

PEDAL GROUP

“Enrich mind, body, earth or soul with the freedom of riding”

MODERN SLAVERY STATEMENT For the financial year ending 30 June 2023

This Modern Slavery Statement was approved by the Board of The Pedal Group Pty Ltd,
on 30 December 2023



ADVANCE
TRADERS

PEDAL GROUP
PROPERTY

Contents

- 1. About the Statement**
- 2. A message from our Chief Executive Officer**
- 3. Our Structure, Operations & Supply Chains**
- 4. Risks of Modern Slavery Practices in our Operations and Supply Chains**
- 5. Actions Taken to Assess and Address Modern Slavery Risks Supplier**
- 6. Assessing the Effectiveness of our Actions/KPI's**
- 7. Consultation with owned or controlled entities**
- 8. Future Actions**

1. About the Statement

Pedal Group Pty Ltd has prepared this Modern Slavery Statement (“Statement”) to meet the reporting requirements of the Australian Modern Slavery Act 2018 (Cth). The statement outlines the actions that have been taken by the Pedal Group to identify, assess and address modern slavery risks across our operations and supply changes during the financial year commencing 4 July 2022 and ending 2 July 2023.

This Statement is made on behalf of the reporting entity Pedal Group Pty Ltd (ABN: 67 131 402 278) and its subsidiaries and the entities it owns and controls, including:

- 99 Bikes Pty Ltd (“99 Bikes AU”) (ABN: 87 123 966 665)
- 99 Bikes NZ Limited (“99 Bikes NZ”) (Business Number: 9429047826281)
- Advance Traders (Australia) Pty Ltd (“ATA”) (ABN: 21 130 664 194)
- Pedal Group Property Pty Ltd (“PGP”) (ABN: 66 622 878 808)
- 99 Bikes Limited (“99 Bikes UK”) (Company Number: 03690687)

2. A message from our Chief Executive Officer

I am pleased to present the Pedal Group's fourth modern slavery statement. In FY23 we have made progress and recognise it is a continuous process of ongoing improvement.

Last year we identified key initiatives which we have made progress on including establishing a Pedal Group Supplier Code of Conduct which involved supplier acknowledgement of the code and a self assessment. We built expertise among our procurement teams through training to ensure our team members understand our policies and identify risks through the supply chain, which included expanding our Human Resources policies across all Pedal Group businesses in Australia & New Zealand.

Pedal Group earned B-corp certification in December, 2023, with a program of continual improvement considering all stakeholders - our people, customers, communities and shareholders, and this commitment to our purpose is now written into the company constitution. There is still plenty of work to do in this area and all teams across the business are engaged and helping towards our goals of reducing our impact on the environment, ethical sourcing, and selling products that enrich the lives of our customers.

The Pedal Group continues to focus and improve on working to identify, address and mitigate the risk of modern slavery in our supply chain and operations.

This Modern Slavery Statement was approved by the Board of Pedal Group Pty Ltd, on behalf of itself, and all owned entities on 30 December 2023.

A handwritten signature in blue ink, appearing to read 'A Garnsworthy', with a large, stylized flourish at the end.

Andrew Garnsworthy

Pedal Group CEO

30 December 2023

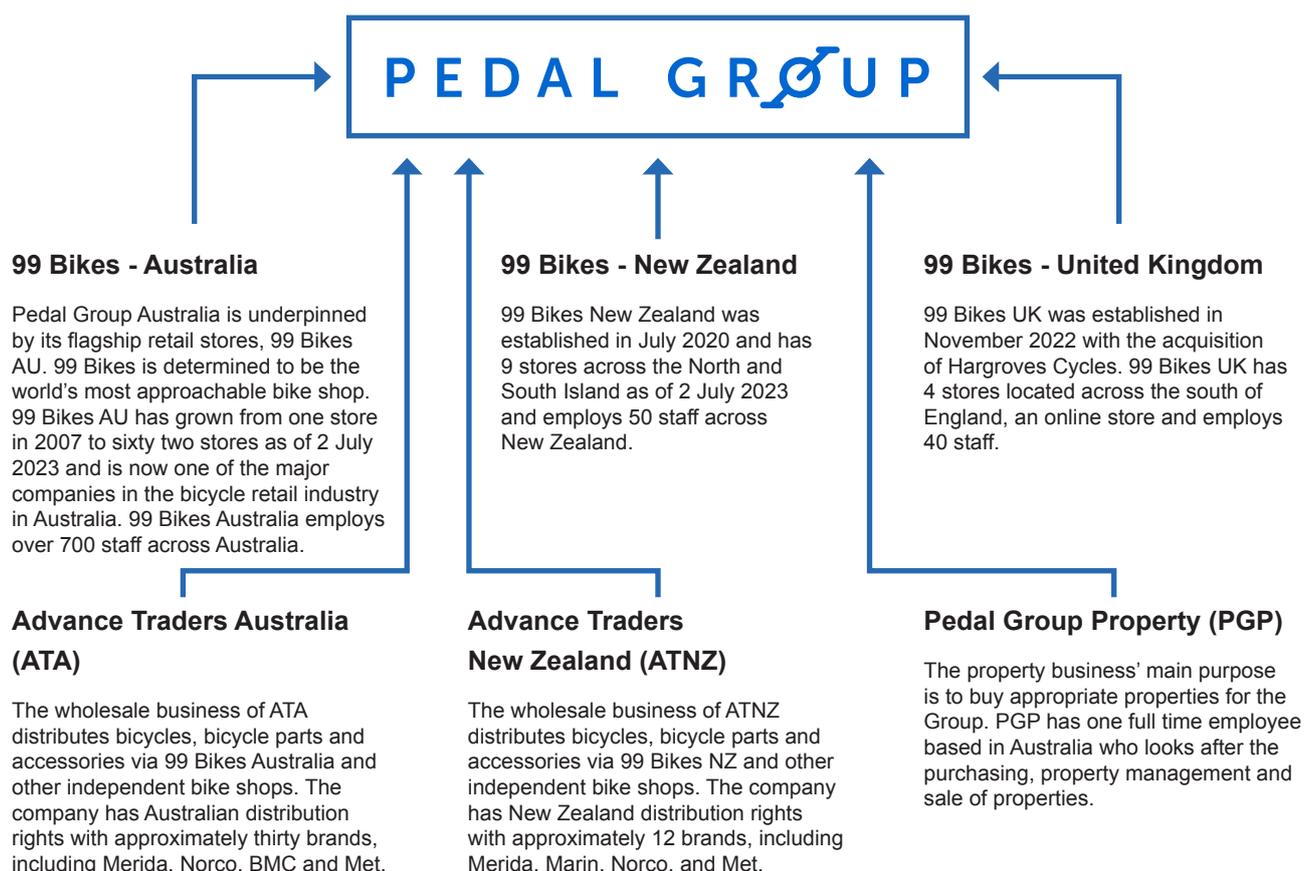
3. Our Structure, Operations and Supply Chains

Our Structure and Operations

The Group's operations started in Brisbane, Australia in 2007. Overseas expansion into New Zealand occurred on 1 July 2020 with the opening of 99 Bikes retail stores and commencing wholesaling operations under the Advance Traders (New Zealand) brand. During this year the Group expanded into the United Kingdom, acquiring 4 Hargroves Cycles stores in November 2022 which have now been rebranded to 99 Bikes UK.

Today the Pedal Group is Australia's largest bicycle company, backed by major investor Flight Centre Travel Group, and has over 800 employee shareholders. Pedal Group operates 75 bicycle retail stores globally, two wholesale distribution businesses, and a commercial property business.

All Pedal Group businesses have a shared set of values and the purpose is to Enrich mind, body, earth or soul with the freedom of riding.



Our Structure and Operations (Cont.)

As at 2 July 2023 all employees of the Group were employed in Australia, New Zealand and the United Kingdom with the majority employed under the General Retail Industry Award, which sets minimum pay and conditions for specific categories of workers. The remainder of our employees have individual employment contracts, which provide additional conditions for an individual employee, but cannot reduce or remove the minimum entitlements prescribed under the National Employment Standards. We undertake reviews of the General Retail Industry Award and employment contracts to ensure our workers' entitlements are being met. We undertake payroll reviews to ensure our workers are being paid correctly.

Our Supply Chain

The Group sources products, parts and services from the following countries:

- **Australia**
- **Taiwan**
- **USA**
- **Switzerland**
- **Austria**
- **Japan**
- **New Zealand**
- **Hong Kong**
- **United Kingdom**
- **Italy**
- **Poland**
- **China**
- **Canada**
- **Germany**
- **Portugal**
- **Netherlands**



Our Supply Chain (Cont.)

The Group's supply chain includes the various goods and services it procures that contribute to the services and products the group sells. The goods and services that we procure fall into the following categories:



**BICYCLES AND BICYCLE
RELATED PRODUCTS
FOR RESALE**



**WORKSHOP
CONSUMABLES**



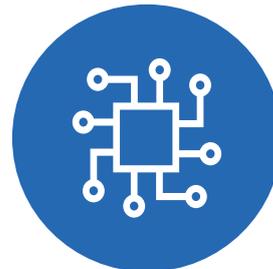
PROPERTY



UTILITIES



TOOLS AND EQUIPMENT



TECHNOLOGY PRODUCTS



OFFICE CONSUMABLES



**TRANSPORT AND
FREIGHT**



**PROFESSIONAL
SERVICES AND
CONSULTANTS**

4. Risks of Modern Slavery Practices in our Operations and Supply chains

The Group's supply chain includes the supply of goods and services used in operations. This includes but is not limited to bicycles, bicycle parts and accessories such as clothing and footwear, car racks, helmets, tools and equipment.

Geographically, Pedal Group operates in the low risk countries of Australia, New Zealand and the United Kingdom. The Groups suppliers are reported to have a medium to low risk prevalence of modern slavery as reported by the international standard 2023 Global Slavery Index published by Walk Free.

Pedal Group seeks to partner with suppliers that ensure a fair and ethical workplace, where the highest standards of human rights are upheld. Parts and components are supplied by reputable companies, however there is a risk that manufacturer or supply of some parts and components may contribute to modern slavery practices.

5. Actions taken to Assess and Address Modern Slavery Risks

Supply Chain

We have endeavoured to understand modern slavery risks across our operations and supply chain. Pedal Group will continue to build expertise within its procurement teams and raise awareness among suppliers in relation to modern slavery issues.

Pedal Group screens suppliers for adverse media relating to human exploitation. Pedal Group is committed to not knowingly conducting business with any company or individual engaged in modern slavery, human trafficking or knowingly permitting such conduct to be carried out in any of our supply chains.

99 Bikes Australia includes anti-slavery and anti-human trafficking clauses in contracts with suppliers.

In December 2022, Pedal Group established a "Supplier Code of Conduct", to share with all main suppliers for sign-off, requesting a copy of their internal Code of Conduct and a self assessment review. The sections covered in our "Supplier Code of Conduct" include:



Operations

At the Pedal Group we are committed to ethical and responsible business conduct in our supply chain and operations. We believe in treating all our employees and those who work in our supply chains with dignity and respect and consider fair labour practices to be an important component of their human rights. We seek to engage with business partners that respect the protection of human rights and that demonstrate sound ethical practices. We expect our employees and all individuals who work for us, or on our behalf, to respect and uphold the human rights of others.

Pedal Group has a number of human resource policies that have been expanded across the entire group except 99 Bikes UK which include:

**CODE OF
CONDUCT**

**ANTI-BULLYING,
HARASSMENT
AND
DISCRIMINATION**

WHISTLEBLOWING

**OCCUPATIONAL
HEALTH AND
SAFETY**

Other policies include:

**ANNUAL LEAVE
/ FLEXIBLE
WORKING
ARRANGEMENTS**

**COMMUNICATION,
EMAIL AND
INTERNET
POLICY**

**DISPUTE
RESOLUTION**

**SEXUAL
HARASSMENT**

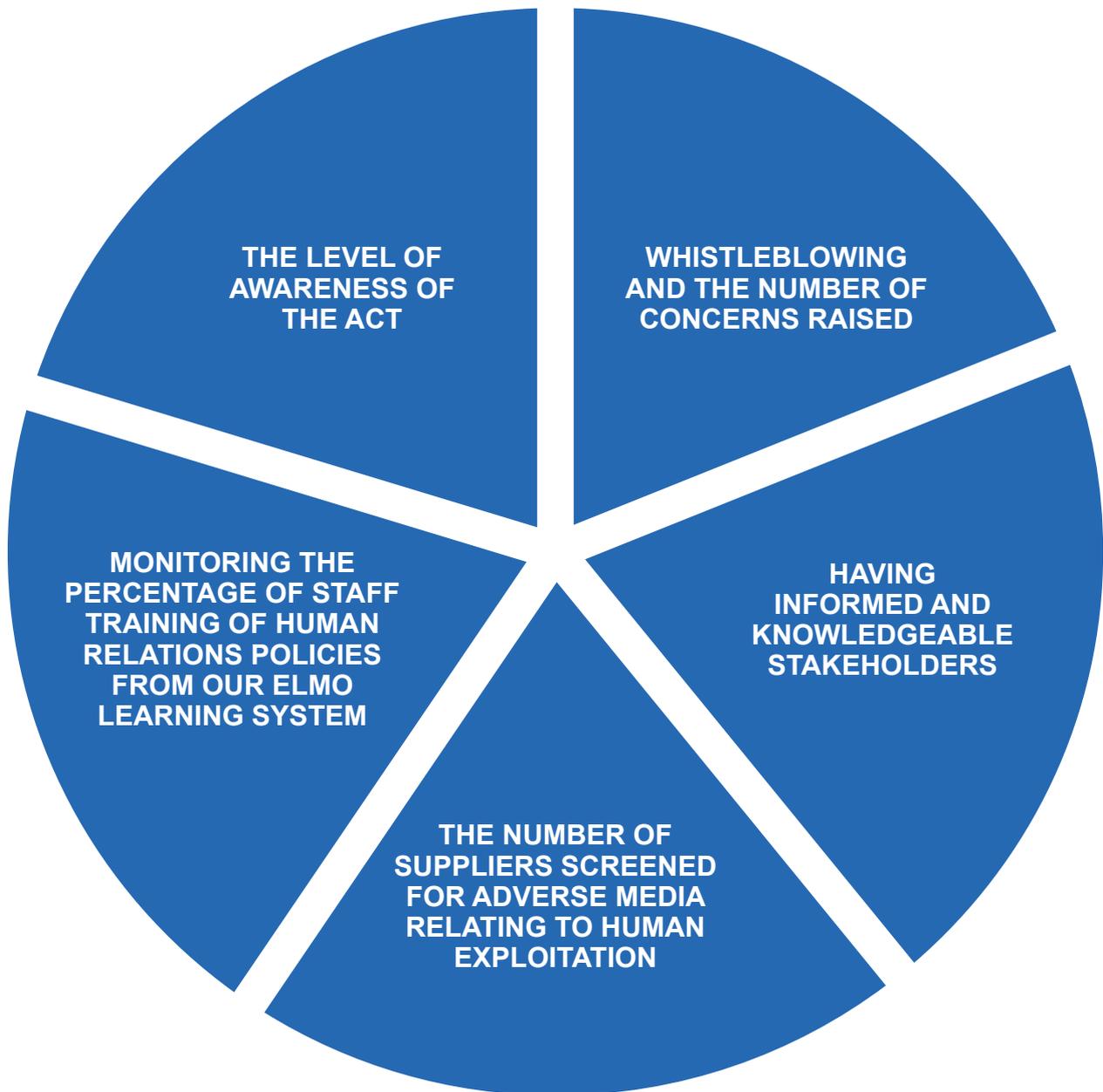
**DOMESTIC &
FAMILY ABUSE**

**DRUG, ALCOHOL
& SMOKING
POLICY**

PARENTAL LEAVE

6. Measuring the effectiveness of our actions

Pedal Group is committed to effective actions to address modern slavery risks, and are measuring the effectiveness of our actions through:



7. Consultation with Owned or Controlled Entities

During the reporting period this statement covers, The Pedal Group actively engaged and consulted with all entities we own or control in the development of this statement. We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

8. Future Actions

The Group will continue to identify and manage the risk of modern slavery in our organisation and supply chains.

Next steps include yet are not limited to:

- Supplier Code of Conduct continued rollout to all new and existing suppliers
- Continue to build expertise among our procurement teams through training to ensure our team members understand our policies and identify risks through the supply chain;
- Continue to monitor existing supply chain through supplier screening for adverse media relating to human exploitation
- Expanding our Human Resources & Ant-slavery policies across the entire Group in Australia, New Zealand and UK
- Review current training and roll out a new internal training module to all relevant staff
- Continued education with our employees and suppliers about the Modern Slavery Act
- Develop a Modern Slavery Response & Remedy Framework
- Identify risk areas around our Sourcing and Quality Standards
- Conduct factory audits by reputable 3rd party companies