

**A commitment to
ethical sourcing
DRIVEN by good
practice**



2025 Modern Slavery Statement



Our commitment

Message from the Managing Director
Peter Woodward



The UN Guiding Principles are the recognised global standard for preventing and addressing business-related human rights harm. They provide a framework for businesses to identify, prevent, mitigate, and account for their human rights impacts, and guidance on how to enable remediation for impacts when they occur. At VDI, we are committed to respecting human rights across our operations, and to advancing meaningful societal action towards a number of Sustainable Development Goals (SDGs) including:

- Gender Equality (SDG 5)
- Decent Work and Economic Growth (SDG 8)
- Reduced Inequalities (SDG 10)

We recognise and commit to the continuum of involvement contained in the UN Guiding Principles, and recognise our responsibility to identify cause, contribution and links. Accordingly, we have implemented procedures to undertake human rights due diligence to identify, prevent, mitigate, and account for how we address our human rights impacts.

Our business and supply chain is widespread, which makes the challenges associated with safeguarding human rights significant and complex. Our plan highlights the steps we have implemented to help protect human rights in VDI's own operations and our supply chains. It reflects the challenges we continue to face as we work with reasonable steps to supporting a fair working environment for those who support our business. We remain committed to learning and continually improving our program.

Peter Woodward
Managing Director
Vehicle Dealers International Pty Ltd

Our structure and governance

Strong governance processes are essential for an effective modern slavery response. Our modern slavery strategy and response is integrated into our broader governance structure.

Vehicle Dealers International Pty Ltd (VDI) is an Australian private company that sells bus and coach products, including spare parts and vehicle servicing. VDI is the Australian distributor for Yutong Bus, and operates in Queensland, Western Australia, New South Wales, and Victoria.

VEHICLE DEALERS INTERATIONAL PTY LTD
ABN 50 611 179 447

VDI Board

Responsible for overseeing VDI's modern slavery strategy and response, and the Ethical Sourcing Program. Receives quarterly updates about human rights and modern slavery through reports and accompanying meetings.

Risk Committee

Responsible for overseeing VDI's Risk Management Standard and internal risk controls. This includes overseeing VDI's ethical sourcing performance, and overseeing the effectiveness of our ethical sourcing risk-management systems and processes (including in relation to modern slavery).

Senior Leadership Team

Responsible for overseeing execution of VDI's policies and strategies. This includes being responsible for the procurement of goods and services within their respective functions in accordance with VDI's Ethical Sourcing Policy.

Procurement Teams

They have the direct relationships with suppliers and are responsible for execution of the Ethical Sourcing Program.

DRIVEN by our values



At VDI, we are proud of the values we endorse and the value these bring to our organisation. We are proud to be **DRIVEN**, which recognises the synergy of our company values - dedication, responsibility, innovation, value, excellence and nurturing.

Our continued commitment to these values allows us to create a seamless and rewarding experience for our customers, whilst ensuring we deliver on our commitment to upholding the UN Guiding Principles and Sustainable Development Goals.

Our reasonable steps

We recognise our obligation to take reasonable steps to ensure the goods and services we procure are not the product of modern slavery, and that our operations are free from modern slavery practices. Our reasonable steps include commit, plan, source, manage, remedy, report and improve. Through these we prioritise risks to people, focusing our resources on the operational and procurement activities that represent the most significant modern slavery risks to people rather than volume spend or our influence on suppliers.



Commit	Plan	Source	Manage	Remedy	Report	Improve
<ul style="list-style-type: none"> •We commit to stakeholder engagement, risk assessment, the application of our Modern Slavery policy and plan, and training of our personnel. 	<ul style="list-style-type: none"> •Our plan includes identifying and mapping our operations and supply chain risks for each procurement and developing a risk reducing sourcing strategy. 	<ul style="list-style-type: none"> •We select appropriate suppliers and adopt a shared responsibility approach to contracting. 	<ul style="list-style-type: none"> •We monitor and evaluate our suppliers' performance and work to develop supplier capabilities. 	<ul style="list-style-type: none"> •We provide access to effective grievance mechanisms, take safe immediate steps to remedy harm, use leverage to remediate deficient practices and withdraw responsibly. 	<ul style="list-style-type: none"> •We operate a victim centred reporting protocol and report on our modern slavery risk management efforts. 	<ul style="list-style-type: none"> •We look to continuously improve by taking lessons from our Modern Slavery performance. •We provide training to our staff on Modern Slavery •We cooperate with the Anti-slavery Commissioner as required

Our operations

Our operations include procurement, business to business (B2B) sales, and service and parts support.

Procurement	Sales	Servicing Support	Parts
<ul style="list-style-type: none">• VDI purchases new vehicles exclusively from Yutong Australia Pty Ltd, an Australian private company. Yutong Australia Pty Ltd is a tier 1 supply to VDI.• VDI procures parts and services from Australian and overseas businesses (tier 1 suppliers) to support Australian assembly of Yutong vehicles.• VDI procures a range of parts and services from Australian businesses to support administration and operations functions.	<ul style="list-style-type: none">• VDI sells new Yutong vehicles to Australian dealerships and Australian government agencies and entities.	<ul style="list-style-type: none">• VDI supports the servicing of Yutong vehicles conducted by Australian dealerships through the provision of warranty and technical support.	<ul style="list-style-type: none">• VDI supports the ownership and operation of Yutong vehicles through the sale of spare parts to Australian dealerships.



Our team comprises 31 personnel located across Australia.

Our team

We consider that the nature and characteristics of our workforce mean that there is a low risk of modern slavery occurring in our operations. We also consider that the controls we have in place mitigate the residual risk that modern slavery could occur in this area.

Operating a retail, production and service delivery business entails a variety of complex tasks involving a diverse range of skills. Broadly, from a modern slavery risk perspective, there are two key team member cohorts. These include administration team members and workshop team members. We assessed the types of human rights harm that could occur in our operations. This process did not identify any risks of modern slavery for our operations. Our workshop cohort includes technicians, drivers and cleaners. Collectively these roles typically require physical stamina and are frequently engaged in tasks giving greater rise to health and safety risks. Administration team members include the senior leadership team, as well as members responsible for areas such as compliance and safety, finance, IT, human resources, procurement, marketing and sales. These roles require a different range of skills and have a higher proportion of office-based time. Neither of these cohorts involve young workers. We consider that our engagement of team members poses a low risk of modern slavery as we have undertaken steps to mitigate this risk. These include the high level of visibility we have over our team members' working conditions, which are regulated by Fair Work and Safe Work Australia; our direct employment of workers rather than through external contractors; our workers' access to accessible and confidential grievance frameworks; and our implementation of relevant legislative requirements, including in relation to workers' health and safety and remuneration. We also respect our team members' right to join or not join a union, and we aim to work closely with workers' representatives.

While we consider we have mitigated the potential risks of modern slavery in our operations, we continue to focus on our team members' working conditions and wellbeing. We maintain a focus on providing a safe and respectful environment and providing team members with decent work.

TEAM MEMBER ENGAGEMENT

We empower our team members to contribute. All employees are provided the opportunity to communicate with leaders of the business, offer suggestions or ideas, and provide feedback on what's working well and where the opportunities lie across the business.

POLICY

We develop and implement policies which outline the requirements expected of team members and the way they behave.

RISK MANAGEMENT STANDARD

Our Risk Management Standard is regularly reviewed. This helps ensure we monitor changes in risk and establish controls and activities required for ongoing improvements, including in relation to our team members.



Continuous care and fair treatment for our team

GRIEVANCE MANAGEMENT

Our grievance management framework includes accessible and confidential grievance mechanisms partnered with appropriate remediation procedures.

REGULATORY COMPLIANCE

We comply with legislation to protect our team members' health, wellbeing and remuneration. This includes assessing and addressing changes which may negatively impact team members' human rights on an ongoing basis. We also respect our team members' rights to freedom of association and collective bargaining.

HR COMPLIANCE TEAM

Our dedicated human resources and compliance team is responsible for ensuring team members have the tools, processes, policies and frameworks to ensure compliance.

What we source

We work closely with our suppliers to communicate our expectations and manage potential modern slavery and broader ethical sourcing risks. We broadly define our supply chain in two categories – goods for resale (GFR) and goods not for resale (GNFR). These two categories then have a variety of tiers. We define tier one suppliers as those suppliers who have a direct contractual relationship with VDI. Tier two suppliers provide either products, processes or services to the tier one suppliers to meet their contractual commitments.

Managing our supply chain across both these categories and across all tiers is complex. Our supply chain has a global footprint. This may be affected by a range of external factors, such as geopolitical issues affecting existing trade routes or risk rating changes to raw materials following political decisions in sourcing countries. We also rely on a wide range of services to support our operations, including transport, IT services and digital marketing. The size, capacity and locations of our suppliers and their sub-suppliers can differ significantly. For example, our servicing department supply chain includes small family-owned businesses in Australia to large multi-national companies. Working across our supplier base to manage modern slavery and broader human rights risks means we need to understand how modern slavery can occur in a wide range of sectors, circumstances, and countries and take a tailored, context-specific approach.

Goods for resale We procure bus and coach vehicles and OEM parts from Yutong Bus Australia Pty.

New Vehicles	Parts
Yutong buses and coaches, both CBU (completely built up) and DKD (driveable knock down)	Yutong OEM parts

Goods not for resale We procure a range of goods and services not for resale from over 1000 direct suppliers. Goods not for resale encompass non-tradeable goods and services we procure to support our operations.

Operations	Marketing	Supply Chain	Capital	Technology
Consumables, personal protective equipment, contractor services	Marketing, digital and print media services, uniforms, promotional material	Transport services	Assets, equipment, tooling	Hardware, technology services

Our supply chains

The schematic below describes three products and their journey from raw materials to VDI, demonstrating various tiers and the potential number of businesses engaged to create and deliver products for our customers to purchase. There are also supplementary processes related to delivering these products such as the manufacturing of packaging.

Product quality is prioritised in our supply chain and operations, and we maintain rigorous supplier requirements. Services can range from professional consultants for projects and marketing to contractors that provide installation services. Compliance with our Supplier Code of Conduct is a condition of trade for direct suppliers regardless of their geographic location or the product or service provided.



Stakeholder Engagement

Building a strong relationship with suppliers and other stakeholders begins with meaningful engagement.

What we consider	What we do
Two-way engagement	We advocate that our organisation and our stakeholders can freely express opinions, share perspectives and listen to alternative viewpoints to reach a mutual understanding. We encourage stakeholders to take an active role in designing and carrying out engagement activities.
Engagement in good faith	We engage with our genuine intention to understand how our relevant stakeholders' interests are affected by our activities. We are prepared to address adverse impacts that we cause or contribute to. We expect stakeholders to honestly represent their interests, intentions and concerns.
Safe engagement	We consider the safety and well being of vulnerable stakeholders. When necessary, we engage workers through trusted intermediaries. If engaging survivors of modern slavery and people with lived experience, we adopt sensitive practices and provide support from staff trained in Mental Health First Aid.
Responsive engagement	We seek to inform our decisions by eliciting the views of those likely to be impacted by decisions. We follow up to evaluate the effectiveness of actions, considering any adverse impacts to impacted and/or potentially impacted stakeholders.
Ongoing engagement	We commit to continuing engagement through the lifecycle of an activity.
Equitable engagement	We engage in ways that accommodate the needs of stakeholders to facilitate effective engagement. We consider education and literacy, physical impairments and cultural sensitivities.

Identifying our modern slavery risks

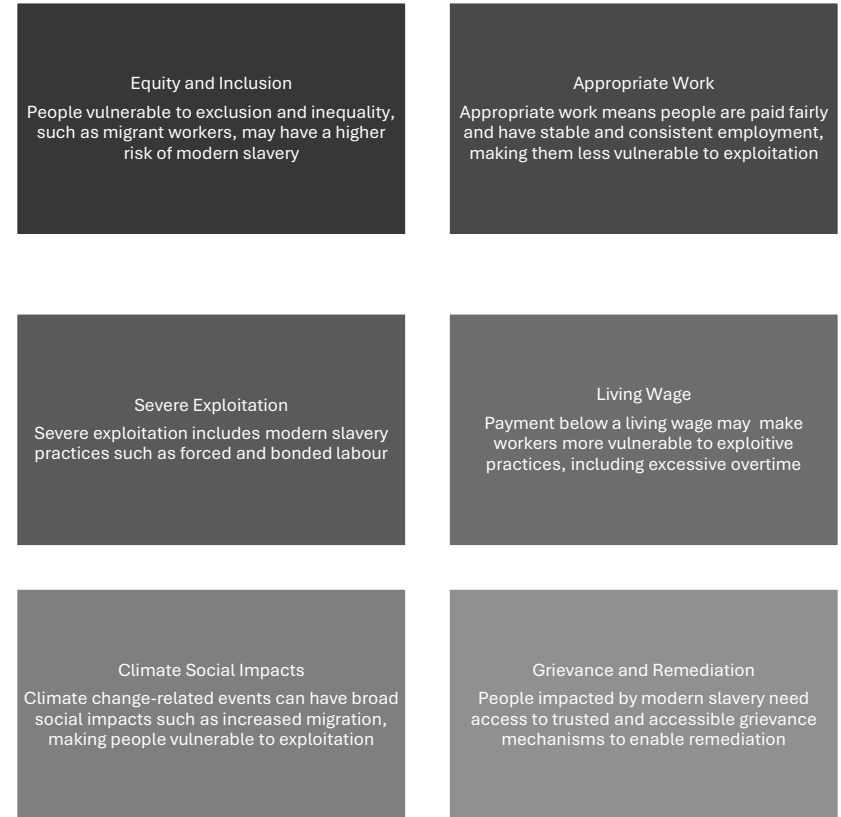
Our work to identify our modern slavery risks is integrated in our broader human rights risk management approach.

Taking an integrated approach

Human rights harm such as modern slavery does not usually happen in isolation. Modern slavery may be closely linked to other types of human rights harm, such as discrimination, physical and other forms of violence, and lack of access to effective grievance mechanisms. A person's vulnerability to modern slavery can also be affected by external factors that undermine their human rights, such as conflict. More broadly, the factors that can drive modern slavery, such as the complexity of global supply chains, can also facilitate other human rights harms, such as exposure to dangerous working conditions or environmental damage. The interconnected relationship between modern slavery and other forms of harm means that actions to identify and manage modern slavery risks can be most effective when they are integrated with broader work to respect human rights. Taking a holistic approach supports us in identifying systemic root causes and implementing solutions that address interrelated problems.

Identifying our salient human rights issues

Our operations and supply chain present the greatest risk of breach of salient human rights issues that could contribute to the most severe harm to people. These include 'severe exploitation' (including modern slavery), 'decent work' and 'living wage'. They also include other issues closely connected to vulnerability to modern slavery, such as 'grievance and remedy'.



The salient issues where the most severe impacts on people may exist.

Assessing our modern slavery risks

By building a strong understanding of our modern slavery risks and how they may be evolving over time, we can target our risk management to focus on the areas of greatest risk to people. Our salient human rights assessment has further enhanced our understanding of our modern slavery risks across our operations and supply chain. We also take additional steps to understand and track our modern slavery risks across our supply chains. The table below explains how we work to identify and assess our modern slavery risks

<p>We consider how a wide range of risk factors could shape our modern slavery risk profile.</p>	<p>Modern slavery risk factors</p> <ul style="list-style-type: none"> • High levels of subcontracting • Links to high-risk geographies • Complex and fast-moving supply chains • Reliance on temporary or migrant workers • Absence of grievance mechanisms • Dangerous/substandard living or working conditions • Isolation of workers • Retention of identity documents • Use of third-party recruitment • Reliance on lower skilled labour • Unreasonable restrictions on workers' movements 		
<p>We assess these risk factors through standalone assessments, as well as ongoing monitoring using other labour rights risk tools.</p>	<p>SALIENT HUMAN RIGHTS ASSESSMENT Assessed all types of human rights harm (including modern slavery) that could occur in our operations and value chain</p>		<p>OTHER LABOUR RIGHTS RISK TOOLS Help to inform our understanding of modern slavery and labour rights risks in our supply chains. These include worker voice feedback, grievance mechanism complaints, public reporting on key issues, and information from tools such as Fair Supply.</p>
<p>In line with the UNGPs, we evaluate whether we could cause or contribute to identified risks or whether we are directly linked to these risks through our business relationships.</p>	<p>Cause A business may cause modern slavery or other human rights harm where its actions directly result in modern slavery occurring.</p>	<p>Contribute A business may contribute to modern slavery or other human rights harm where its actions or omissions facilitate or incentivise modern slavery.</p>	<p>Directly linked A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in businesses' extended supply chain.</p>
<p>The results of the three stages above help us to understand and manage our modern slavery risk profile.</p> <p>OUR MODERN SLAVERY RISK PROFILE Understanding our risks and how they are evolving supports us to target our risk management actions</p>			

Assessing our supply chain modern slavery risks

Our assessment of modern slavery risks in our supply chain uses a risk-based approach



Risk Screening

Risk Screening

Although modern slavery can occur in any sector or in any country, there are several core characteristics that increase the risks of modern slavery. Before engaging a supplier or renewing an existing contract, procurement officers should consider the general risk profile of the procurement or the risk profile of the supplier relating to modern slavery compliance. Risk screening of a supplier involves identifying the broad operations and overall supply chain structure to identify the general sector and industry involved, the product(s) and/or service(s) required and/or provided, the geographic region where the production (labour) typically occurs, and the type of entity likely to be involved.

Review and Action

Review and Action

Generally, where a procurement has a high-risk rating for two or more categories, it should be considered high risk, and procurement personnel should factor this into the procurement documentation to try and address these risks in the early stages of procurement.

Modern Slavery Audit

Modern Slavery Audit

When a risk screening identifies a high risk, procurement personnel engage with the supplier to audit the supplier's policies and practices on modern slavery. This is used to assist in identifying risks in procurement, and to facilitate collaborative engagement with the supplier. In addition to direct supplier engagement, we assess risk factors through independent 3rd party compliance reports, grievance mechanism complaints, public reporting and information from tools such as Fair Supply.

How we address modern slavery risks

Our primary tool to address modern slavery risks is our Ethical Sourcing Program.



Our ethical sourcing program comprises our [Ethical Sourcing policy](#), [Procurement and Purchasing Procedure](#) and [Supplier Code of Conduct](#), and collectively forms a [risk-reducing sourcing strategy](#). The program helps us identify and address potential modern slavery risks before engaging suppliers and by assessing our engaged suppliers' compliance with our Supplier Code of Conduct.

Resources allocated to implementing the program

Overseen by the National Commercial and Procurement Manager and National Compliance and Systems Manager, our commitment to ethical sourcing is supported by our procurement team. Our procurement team comprises 8 personnel distributed nationally. This represents 8% of VDI's total workforce.

How our Ethical Sourcing Program works

Before engagement, all suppliers are subject to a risk screening that seeks to identify potential modern slavery risks based on sector and industry risks, product and services risks, geographic risks, and supply chain model risks. Suppliers that meet our threshold risk score are subject to further risk assessment questionnaires to help us understand the activities and potential ethical sourcing risks. These questionnaires includes an assessment of each supplier's inherent risk based on location, sector, and industry, as well as site-specific factors such as workforce composition, working hours, contractual arrangements, and recruitment costs.

Our modern slavery response

We focus on modern slavery risk management response in three key areas.

Focus Area	① Addressing known modern slavery risks	② Maintaining effective grievance mechanisms to enable the identification and remediation of modern slavery harm	③ Mitigating future modern slavery risks
What we Do	<ul style="list-style-type: none"> ✓ We take a proactive and tailored approach to addressing modern slavery risks 	<ul style="list-style-type: none"> ✓ We work to implement and maintain safe reporting channels for our staff and stakeholders to safely raise concerns about modern slavery. Where indications of modern slavery are identified, we investigate to verify the situation and support remediation in line with the UNGPs. ✓ We review the effectiveness of our grievance mechanisms on a periodic basis. 	<ul style="list-style-type: none"> ✓ We seek to mitigate modern slavery risks by taking a range of actions to reduce the potential of modern slavery risks increasing. ✓ We withdraw responsibly, and as a last resort, after failed attempts at preventing or mitigating severe impacts, when adverse impacts are irremediable, or when there is no reasonable prospect of change.
How we Do It	<ul style="list-style-type: none"> ✓ Our ethical sourcing policy is the foundation for our work in this area. It provides us with a framework for stakeholder engagement and risk assessment. 	<ul style="list-style-type: none"> ✓ We include modern slavery training, including our grievance mechanisms, as part of our onboarding program for new staff. ✓ We promote grievance mechanisms on our internal intranet. 	<ul style="list-style-type: none"> ✓ We implement a detailed policy framework, including our Ethical Sourcing policy and Supplier Code of Conduct, which are reviewed regularly and updated as required. We also provide training to our employees aimed at increasing their understanding and awareness of modern slavery risks and indicators.



How we inform and educate our personnel

Our ethical sourcing program relies on our personnel being informed and educated.



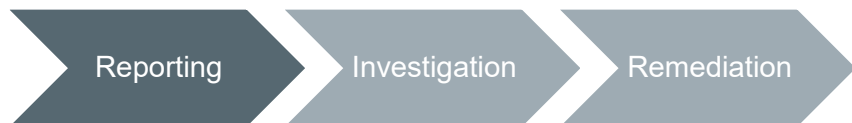
Induction and Onboarding

Overseen by the National Compliance and Systems Manager, our commitment to ethical sourcing starts from the moment our employees are onboarded. All personnel, irrespective of role, receive training on what constitutes modern slavery, where to seek additional information about modern slavery laws, and instruction on how to contact the Commonwealth Anti-Slavery Commissioner. All personnel are informed on how they can report any actual or suspected occurrence of modern slavery within VDI and its supply chain.

Procurement Roles

All personnel involved in the procurement process additionally receive training focused on further understanding and recognising modern slavery. Procurement personnel are required to complete internal e-Learning modules created by VDI, and external e-Learning modules offered by the Commonwealth government from their [modern slavery website](#). Training is refreshed annually to ensure education and understanding remains current.

Our approach to grievance management



Reporting Our grievance mechanisms are open to all potentially affected stakeholders, including past and present employees, customers, contractors, suppliers, workers of suppliers and affected communities. These stakeholders can safely report concerns relating to potential, suspected or actual occurrences of modern slavery using the following channels:

privacy@vdi australia.com.au	VDI CALLitOUT
<p>What: A confidential email service that allows concerns relating to modern slavery to be raised.</p>	<p>What: An anonymous online form submission to report concerns relating to modern slavery.</p>
<p>Open to: Employees past and present, suppliers, suppliers' workers, contractors, customers and affected communities with access to email.</p>	<p>Open to: Primarily current employees. However, anyone with access to the form link (shareable) can report via this channel.</p>
<p>Availability: 24 hours a day, 7 days a week</p>	<p>Availability: 24 hours a day, 7 days a week</p>

Investigation We assess and investigate complaints and seek to promote their timely resolution. We also seek to update complainants throughout the grievance process. If the complainant is dissatisfied with the outcome of a grievance process, they can refer the issue or complaint to the relevant National Contact Point.

Remediation Where we determine a remedy is necessary in line with the UN Guiding Principles on Business and Human Rights (UNGPs), this may be provided by VDI directly, or in collaboration with third parties. In situations where we identify we have not caused or contributed to human rights harm, such as modern slavery associated with our suppliers, we seek to work with suppliers to confirm that effective remedy is provided in line with governing legislation.

How we track the effectiveness of our actions

We define an ‘effective’ response to modern slavery as one that reduces the risk of vulnerability to exploitation by driving changes to behaviour and practices across our business and supply chain.

We want to ensure that the actions we take to manage our modern slavery risks work. This is why we take a range of steps to assess the effectiveness of our modern slavery response.

Component of our modern slavery response	How we assess our effectiveness
Policy and governance frameworks	We review key policies regularly to evaluate currency and suitability. We monitor the effective implementation of our policies and frameworks through quarterly reporting to management, which includes grievances raised and status of investigations conducted, changes to risk profile of suppliers and changes to the risk register.
Risk assessment process	We monitor our modern slavery risk profile continuously to ensure it is fit for purpose. We engage with suppliers to validate our understanding of modern slavery risks in our supply chain.
Training	We assess the effectiveness of the provided training by engaging with our employees to identify any knowledge gaps.
Grievance and remediation processes	We assess the effectiveness of our grievance mechanisms by reporting engagement, including stakeholder feedback and changes in reporting trends.

How we improve our response to modern slavery

Assessing the effectiveness of our modern slavery response is the foundation for improvement actions. We draw on information from our own internal reviews, grievance mechanisms and stakeholder engagement to inform the early identification and mitigation of risks to people and to continuously improve our due diligence processes.

What we consider	How we improve
The suitability of policies and the effectiveness of the implementation of policies and frameworks	We amend relevant policies to reflect changes to our business operations, our risk profile and supply chain. We adjust implementation and execution strategies for policies and frameworks to maximise stakeholder understanding, engagement and action.
Our modern slavery risk profile	We refine our modern slavery risk profile to reflect changes in risks in our supply chain.
The effectiveness of training provided to our employees	We identify improved and/or alternate training materials, approaches and methods and implement these across relevant internal stakeholder groups.
The effectiveness of grievance and remediation processes	We amend grievance and reporting mechanisms to improve accessibility, effectiveness and responsiveness. We amend remediation processes to reflect learnings arising from reviews.

Compliance with Modern Slavery Requirements

This plan was prepared considering the NSW Anti-slavery Commissioner’s Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply Chains (version 1.0, December 2023), and in accordance with the criteria set out in the Australian Modern Slavery Act 2018 (Cth).

This statement was approved by the principal governing body of Vehicle Dealers International Pty Ltd on 27 November 2025.

The following table outlines where information related to each mandatory reporting criterion can be located within the report.

Mandatory criteria for Modern Slavery Statements	Location of Information	Page
Identify the reporting entity	Our structure and governance	3
Describe the structure, operations and supply chains of the reporting entity	Our structure and governance	3
	Our operations	6
	What we source	8
	Our supply chains	9
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Our team	7
	Identifying our modern slavery risks	11
	Assessing our modern slavery risks	12
	Assessing our supply chain modern slavery risks	13
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Our reasonable steps	5
	Stakeholder engagement	10
	How we address modern slavery risks	14
	Our modern slavery response	15
	How we inform and educate our personnel	16
Describe how the reporting entity assesses the effectiveness of such actions	How we track the effectiveness of our actions	18
	How we improve our response to modern slavery	19
Describe how the reporting entity consulted on its statement with any entities it owns or controls.	Not applicable. Vehicle Dealers International Pty Ltd does not own or control any entities.	N/A
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Our commitment	2
	DRIVEN by our values	4
	Our approach to grievance management	17



DRIVEN