2024, DTFSAu selected a number of further local managers to complete the training including Finance and IT. The training provides information about human rights in general, the possible risks for human rights violations, and the relevance of human rights at Daimler Truck. This online training is sent to the target employee group every three (3) years and is mandatory to complete within sixty (60) days of receipt.

(3) Compliance Awareness modules

- *DTFSAu staff* Web-based compulsory modules are issued to DTFSAu staff as part of annual training requirements and aim to develop awareness about various compliance relevant topics such as data compliance, fair competition and consumer protection, and anti-bribery, fraud and corruption prevention.
- Authorised business managers at dealerships Web-based compulsory modules are issued by DTFSAu to the authorised business managers at dealerships as part of initial onboarding and then annual training/accreditation requirements which aim to develop awareness about various compliance relevant topics such as data compliance, fair competition and consumer protection, and anti-bribery, fraud and corruption prevention. In addition, there is another web-based module available for dealerships on similar topics issued by the Daimler Truck Group. In addition, in early December 2024 a communication was issued to our authorised dealer network with some reminders about human rights compliance, sharing various resources (including our Daimler Truck Code of Conduct, Business Partner Standards and a link to the Compliance Awareness module) and advising of the communication channel to DTFSAu if they become aware of general or specific risks of modern slavery as well as resharing the details of our SpeakUp Whistleblowing platform.
- Suppliers the Daimler Truck Group also makes a Compliance Awareness module available to its Suppliers via its Business Partner Standards. The Business Partner standards are incorporated into all its supplier agreements and purchase order terms and conditions.

(4) Human Rights & Public Law department

The Human Rights and Public Law department is responsible for developing and managing group-wide activities to fulfil human rights due diligence obligations. With a focus on continuous improvement, the department works closely with the HR and Purchasing departments who are responsible for the operational implementation of human rights due diligence obligations within the supply chain.

(5) Code of Conduct

The Daimler Truck Group's values and principles are anchored in an overarching Daimler Truck Code of Conduct which provides all Daimler Truck Group employees with guidance on how the Daimler Truck Group expects all employees to conduct themselves on a daily basis. It also includes information about the Daimler Truck Group's commitment to human rights and raises general awareness of the corresponding risks. Web-based training on the Code of Conduct is assigned to all administrative staff every three years, with any new employees automatically assigned the training upon commencement. The Code of Conduct is available to view at: https://www.daimlertruck.com/en/company/compliance/daimler-truck-code-of-conduct.

(6) Declaration of Principles on Social Responsibility and Human Rights at Daimler Truck (Declaration of Principles)

To achieve our common goals, we at Daimler Truck, our General Works Council, the World Employee Committee of Daimler Truck and the IndustriALL Global Union have agreed on this Declaration of Principles. It describes our approach and our processes to respect and support human rights at Daimler Truck. The Declaration of Principles supplements our commitment to human rights in our Daimler Truck Code of Conduct (link available here https://www.daimlertruck.com/en/company/compliance/daimler-truck-code-of-conduct) and forms the basis for how we realize our social responsibility.

Our Declaration of Principles is available to view at: https://www.daimlertruck.com/en/sustainability/s-social/human-rights/declaration-of-principles

(7) UN Global Compact

The Daimler Truck Group continues to participate in the United Nations (UN) Global Compact and is committed to the UN Guiding Principles for Business and Human Rights. We place particular importance on the International Bill of Human Rights as well as the core labour standards of the International Labor Organization (ILO).

(8) Agreements with our Suppliers and Authorised dealerships with key compliance obligations

DTFSAu has relevant Modern Slavery and human rights compliance relevant clauses in its supplier agreements (outlined in more detail in section 4). In terms of DTFSAu's authorised dealerships, relevant compliance contractual clauses are also present in our agreements with our authorised dealers.

Both locally and globally, there is a continual expansion and improvements to the due diligence processes to respect human rights, and ensure potential risks of Modern Slavery are identified within our supply chains.

Section 4. Actions taken to Assess and Address Potential and Identified Risks

DTFSAu has implemented the following processes, policies and practices to assess and address any potential and identified Modern Slavery risks.

PROCUREMENT

DTFSAu has locally enacted the Daimler Truck Group global procurement policy which DTFSAu follows for its local purchasing activities from Suppliers. Different categories of purchases are defined under the policy with different requirements that the purchasing department must adhere to e.g. the requirement to get a number of supplier quotes for certain types of purchases. After going through the policy defined procurement process and after a supplier passes the sanctions check mentioned in Section 3 above, they are issued with relevant materials as follows:

- Ongoing suppliers to DTFSAu are issued with a Supplier Agreement and in addition generally receive Purchase Orders for the relevant engagements under the Supplier Agreement. Each Purchase Order is also subject to our General Purchasing Terms and Conditions (including the Daimler Truck Business Partner Standards).
- One off or ad hoc suppliers to DTFSAu are issued with a Purchase Order for relevant engagements. Each Purchase Order is subject to our General Purchasing Terms and Conditions (including the Daimler Truck Business Partner Standards).

These materials are continuously reviewed and updated to ensure they meet local legal requirements and also Daimler Truck Group compliance requirements which are communicated by the Daimler Truck Group to DTFSAu as required. More information on the Modern Slavery relevant protections in these materials are detailed below.

Whilst not applicable to the 2024 year, we note that we have further enhanced our procurement processes from 1 January 2025 as outlined in section 7 below.

Ongoing suppliers - Supplier Agreement

Ongoing suppliers are generally on an ongoing Supplier Agreement. Most of our ongoing suppliers would generally be on a Supplier Agreement on our December 2021 version which contains important clauses requiring a supplier not to engage in Modern Slavery and/or child and forced labour and a warranty from the Supplier that they:

- Will NOT ENGAGE IN MODERN SLAVERY in performing the services;
- DO NOT PROCURE GOODS OR SERVICES from organisations that engage in, or are reasonably believed to engage in, Modern Slavery;
- Will implement appropriate measures to CONTINUOUSLY IDENTIFY, ASSESS AND ADDRESS RISKS of Modern Slavery in their supply chains; and
- Will PROMPTLY NOTIFY US if they become aware of suspected or actual Modern Slavery in their supply chains, in which case they will TAKE ALL REASONABLE STEPS TO PROPERLY ASSESS AND ADDRESS the actual or suspected Modern Slavery to our reasonable satisfaction; and
- Will place SIMILAR CONTRACTUAL OBLIGATIONS on their own suppliers and subcontractors.

The Supplier Agreement also contains an ability for DTFSAu to audit the Supplier's compliance with the Supplier Agreement.

As mentioned, the Supplier Agreement document used for Suppliers is updated from time to time as required. It was updated in June 2023 and most recently in September 2024 and both the 2023 and the 2024 versions contain updates with further Daimler Truck Group compliance requirements on suppliers in terms of compliance with laws including in relation to human rights. Suppliers that fall due for renewal will also sign up to the to the variations made to the latest version.

General Purchasing Terms and Conditions

Suppliers are generally issued with purchase orders by DTFSAu for each purchase with standard Terms and Conditions that apply to the purchase. Our General Purchasing Terms and Conditions are also made available on our website and are updated from time to time as required (the current version is the August 2024 version, and the previous version is the April 2024 version). Our website contains a link to our current version (general-purchasing-terms-and-conditions---dtaup-and-dtfs-5aug24.pdf).

The General Purchasing Terms and Conditions contain a similar clause to the Supplier Agreement mentioned above requiring the supplier not to engage in Modern Slavery and/or child and forced labour along with the relevant warranties referred to above for our ongoing Supplier Agreements. In addition, DTFSAu has the ability to audit the Supplier's records in relation to the agreement.

Daimler Truck Business Partner Standards and Daimler Truck Special Terms

The General Purchasing Terms and Conditions incorporate the Daimler Truck Business Partner Standards (available at

https://www.daimlertruck.com/fileadmin/user_upload/dokumente/unternehmen/compliance/daimler-truck-business-partner-standards-april-2022.pdf) and the Daimler Truck Special Terms which our Suppliers must also adhere to. The Daimler Truck Business Partner Standards also incorporate a Compliance Awareness Module.

These standards/terms define the standards and criteria that suppliers must meet, including the prohibition of child labour and forced labour. Suppliers are required to share these requirements with their own employees, suppliers and subcontractors and ensure compliance with these requirements.

DTFSAu is also provided with audit rights to confirm a supplier's compliance with their Modern Slavery obligations.

DAIMLER TRUCK GROUP POLICIES & TRAINING

Daimler Truck Code of Conduct

The Code of Conduct ("Code") was was most recently updated in March 2025 and is available to view at

https://www.daimlertruck.com/fileadmin/user_upload/documents/company/compliance/Daimler-Truck-Code-of-Conduct-english.pdf.

The Code covers all laws and regulations related to our business as well as providing a guideline for corporate principles and behaviour. The Code includes guidelines on:

- respect for human rights;
- environmental protection;
- protection of personal data;
- maintaining appropriate relationships with government officials and suppliers;
- protection of company assets; and
- corporate social responsibility.

Whistleblowing Policy

The Whistleblower System as mandated by section 1317Al of the *Corporations Act 2001* (Cth) ("Corporations Act"), has a policy outlining the protections that will be afforded to employees, directors and/or suppliers who report serious wrongdoing at DTFSAu in accordance with Part 9.4AAA of the Corporations Act.

The Whistleblowing Policy supports employees and third parties reporting concerns regarding unethical or illegal conduct, including in relation to Modern Slavery.

Employees may elect to report violations to their manager or HR, or if they wish to remain anonymous, employees and external whistleblowers are able to report to via phone, email or online utilising the Daimler Truck SpeakUp whistleblowing platform ("SpeakUp") which can be accessed via the following link https://www.daimlertruck.com/en/company/compliance/whistleblowing-system-speakup.

After receipt of the report, the SpeakUp team conducts an initial risk-based assessment of the potential violation. For all high-risk reports to SpeakUp, an initial legal review of the report is carried out. If the review finds that the suspicions are substantiated, the case is assigned to the appropriate Daimler Truck investigative unit with specific orders to conduct an investigation into and report on the matter.

All staff training on the Code

Every DTFSAu employee must complete a compulsory e-Learning module on the Code (which includes a Human Rights chapter) once every three (3) years. In addition, every DTFSAu employee must sign a confirmation that they will comply with the Code before commencing their employment.

Further development of staff awareness

In around early-mid July 2024, a legal bites email was sent to all DTFSAu employees to raise awareness of modern slavery including what it is, the DTFSAu and Daimler Truck Group approach to human rights compliance, outlining some of the items we are doing and outlining the reporting process if a staff member because aware of a potential risk.

INTERNAL CONTROLS COMMITTEE

DTFSAu's Internal Controls Committee is the relevant body that looks at a wide variety of risk, governance and compliance topics and includes all of DTFSAu Executive Committee (which includes all directors of DTFSAu), the Local Compliance Officer for DTFSAu as well as various members of

management. A formal standing item on Modern Slavery was included from Q2 2024 onwards, , although compliance, governance and risk topics have been a part of this meeting prior to this date.

Section 5. How we assess the effectiveness of those actions taken

Two of the key ways we assess the effectiveness of our approach to mitigating the risks of Modern Slavery within our supply chains are outlined below.

HRCMS effectiveness testing of measures

Part of the HRCMS involves effectiveness testing of the human rights measures assigned to entities within the Daimler Truck Group. This effectiveness testing is completed annually across the Daimler Truck Group as part of the HRCMS. In 2024, DTFSAu was marked as fully implemented for its assigned measures.

Additional Modern Slavery Risk Reporting at a local level

Outside of the HRCMS process, if we are notified of a risk ad hoc or via the reviews of questionnaire responses received or via DTFSAu's Internal Controls Committee standing item on Modern Slavery, these would be escalated for discussion in the first instance between the DTFSAu General Counsel (Legal team) and the DTFSAu Local Compliance Officer. Where needed, the matter will then be further escalated to DTFSAu's Internal Controls Committee. So far, no risks have been reported.

Section 6. Process of consultation with entities owned or controlled by DTFSAu

DTFSAu does not own or control any other entities other than DTFSAu and therefore this criterion is not applicable. DTFSAu chose to consult with representatives of DTAuP (local Legal and Compliance team) and the Daimler Truck Group (the team at Human Rights & Public Law department at Daimler Truck AG) as part of its preparation process from an alignment perspective and because we are part of a global group.

Section 7. Our priorities for the future

Some of DTFSAu's priorities for the future include the following:

- continuing to look for internal staff, dealer, and supplier training opportunities for example employee lunch and learn or town hall sessions and revisiting new employee induction processes. Where appropriate, we will also see what Daimler Truck Group aspects we can include in these training opportunities;
- continuing our regular discussion on Modern Slavery management within our Internal Controls Committee;
- exploring potential changes to our annual supplier questionnaire to an annual declaration form and focussing the recipient list;
- effective from on or about 1 January 2025, DTFSAu has enhanced its current procurement process by moving procurement under the management of a dedicated procurement team who benefit not only from the global Daimler Truck procurement processes and network but also have extensive experience in procurement. This involved various updates to the procurement process which will be highlighted in the 2025 Modern Slavery Statement (if required to be published);
- completing the annual HRCMS for DTFSAu;
- reviewing other captive financier Modern Slavery statements on the public register from a continuous learning perspective reviewing and implementing further or updated Daimler Truck Group global initiatives;
- monitoring any potential legislative next steps following the Modern Slavery Act 3-year review. We note that the government only recently responded to the review in December 2024 and we are still awaiting next steps in terms of legislative reform.

These priorities and their status will continue to be discussed on a quarterly basis in our Internal Controls Committee meetings which may also result in further opportunities being identified.