

## Modern Slavery Statement 2024

This Statement is published in accordance with the Modern Slavery Act 2018 (Cth) (**Act**) and outlines the steps Inchcape Australia Limited and its group companies has taken to assess and address the risk of modern slavery in our business and supply chains during the financial year ending 31 December 2024. This is our fourth Modern Slavery statement under the Act.

### A. The reporting entities

As with our previous Modern Slavery statements, this is a single joint Statement and covers the following group entities:

- Inchcape Australia Limited (**IAL**);
- Subaru (Aust) Pty Ltd (**Subaru Australia**);
- Inchcape European Automotive Pty Ltd (**Peugeot Citroen Australia**);
- Trivett Automotive Retail Pty Ltd (**Trivett**);
- AutoNexus Pty Ltd (**ANX**);
- Partslane Pty Ltd (**PartsLane**);
- Inchcape Automotive Australia Pty Ltd (**Deepal**);
- Inchcape Automotive Distribution Australia Pty Ltd (Foton LCV & Foton Trucks, collectively **Foton**).

(collectively, **Inchcape Australia**)

### B. Structure, operations and supply chains

Our structure, operations, and supply chains have not materially changed in the last few years, other than the addition of Deepal and Foton in 2024. IAL is ultimately owned by Inchcape plc, a company domiciled in the United Kingdom and listed on the London Stock Exchange. IAL is the Australian parent of the Inchcape Australia group companies Subaru Australia, Peugeot Citroen Australia, Trivett, ANX, PartsLane, Deepal and Foton.

Inchcape Australia is a leading player in the automotive services sector operating in the distribution, retail and logistics markets.

The Inchcape Australia group operates the following businesses, with the following supply chain requirements:



| Main operations                                                                                                                                                                                                                                            | Supply chain requirements                                                                                                                                                                                                                                                                                                                                            |
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| IAL supports five businesses through 7 shared services functions, being: <ul style="list-style-type: none"><li>• Finance</li><li>• Human Resources</li><li>• Information Systems</li><li>• Legal &amp; Company Secretariat</li><li>• Procurement</li></ul> | IAL mainly purchases goods and services in the following categories:<br><b>Facilities management</b> - security, cleaning, office supplies, postage and couriers, waste management, catering, fire protection and furniture.<br><b>Finance, company secretarial &amp; legal services</b> - insurance, professional company secretarial, legal and financial support. |

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| <ul style="list-style-type: none"> <li>• Marketing &amp; PR</li> <li>• Property</li> </ul> | <p><b>Human Resources</b> - recruitment, training, employee and payroll services</p> <p><b>Information Technology</b> - hardware, software, telecommunications and network services.</p> <p><b>Marketing and PR</b> - advertising, media, creative services, print, public relations and marketing services.</p> <p><b>Operations</b> - call centres, freight, health and safety, workshop parts and consumables, warehousing and logistics.</p> <p><b>Property</b> - rent, signage, access goods and services, utilities, local authority payments and building services.</p> <p><b>Travel and Events</b> - travel management, local &amp; international transport, accommodation, parking, employee and customer events.</p> |
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**SUBARU**

*Confidence in Motion*

| Main operations                                                                                                                    | Supply chain requirements                                                                                                                          |
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| Subaru Australia is the exclusive Australian importer and distributor of new vehicles manufactured by Subaru Corporation of Japan. | Subaru Australia mainly purchase vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies. |

**PCA**

PEUGEOT CITROËN  
AUSTRALIA

| Main operations                                                                                                                                                                     | Supply chain requirements                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Peugeot Citroen Australia is the exclusive Australian importer and distributor of new Peugeot & is the parts distributor for Citroen vehicles manufactured by Groupe PSA of France. | Peugeot Citroen Australia mainly acquires vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies. |



| Main operations                                                                                                                                                                                                  | Supply chain requirements                                                                                                                                                                                                                                         |
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| Trivett operates an automotive retail business selling, servicing and financing new and used vehicles, with dealerships located in New South Wales, Victoria and Queensland. Some used motor vehicle dealerships | <p>Trivett mainly acquires the following goods and services:</p> <p><b>Operations</b> - vehicle cleaning, service, maintenance and repairs, vehicle logistics, workshop parts, consumables and customers gifts</p> <p><b>Facilities Management</b> - cleaning</p> |

|                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| are operated under the brand name 'Bravoauto'. | <p><b>Marketing and PR</b> - creative services, digital advertising and hosting services, local print and radio media</p> <p><b>Vehicles and Vehicle Parts</b> – new vehicles from its OEM or Distributor partners, including Subaru, Peugeot Citroen Australia, Mitsubishi Australia, Isuzu Ute Australia, Volkswagen Group Australia, FCA Australia and Kia Australia parts, MRO &amp; workshop consumables.</p> <p><b>Used Vehicles</b> – used vehicles are acquired from the owners of used motor vehicles.</p> |
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| Main operations                                                                                                                                                                                                                              | Supply chain requirements                                                                                                                                                                                                                                                                                                                                  |
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| ANX is a leading national operator in the automotive services industry providing fleet conversions, fleet refurbishment and maintenance, vehicle logistics, parts & vehicle warehousing and distribution, and inventory management services. | <p>ANX mainly acquires goods and services in the following areas:</p> <p><b>Finance and Legal</b> - insurance</p> <p><b>Human Resources</b> - temporary and contingent labour</p> <p><b>Operations</b> - freight, distribution and packaging materials, MRO consumables and services.</p> <p><b>Property</b> - property management rent and utilities.</p> |



| Main operations                                                                                                                                             | Supply chain requirements                                                                                                                                                                                                                                                                                                                                        |
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| PartsLane operates an Automotive Genuine Parts E-commerce platform in Australia, including warehousing and distribution, and inventory management services. | <p>PartsLane mainly acquires goods and services in the following areas:</p> <p><b>Finance and Legal</b> - insurance</p> <p><b>Human Resources</b> - temporary and contingent labour</p> <p><b>Operations</b> - freight, distribution and packaging materials, MRO consumables and services.</p> <p><b>Property</b> - property management rent and utilities.</p> |



| Main operations                                                                                                              | Supply chain requirements                                                                                                                |
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| Deepal is the exclusive Australian importer and distributor of new Deepal vehicles manufactured by Mobitech Co Ltd of China. | Deepal mainly acquires vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies. |



| Main operations                                                                                                                     | Supply chain requirements                                                                                                               |
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| Foton is the exclusive Australian importer and distributor of new Foton vehicles manufactured by Beiqi Foton Motor Co Ltd of China. | Foton mainly acquires vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies. |

### C. The risks of modern slavery practices in Inchcape's operations and supply chains

In the 2024 reporting period, Inchcape Australia continued to engage the suppliers to understand the inherent modern slavery risks in its operations and supply chains, by categorising the potential risks according to commodity group and evaluated its engagement with suppliers.

Every business entity within Inchcape Australia operates to a centralised governance framework. For all business entities located in Australia, Inchcape Australia is required to comply with all Australian industrial relations laws.

Inchcape Australia continued with its own risk analysis report as a key instrument for understanding the inherent risks within the business operations. The analysis concluded that the risk of modern slavery can be higher within operations where there may be larger and more complex supply chains which extend outside of Australian borders or operation processes that are outsourced through suppliers, yielding less visibility. Although most of Inchcape Australia's direct suppliers within Operations are Australian businesses, Inchcape Australia is aware that suppliers which the business procures for the ancillary services involving low skilled, low-wage services such as Cleaning, Labour Recruitment, Waste management and Security need closer monitoring. The report assessed that the ability to effect significant change is more attainable with suppliers in which Inchcape Australia directly purchases goods and services from.

As illustrated in Figure 1 below, the 2024 report identified the majority of Inchcape Australia's spend (Level 1 Commodities) and found that most Level 1 commodities pose low to moderate risk. This is primarily because 79% of the supply chain spend originates from Japan, where the production and labour occur, which the geographic risk of modern slavery is low (as per the Global Slavery Index).

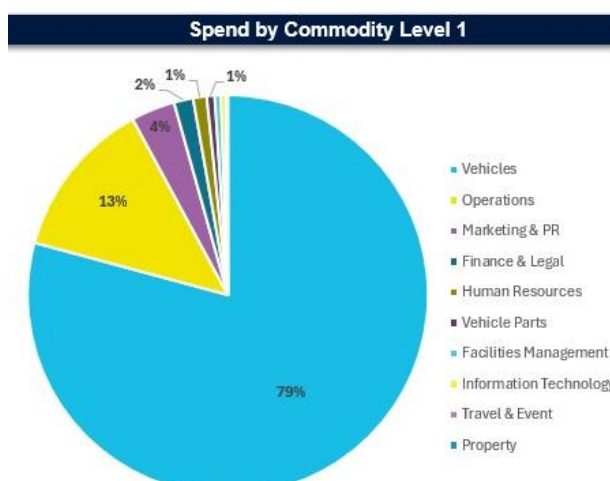


Figure 1 Spend by Commodity – Inchcape Australia

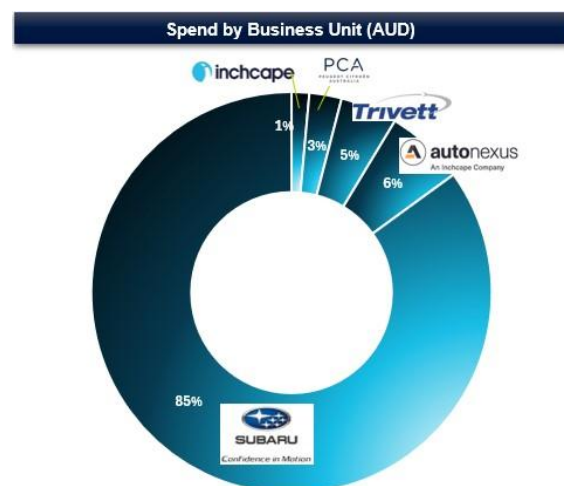


Figure 2 Spend by Business Unit (AUD)

Risks identified in the report were reviewed against the Global Slavery Index, which provides country and industry rankings developed by the Walk Free Foundation, the International Labour Organisation (ILO), and the International Organisation for Migration. The Risks related to the Global Slavery Index are assessed based on four standards:

- Social, Health and Economic Rights;
- Civil and Political Protections;
- Personal Security; and
- Refugees and Conflict.

In addition, risks identified in the report were tracked against The Dow Jones Sustainability Index:

- Industry Specific Criteria;
- Human Capital Development;
- Labour Practice Indicators;
- Corporate Citizenship; and
- Social Reporting.

As shown in Figure 2 above, Subaru Australia represents **85%** of the total spend across all business units. In Figure 3 below, within Subaru Australia, **90%** of its total expenditure is allocated to the purchase of new Subaru vehicles from the manufacturer. Furthermore, 79% of the total spend originates from the Level 1 Commodities in the “Vehicles” category (refer to Figure 1).

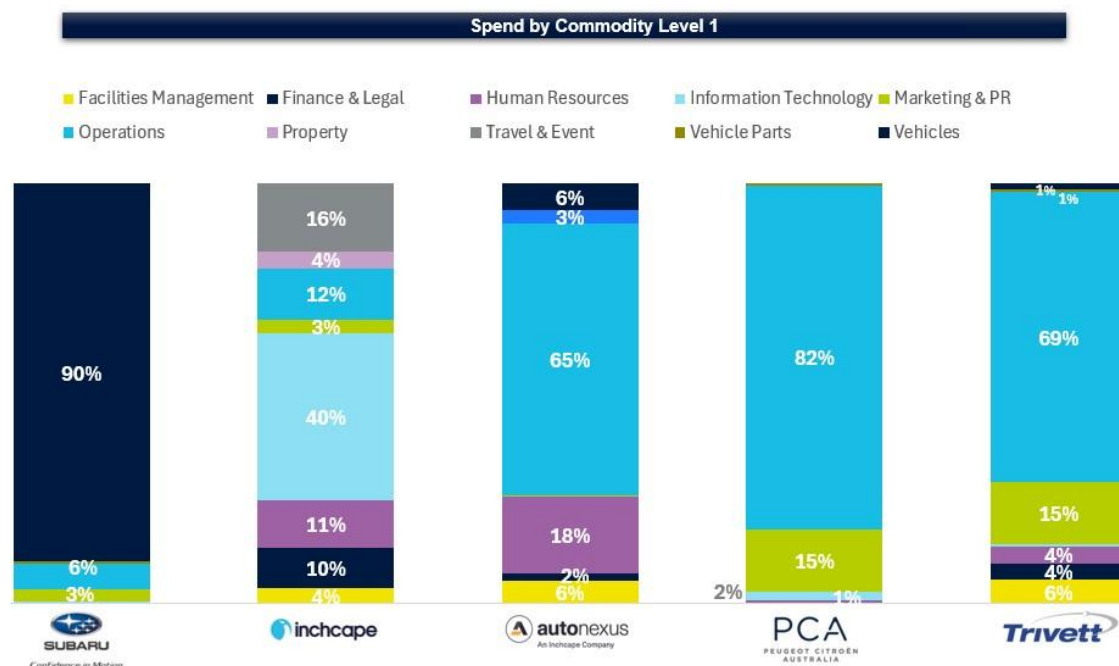


Figure 3 Spend by Commodity Level 1 - Business Unit

Overall, in 2024 Inchcape Australia’s view remained that the inherent risk of modern slavery in its operations and supply chain is low as most of the goods and services Inchcape Australia purchases continue to be from countries where the prevalence of modern slavery is considered to be quite low. As previously reported, products purchased from higher risk countries only account for approximately 1% of the products Inchcape Australia acquires.

**Note: Foton and Deepal are not represented in the above 2024 report figures and analysis as Inchcape Australia did not commence distribution of Foton and Deepal vehicles until the end of the reporting period.**

#### D. Actions taken to assess and address modern slavery risk

The Policies and Procedures that have been implemented by Inchcape Australia to Address, Assess and Mitigate Modern Slavery Risk throughout 2024 are outlined below:

| Policy or Procedure                                                                                | Purpose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>1. Conducting Due Diligence of our Suppliers through online due diligence software platform</b> | <p>During 2024, Inchcape partnered with a third-party supplier compliance management platform.</p> <p>A primary objective of this platform is to enable suppliers to demonstrate their adherence to modern slavery regulations. Additionally, the platform tracks suppliers' compliance with modern slavery, corporate policies and code of conduct standards. The platform stores essential supplier and contractor information, including their own Modern Slavery Statement and questionnaire related to their commitment to and acknowledgment of Inchcape's Code of Conduct for Suppliers.</p>                                                                                                                                                                                                                               |
| <b>2. Conducting Modern Slavery Training</b>                                                       | <p>Inchcape Australia implemented mandatory Modern Slavery Training to nominated staff involved in procurement of goods or services to ensure they are able to identify and manage the modern slavery risks.</p> <p>The training module is designed to raise awareness of what a modern slavery is, who the victims are, why it is relevant to the business, what the business is doing to address it, and what staff can do to manage the risks.</p> <p>The training included relevant case studies to give context to different forms of modern slavery and how they might occur in the workplace and supply chain. The training is also designed to address particular business operations where Inchcape Australia considers the most perceived risks lie.</p>                                                                |
| <b>3. Supplier Code of Conduct</b>                                                                 | <p>Inchcape Australia has conducted a comprehensive review of its Code of Conduct for Suppliers policy to ensure it aligns with the elevated expectations and the higher global awareness of modern slavery issues.</p> <p>Inchcape Australia's Code of Conduct policy is guided by international standards and guidelines. It has six key expectations that Inchcape Australia's suppliers acknowledge:</p> <ul style="list-style-type: none"> <li>• Human Rights and Labour Standard: Suppliers acknowledge that they ensure and protect against practices of modern slavery in the form of forced labour and that necessary steps have been taken to identify risk of modern slavery.</li> <li>• Business integrity: Requirement for all suppliers to comply with applicable laws in the market which they operate.</li> </ul> |

|                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|                                           | <ul style="list-style-type: none"> <li>• Freedom of Assembly: Suppliers are to acknowledge workers have the freedom to choose employment, and to respect the laws regarding freedom to form interest groups.</li> <li>• Whistle-blower Policy: Process and protections afforded to suppliers or any employees of Inchcape Australia, to raise concerns that they may have about suspected wrongdoing within the organisation.</li> <li>• Safety in Working Environment: Suppliers should seek to avert dangers to employees by means of preventative occupational safety measures.</li> <li>• Environmental Protection: Suppliers comply with applicable environmental standards and commit to principles of sustainable management as part of their corporate value.</li> </ul>                                                                                                       |
| <b>4. New Supplier On-boarding Policy</b> | <p>For new suppliers to Inchcape Australia, there is a supplier onboarding process where all suppliers are required to acknowledge the Inchcape Code of Conduct for Suppliers prior to any purchase orders being created through the digital ERP platform.</p> <p>Completing a signed form is mandatory, confirm all supplier information provided is true and correct and that you have read and agree to abide by</p> <ul style="list-style-type: none"> <li>• Code of Conduct for Suppliers</li> <li>• UK Bribery Act</li> <li>• Modern Slavery Act</li> </ul> <p>In particular, a declaration is also required from buyers who are onboarding new suppliers to understand the obligations as an employee when working with suppliers to engage in an anti-bribery zero tolerance approach, declare any conflicts of interest, and apply fair competition and anti-trust rules.</p> |
| <b>5. Contract Clauses</b>                | <p>In order to further mitigate risks with suppliers that are engaged by Inchcape Australia within the supply chain, a standard Modern Slavery contract clause is required in standard contract templates where the spend is over \$50k per annum. This is managed and overseen by the procurement team.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>6. Whistle-Blower Policy</b>           | <p>For situations where an anonymous report is preferred, employees are encouraged to use the confidential Whistleblowing Hotline hosted by a third-party hotline provider. Employees are encouraged to submit reports relating to violations stated in the Supplier Code of Conduct.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |



## E. Assessing the effectiveness of Inchcape's actions

Inchcape Australia continued its journey on modern slavery due diligence during the 2024 reporting period and will continue to review and assess the effectiveness of actions taken to address modern slavery, to determine whether they are effective or require further refinement or improvement.

The following steps were undertaken in assessing the effectiveness of our actions in the 2024 reporting period:

| Action                                                                                             | Assessment of Effectiveness                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Conducting Due Diligence of our Suppliers through Online due diligence software platform</b> | <p>With the implementation of an online third-party due diligence platform, Inchcape Australia is able to aggregate data submitted by suppliers to determine the level of Modern Slavery risk in relation to that supplier. This allows those risks to be identified, managed, and actioned by suppliers.</p> <p>Questionnaire criteria include mandatory fields as following:</p> <ul style="list-style-type: none"> <li>• Whether the business at the time of providing the data is required to produce a Modern Slavery Statement (Suppliers with annual consolidated revenue of at least \$100 million).</li> <li>• Or if they voluntarily produce the report without meeting the reporting threshold.</li> <li>• If not yet produced but required to under the reporting threshold, the expected date of development.</li> <li>• Copy of Modern Slavery Statement to be uploaded.</li> <li>• As summary, suppliers are to tick all fields that apply to them based on what is included in the company statement. If more fields are applied, their overall score will improve.</li> <li>• Corporate policies, management procedures or codes of conduct that have been developed and implemented to address the potential risk of modern slavery within their supply chain.</li> <li>• Copies of supporting evidence to be uploaded.</li> </ul> <p>With above mechanism in place Inchcape Australia is able to track the level of engaged suppliers who have completed the questionnaire, which is still ongoing to achieve improved completion rate.</p> |



|                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| <b>2. Conducting Modern Slavery Training</b> | <p>Inchcape Australia has a Modern Slavery training module delivered through a third-party training provider.</p> <p>The training module assesses whether staff can correctly identify indicators of potential victims and how to mitigate the risk of modern slavery in various context the staff may come cross. The module includes a test section assessing the understanding level of modern slavery risk (low / high) based on different scenario of goods and services procured.</p> <p>The business implements a mandatory pass rate of 80%.</p> <p>The training module is rolled out on an ad hoc basis to identified audiences when required.</p> |
| <b>3. Supplier Code of Conduct</b>           | <p>The Inchcape Code of Conduct for Suppliers has been shared with suppliers with an open line of communication between Inchcape and the supplier to discuss the approach.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>4. New Supplier On-boarding Policy</b>    | <p>An established process took place to review the actions Inchcape Australia has taken in the 2024 reporting period, including mandatory compliance fields new suppliers must complete before proceeding to the next step of the onboarding process can be triggered by the nominated Supplier Master Data team.</p>                                                                                                                                                                                                                                                                                                                                       |
| <b>5. Contract Clauses</b>                   | <p>Inchcape Australia during the reporting period of 2024, continued to prioritise due diligence in inherently higher risk ancillary service categories, including cleaning, contingent labour services and third-party services.</p> <p>All new contracts signed require 100% compliance.</p>                                                                                                                                                                                                                                                                                                                                                              |
| <b>6. Whistle-Blower Policy</b>              | <p>Through Inchcape Australia's Whistleblowing policy, no complaints were received regarding any potential modern slavery incidents.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

## F. Consultation with Inchcape's entities

Inchcape Australia has a Modern Slavery Project Team that works across all business units and functional departments. The Modern Slavery Project Team consults with key staff members of each business unit as required and regularly meets to provide updates.

## G. Other information

Inchcape Australia has no additional or other information to provide in respect of the reporting period of 2024.

### **Approval**

This Modern Slavery Statement was approved by the Board on 30 June 2025.

A handwritten signature in black ink, appearing to read 'BR', with a horizontal line underneath.

**Blair Read**  
Managing Director  
Inchcape Australia Limited