



Pamsim Pty Ltd
ABN 34 083 219 318

Modern Slavery Statement 2024

Reporting Period

This Modern Slavery Statement sets out the steps taken by the Company in the reporting period 1 January 2024 to 31 December 2024 to further prevent modern slavery in its business operations and supply chains.

Pamsim Pty Ltd recognises its obligations under the Modern Slavery Act 2018 (Cth) and the importance of protecting human rights and ensuring our employees, customers (guests) and those within our supply chain operations are free from all forms of modern slavery.

Covered Entities

Pamsim Pty Ltd did not own or control any other entity within the reporting period. Accordingly the reporting criteria regarding the process of consultation with any owned or controlled entity is not applicable.

Business Structure, Operations and Supply Chains

During the 2024 reporting period, Pamsim Pty Ltd's structure did not change. The company continues to trade as Nunawading Toyota ABN (34 083 219 318), operating as a motor vehicle dealership in Victoria under a franchising arrangement with Toyota Motor Corporation Australia Limited (TMCA). As at 31 December 2024, Pamsim Pty Ltd's financial year end, the company employed 103 staff.

Our key business operations include:

- the sale of new and used vehicles
- the sale of parts and accessories and aftermarket (car care) products
- the full servicing of new and used vehicles
- the provision of finance, insurance and warranty products to vehicle customers (guests)

Our supply chains include motor vehicles and parts, consumables such as fuel, oil, and lubricants and services including car and office cleaning, waste disposal, transportation of vehicles and parts, IT hardware and software, telecommunications, and office supplies and professional services.

Nunawading Toyota

Pamsim Pty Ltd
T/A Nunawading Toyota LMCT 9227
Admin and Sales
275 Whitehorse Road
Nunawading VIC 3131
T 03 9877 3133
F 03 9878 9505

ACN 083 219 318 ABN 34 083 219 318

Service and Parts
88 Station Street,
Nunawading VIC 3131
Service Parts
T 03 8872 8888 T 03 8872 8800
F 03 8872 8872 F 03 8872 8877

Service Centre
26 Firth Street
Doncaster VIC 3108
T 03 9848 8322
F 03 9848 8901



Oh what a feeling!

Modern Slavery Risks in our Operations and Supply Chains

Since its inception, Pamsim Pty Ltd has been committed to ethical and fair conduct of its managers, employees, contractors and suppliers. This has been demonstrated through our policies and practices and our efforts to combat modern slavery in all its forms. Pamsim Pty Ltd is committed to working within our operations and supply chains to prevent the existence of a modern slavery environment wherever possible.

Our Operations

The automotive industry in Australia relies on the importation of vehicles, accessories and spare parts. Pamsim Pty Ltd sources the majority of products from Toyota Motor Corporation Australia Limited as part of a franchise arrangement. TMCA's Anti-Modern Slavery Statement 2024 details their targeted approach to modern slavery risks within their global supply chain and we would expect that their operations would comply with the Modern Slavery Act 2018.

Given our operations are solely in Australia, our geographic risk of modern slavery remains low according to the Global Slavery Index. There is no identified vulnerability to modern slavery in our industry sector within Australia.

The Global Estimates of Modern Slavery 2021 report identifies that the use of unprotected migrant workers, especially those in lower skilled sectors and people subject to discrimination are vulnerable to modern slavery.

Pamsim Pty Ltd considers the risks of modern slavery practices within its business operations and supply chain to be low as we operate within Victoria, Australia and our staff are employed and remunerated under Federal and Victorian State Awards. The Fair Work Act National Employment Standards are incorporated into all employment contracts. We work very closely with the Victorian Automobile Chamber of Commerce on policy determination and interpretation. Pamsim Pty Ltd has a direct association with the Department of Home Affairs on any skilled migrant labour intake and works within the prescribed legislative framework.

Actions to Assess and Address Modern Slavery Risks

Pamsim Pty Ltd has an online Contractor / Service Provider prequalification and induction database in operation that requires potential contractors / suppliers to complete a detailed questionnaire on its operations, including their compliance with a range of legislative and regulatory frameworks. A component of the prequalification questionnaire asks the contractor / supplier if they are obligated to report under the Modern Slavery Act (Cth) 2018, and if so, requires them attach a copy of their Modern Slavery Statement. The potential contractor / supplier is also required to complete a company induction that includes in part, a commitment to comply with our ethical and fair conduct standards.

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Note: A 2024 audit of contractor prequalification questionnaires indicates that most are not required to report under Modern Slavery Act (Cth) 2018.

Pamsim Pty Ltd has developed an extensive suite of employment policies and procedures that reinforce its commitment to ethical and fair conduct. This includes the Company Code of Conduct, the Employee Handbook, New Starter documents and an array of policies and procedures that are made available on the company intranet. The inclusion of a Modern Slavery statement to the company's suite of policies reinforces the company's commitment to the Modern Slavery Act and protecting human rights throughout the business. All employment policies are reviewed periodically and updated to ensure compliance with legislative changes or community standards.

Pamsim Pty Ltd's policies reviewed during 2024 included:

- Code of Conduct – which applies to all employees and clearly defines the values of the business and the expectation that all staff, contractors, and suppliers will work within its framework.
- Personal Conduct Policy – grievance and complaints processes
- Employee Handbook – Modern Slavery included
- Employment Contracts
- Notifiable Data Breach Policy
- Online Incident Register
- Modern Slavery Policy
- Whistleblowers policy

The annual Minimum Wage Case (MWC) review was completed in July 2024. This yearly review ensured all employees receive at least the minimum base award rate of pay and took into account minimum award adjustments determined by the Fair Work Commission in June 2024. In addition, quarterly audits of employee salaries and payments undertaken throughout 2024 ensured employees were remunerated in accordance with the Fair Work Commissions general principle that employees should be paid at least the equivalent of the minimum award rate for all hours worked.

Pamsim Pty Ltd continues to work within the required legislative frameworks for the recruitment, and ongoing employment of all its staff from both within Australia and from overseas.

The Pamsim Pty Ltd Whistleblower Policy offers an anonymous channel to report unethical conduct or behaviour. This includes illegal acts and modern slavery violations. Any reports are treated confidentially and are fully investigated. If the complaint is in relation to a supplier, Pamsim Pty Ltd will notify the supplier and work with them to resolve the matter and reinforce our code of conduct and ethical standards. A breach of the modern slavery principles may well result in the termination of our business relationship. The Whistleblower Policy is available to all staff and we encourage employees to report any concerns.

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Assessing the Effectiveness of our Actions

Pamsim Pty Ltd recognises the importance of constantly assessing and reviewing our efforts to eliminate modern slavery risks from both within our operations, and throughout our supply chains. Internal procedures and systems to audit, report and mitigate modern slavery risks are in place.

Pamsim Pty Ltd will continue to assess the effectiveness of its actions to identify and eliminate modern slavery risks by: conducting ongoing internal audits of company employment practices and the payroll database, and engaging with our suppliers via our onboarding process to monitor compliance with their Modern Slavery statutory obligations. Based on the outcomes of these audits we will adjust our processes to ensure modern slavery concerns and risks are understood and managed in accordance with our commitment to ethical, responsible and sustainable business conduct.

For the 2024 reporting period no modern slavery concerns were identified.

Key Areas of Action 2025

Pamsim Pty Ltd will continue to identify areas of focus to strengthen its measures and prevent modern slavery in all parts of its business. Key initiatives will include:

- Identify high risk suppliers for review of their ongoing compliance
- Review and strengthen our supplier induction
- Development and distribution of a Supplier Code of Conduct

Approval

This statement was approved by the board of Pamsim Pty Ltd in their capacity as principal governing body of Pamsim Pty Ltd on 26 June 2025.

This statement is signed by Brett Jefferson in his role as CEO and Director of Pamsim Pty Ltd on 26 June 2025



Brett Jefferson

CEO and Director Pamsim Pty Ltd

26 June 2024

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