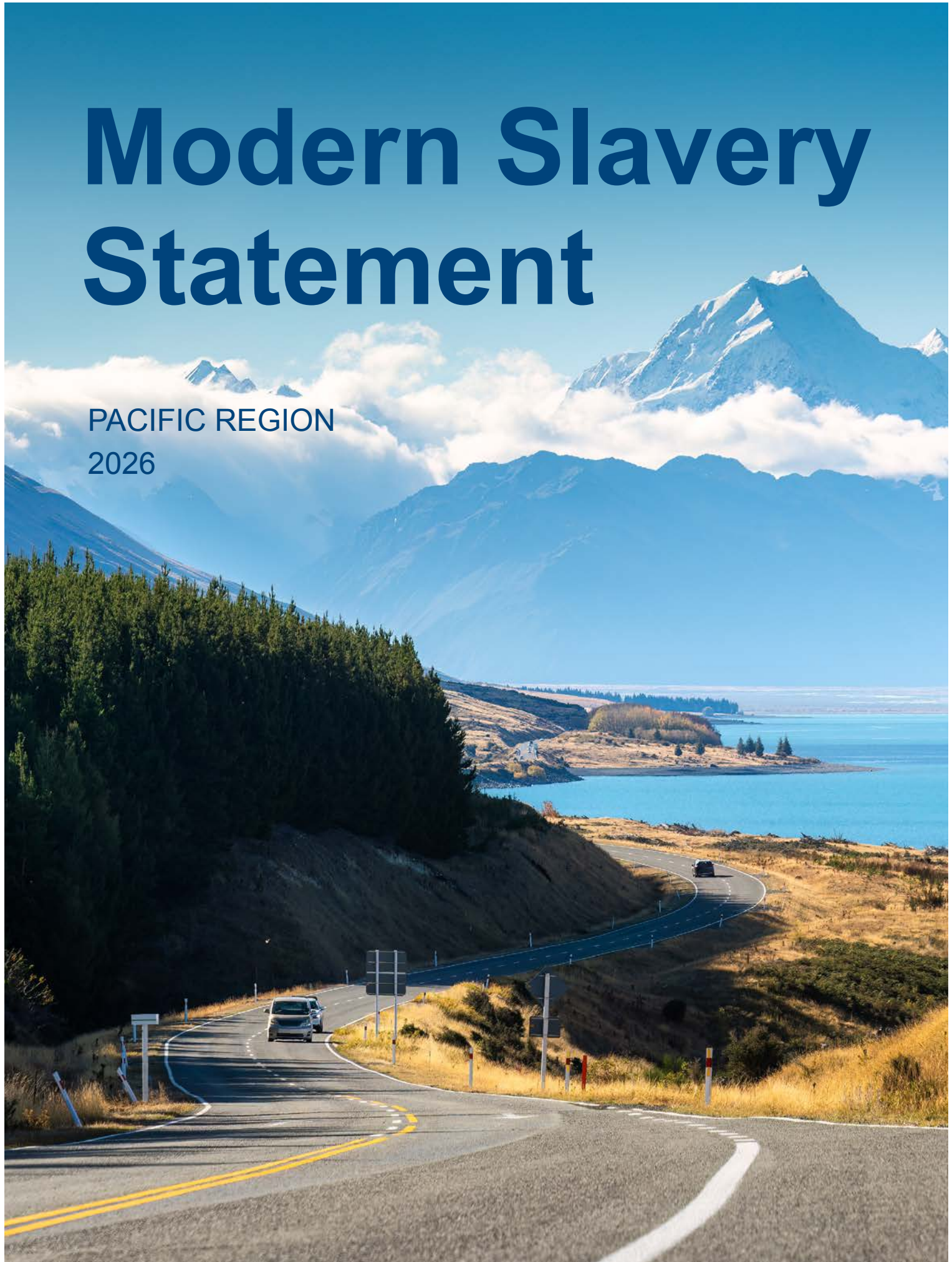
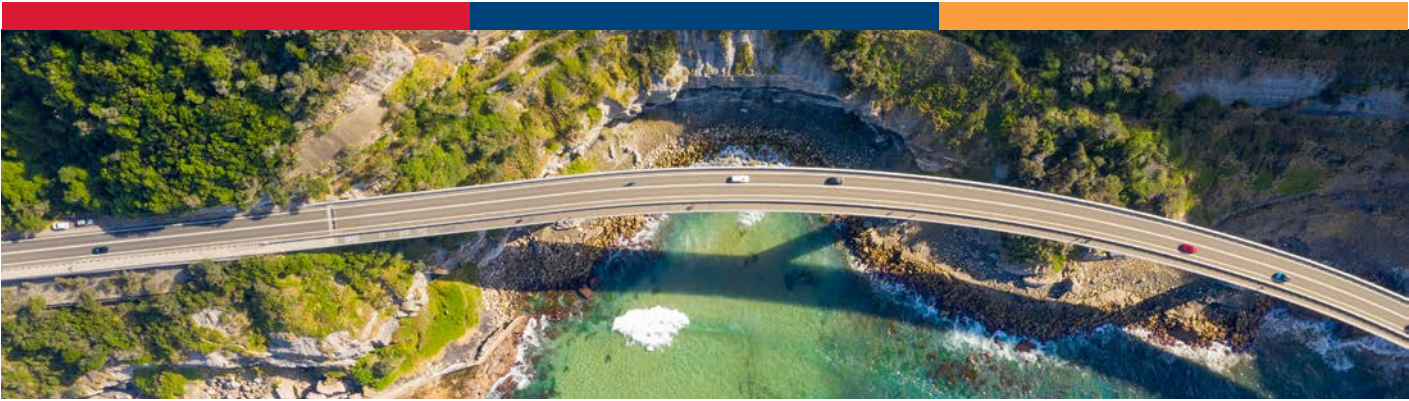


Modern Slavery Statement

PACIFIC REGION
2026





1. Introduction

This is the 2025 Modern Slavery Statement (Statement) made by the Avis Budget Group Pacific Region (ABG) pursuant to the Modern Slavery Act 2018 (Cth) (the Act). This Statement covers the reporting period 1 January 2025 to 31 December 2025 (FY2025).

ABG is committed to respecting human rights and taking meaningful action to identify, assess and address the risks of modern slavery in its operations and supply chains. This Statement sets out the actions ABG has taken during FY2025 to identify, assess and address these risks, and outlines our plans for continuous improvement.

This Statement is due for submission on or before 30 June 2026, in accordance with section 13 of the Act. The ABG Pacific Region reporting entities have consolidated revenue in excess of AU\$100 million and are therefore reporting entities within the meaning of section 5 of the Act.

Globally, Avis Budget Group, Inc. generates approximately US\$12 billion in annual revenue, connecting approximately 200,000 vehicles to customers via a network of approximately 10,250 rental locations in approximately 180 countries. In FY2025, the Avis Budget Group completed approximately 38 million vehicle rental transactions worldwide, supported by an average global rental fleet of around 684,000 vehicles.



**\$12 Billion
Annual
Revenue Worldwide**



**200,000
Connected
Cars**



**691,500 Vehicles
39 Million Vehicles
Rented Worldwide**



**10,250 Rental Locations
in 180 Countries
Around the World**



2. Organisation, Operations and Supply Chains

Reporting Entity Identification

For the purposes of section 5 of the *Modern Slavery Act 2018* (Cth), the reporting entity for this Statement is **WTH Pty Ltd (ABN 15 000 165 855)**, which meets the AU\$100 million consolidated revenue threshold.

This is a **joint modern slavery statement** given on behalf of all entities listed below, pursuant to section 14 of the *Modern Slavery Act 2018* (Cth). Each entity covered by this Statement is either owned or controlled by or is a member of the same corporate group as, the reporting entity.

Our Organisation

This Joint Modern Slavery Statement is given on behalf of the following entities:

Australia

- Avis Management Pty Ltd (ABN 50 001 889 336)
- W.T.H. Pty Ltd (ABN 15 000 165 855)
- Budget Rent A Car Australia Pty Ltd (ABN 89 007 348 021)
- Budget Rent A Car Operations Pty Ltd (ABN 55 054 583 925)
- Apex Car Rentals Pty Ltd (ABN 65 159 894 970)
- W.T.H. (Sub 1) Pty Ltd (ABN 86 070 810 703)
- AB Funding Pty Ltd (ABN 95 125 104 654)
- AU Holdco Pty Limited (ABN 57 159 895 744)

New Zealand

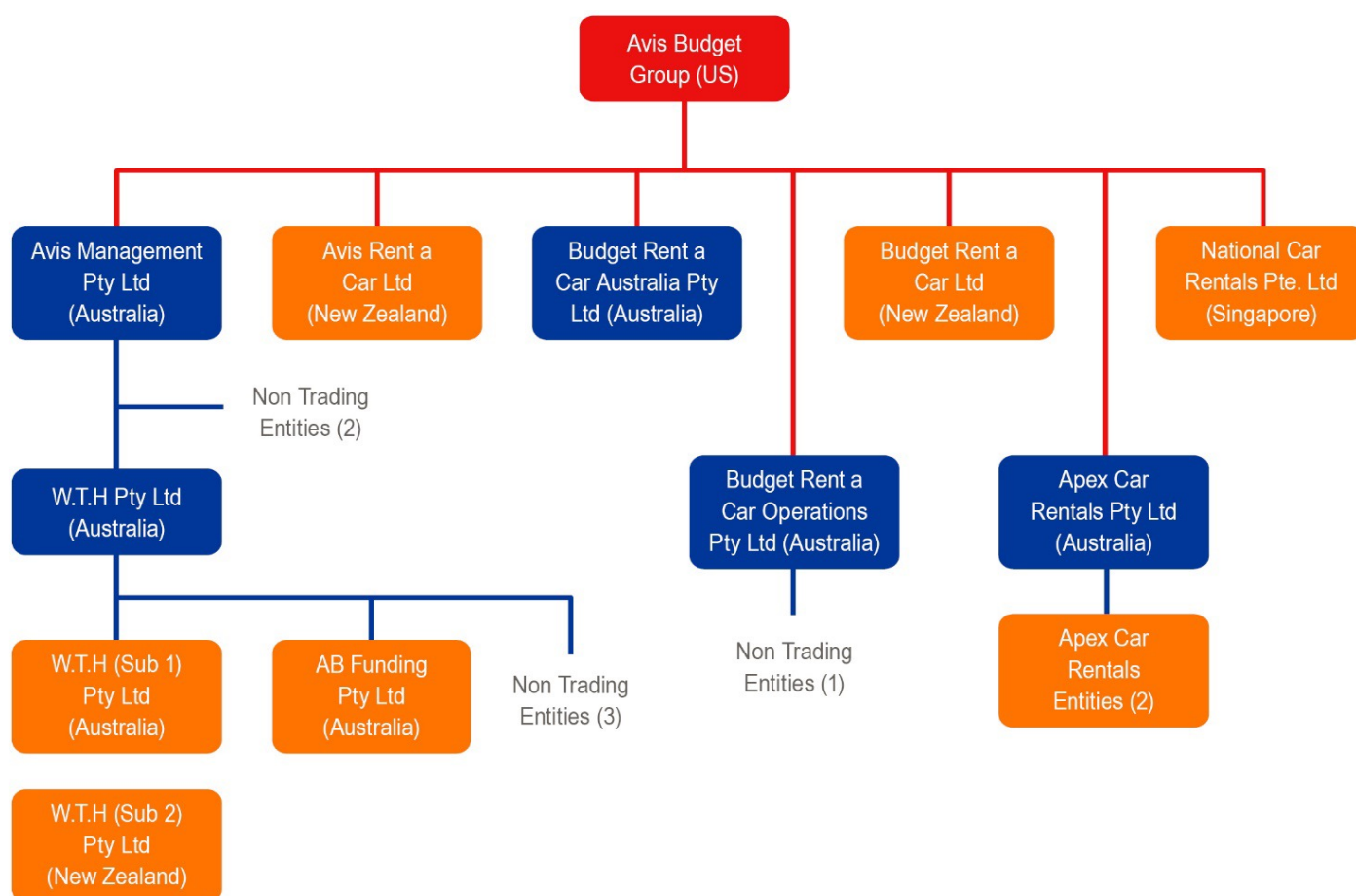
- Avis Rent A Car Limited (NZBN 9429040195810)
- W.T.H. (Sub 2) Pty Ltd (NZBN 1172297)
- Budget Rent A Car Limited (NZBN 9429039997920)
- Apex Car Rentals (NZBN 9429030667440)

Singapore

- National Car Rentals (Private) Ltd (Company number: 196100157E)

This cross-functional coordination, combined with the common directorship structure, ensures a comprehensive and unified response to modern slavery across all entities.

Organisational Structure Chart



Covered by Global
Modern Slavery
Statement



Entities covered by the joint
statement under Modern
Slavery Act 2018 (Cth)



Entities making a joint
statement under Modern
Slavery Act 2018 (Cth)

Our Structure and Operations

ABG's Pacific Region operations are headquartered in Sydney, Australia. In FY2025, ABG employed over **1800** employees across more than **96** locations in Australia, New Zealand, and Singapore. ABG operates under three brands: Avis, Budget, and Apex.



ABG's principal activities in the Pacific Region include the rental of passenger vehicles and light commercial vehicles, together with the provision of related products and services to leisure and corporate customers.

Consultation Process

This is a joint modern slavery statement given on behalf of all entities listed above pursuant to section 14 of the Act.

The directors and management teams of each of the entities covered by this joint statement are common to the reporting entity, WTH Pty Ltd.

As the same directors govern all entities within the Avis Budget Group in the Pacific, and the entities share centralised management, policies, processes and reporting lines, extended consultation between the entities would be academic in nature. The directors, in their capacity across all entities, have direct oversight of and involvement in the preparation of this statement, ensuring that the modern slavery risks, actions, and outcomes relevant to each entity are properly considered and reflected.

Notwithstanding the above, in preparing this statement, the Avis Budget Group's Pacific Legal function coordinated with the relevant operational and compliance teams across the Group to collate information regarding modern slavery risks, due diligence activities and remediation outcomes for the FY2025 reporting period.

Our Suppliers

ABG engages more than 1027 direct suppliers, with an annual spend (excluding fleet vehicle purchases) of approximately AU\$135 million. Approximately 50% of this non-fleet spend is concentrated across fewer than 50 suppliers.

ABG's supply chain can be broadly categorised into three areas:

Fleet:

- Vehicles (passenger and light commercial)
- Parts and accessories
- Vehicle repairs and maintenance

IT and Telecommunications:

- Technology platforms and systems
- Telecommunications services

Non-Fleet:

- Professional services (legal, accounting, consulting)
- Uniforms and corporate wear
- Fuels and lubricants
- Outsourced call centre services
- Cleaning and detailing services
- Office supplies and facilities management

Our Franchisees

ABG's franchisee network complements the corporate-operated rental locations across the Pacific Region. Franchisees operate under ABG's brand standards and are subject to a contractual framework that includes modern slavery compliance obligations.

In FY2025, ABG continued to strengthen its engagement with franchisees on modern slavery compliance. The contractual framework requires each franchisee to provide an annual signed Modern Slavery Compliance Statement. In 2024/2025, ABG implemented an audit process that includes random employee interviews conducted at franchisee locations. Ten franchisee audits were completed during FY2025 (out of a total of approximately 54 franchisees).

Risks of Modern Slavery in Our Operations

ABG has identified the following areas of its operations as presenting heightened modern slavery risk:

Labour Hire:

ABG engages labour hire providers to supplement its workforce during peak periods. Labour hire arrangements present elevated risks due to the use of intermediaries in employment relationships, potential for exploitation of temporary or migrant workers, and reduced visibility over working conditions. During FY2025, ABG continued its audit programme for cleaners and detailers, including site visits and worker interviews in Newcastle, Sydney, Brisbane, Melbourne and Perth

Outsourced Call Centres:

ABG engages third-party providers for call centre services. This arrangement present moderate-to-high risk due to the potential for subcontracting, the use of workers in lower-wage jurisdictions and reduced direct oversight of employment conditions.

Cleaners and Detailers:

Office cleaning services are usually performed by vulnerable and low wage employees. ABG has commenced a process of consolidating office cleaning service providers by State. Having multiple providers in each State was identified as representing a higher risk and therefore the decision was made to consolidate providers in each State.

avis budget group

Modern Slavery Compliance Certificate

Franchisee certifies that, for the period xxx to xxx:

- it and its related bodies corporate have policies in place which prohibit breaches of Modern Slavery Laws;
- to the best of its knowledge and belief, it confirms there are no breaches of Modern Slavery Laws in its or its related body corporates' supply chains or any parts of their businesses; and
- neither it, its related bodies corporate, nor Franchisee's personnel:
 - have been convicted of any offence involving Modern Slavery Laws; and
 - to the best of its knowledge, having made reasonable enquiries, have been or are the subject of any investigation, inquiry or enforcement proceedings by any government agency regarding any offence or alleged offence of, or in connection with, Modern Slavery Laws.

Modern Slavery Laws means any laws, rules or other legally binding provisions or any jurisdiction that, or becomes, applicable to a party including but not limited to the Modern Slavery Act 2015 (Cth), the Modern Slavery Act 2015 (NSW), Chapter 4, Division 23 of the Criminal Code No. 250C (Vic) and any relevant legislation or regulatory act that on hearing, has/has not.

- creates a monitoring or due diligence obligation to connect with modern slavery; or
- creates (or imposes a penalty for) modern slavery.

Signed by a Director of Franchisee

Signature: _____ Date: _____

Risks of Modern Slavery in Our Supply Chain

Uniforms

ABG sources uniforms from a single supplier that holds SMETA (Sedex Members Ethical Trade Audit) certification. This provides assurance regarding labour practices in the uniform supply chain.

Child Restraint

ABG's child restraint supplier holds SEDEX four-pillars certification, providing independent verification of labour standards, health and safety, environment, and business ethics.

Office cleaners

ABG has a standard contractual framework in place with office cleaning providers. In FY2025, ABG consolidated Office Cleaner providers in Victoria and ABG is planning to roll out further consolidation in other States in FY2026

Employee Risks

ABG assesses the risk of modern slavery within its direct workforce as negligible. All employees are engaged under direct employment agreements that comply with applicable Australian, New Zealand, or Singaporean legislation. Employee entitlements, including wages, hours, and conditions, are governed by applicable awards, enterprise agreements, and employment legislation.

Actions Taken to Assess and Address Modern Slavery Risks

ABG's approach to addressing modern slavery risks is based on five core elements:

- Policies
- Training
- Risk Assessment and Due Diligence
- Remediation
- Continuous Improvement

These elements are supported by a governance framework overseen by ABG's Pacific Legal function, which reports directly to the Pacific Managing Director

Governance

The Pacific Legal function has primary responsibility for ABG's modern slavery compliance programme. The Legal function reports to the Pacific Managing Director and is responsible for coordinating risk assessments, training, supplier due diligence, and the preparation of this Statement.

Recent Modern Slavery Related Achievements

Year	Achievement
2021	Implementation of foundational policies (Code of Conduct, Human Rights Policy Statement, Third Party Standards of Conduct); rollout of modern slavery training programme; development and distribution of supplier modern slavery questionnaire.
2022	Implementation of risk-based due diligence approach to supplier engagement; enhanced supplier assessment processes.
2023	Establishment of ESG governance framework integrating modern slavery compliance into broader corporate governance structures.
2024	ESG embedded into operations and franchisee network; implementation of franchisee audit process including random employee interviews.
2025	Extension of interview-based audits to franchisees and progress on single-supplier consolidation for office cleaning in each State.

Policies and Procedures

ABG maintains the following policies relevant to modern slavery:

Policy	Description	How Is It Implemented
Code of Conduct	The purpose of the Code of Conduct is to promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; to promote full, fair, accurate, timely and understandable disclosure in periodic reports required to be filed by the company; and to promote compliance with all applicable rules and regulations that apply to the company and its officers and directors. The Code of Conduct has been translated into 14 languages.	The Code of Conduct is publicly available on our Corporate website and is published on internal communication channels. All of our employees are required to complete the Code of Conduct learning and module, agree to comply with our Code of Conduct policies and related policies, including those pertaining to ethics & integrity and anti-bribery. Managers also complete the “Receiving and Escalating Concerns” module. Additionally, we conduct awareness programs to support a “See Something, Say Something” culture across our organization.
Human Rights Policy Statement	Guided by our Human Rights Policy Statement, we strive to conduct our business in a manner consistent with the UN Guiding Principles on Business and Human Rights and the International Labour Organisation’s Fundamental Conventions. Central to our policy statement is the belief that child labour, human trafficking or other illegal, abusive, or forced labour practices have no place within our operations or our supply chains anywhere in the world. We focus on creating a culture and business environment based on transparency, inclusion, mutual respect, responsibility, and understanding.	To support compliance with the human rights standards set forth in our Third-Party Standards of Conduct, we encourage our partners and suppliers to periodically conduct self-evaluations to ensure that they, along with their subcontractors, complying with our human rights standards.

Whistle-blower Policy & Integrity Hotline	Outlines the standards and procedures by which Avis Budget Group’s employees should report instances of non-ethical behaviours. Our Integrity Hotline is available 24/7 and is a completely confidential channel for reporting serious concerns and complaints. Employees can reach the Integrity Hotline through dedicated phone lines or on the web. We maintain a non-retaliation policy that prohibits threats of retaliation or other discrimination directly related to any report made by an employee. All reported	We provide a link and number to our Integrity Hotline where employees can report potential concerns or grievances or ask questions about ethics or compliance.
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Third Party Standards of Conduct	We recognize that our business has an impact on people, the communities where we operate, and the environment. Fostering sustainable relationships with our business partners, agents, consultants, suppliers, and other third parties is important to our business success. It is part of our standard business practices to select reliable and trustworthy partners as set forth by our Third-Party Standards of Conduct. While we cannot control all the activities and ultimate compliance of our business partners as they are independent entities, we aim to conduct appropriate diligence including research and analysis of a company or organization in the selection process to reduce risk and comply with the applicable laws. Our approach is to offer risk-based screening of our business partners to gauge their ability to comply with our Third-Party Standards of Conduct, as well as with applicable laws on corruption and bribery, competition and anti-trust, conflicts of interest, data privacy, and fraud.	The Third-Party Standards of Conduct is published on our corporate website, is referenced in our Purchasing Terms & Conditions and is included as an integral part to any Supply Contract.
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Sexual Harassment, Discrimination, Coercion and Intimidation	Our Sexual Harassment, Discrimination, Coercion, and Intimidation Policy is a comprehensive document outlining our commitment to providing a safe and respectful workplace for all employees and contractors. It defines unacceptable behaviours such as unwanted advances, offensive remarks, discriminatory actions (based on gender, race, ethnicity, religion, sexual orientation, or any other protected characteristic), coercion and intimidation practices. Ultimately, the goal of such a policy is to foster a work environment where every employee feels valued respected, and able to perform their duties without fear of harassment or discrimination.	The policy emphasises prevention through education and training programs aimed at raising awareness of what constitutes harassment, discrimination, coercion, and intimidation, as well as promoting a culture of respect and inclusivity. The policy also outlines procedures for reporting incidents, including confidential channels, and ensures that complaints will be promptly and impartially investigated. It also prohibits retaliation against individuals who report incidents or participate in investigations. Compliance with the policy is mandatory for all employees, with consequences for violations ranging from counselling and disciplinary action to termination, depending on the severity of the offense.
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Training

ABG has a specific Modern Slavery Policy that is mandatory for all new employees as part of their induction. The policy provides education on the indicators of modern slavery, ABG's approach to identifying and addressing risks, and reporting channels available to employees.

In FY2025, **targeted training was delivered to line managers as planned** via a Workday Learning campaign which was completed by 335 employees, of which 18 were senior management (E+ Grade). This represents 93.7% completion across the Pacific (with 100% completion for senior management).

Risk Assessment and Due Diligence

ABG undertakes Ethical Due Diligence prior to engaging third-party suppliers and service providers. This process is designed to identify potential modern slavery risks before formal engagement and includes assessment of the supplier's industry, geographic location, workforce composition, and existing compliance frameworks.

Remediation

ABG maintains multiple channels through which employees, suppliers, and other stakeholders can report concerns about modern slavery, including the Integrity Hotline, direct reporting to line managers, and the Legal function.

In 2025, **there were no reported incidents concerning modern slavery.**

ABG is committed to taking appropriate remediation action in the event that modern slavery is identified in its operations or supply chains, including working with affected individuals, suppliers, and relevant authorities to address the situation.

Continuous Improvement

ABG is committed to the continuous improvement of its modern slavery risk management framework. The following outlines progress against FY2025 initiatives and forward-looking commitments for FY2026/2027.

Progress Against FY2025 Initiatives:

Targeted Training for Line Managers – In FY2025, ABG delivered targeted modern slavery training to all line managers across the Pacific. The training covered identification of modern slavery indicators, reporting obligations, and supply chain oversight responsibilities.

Single Supplier Consolidation (Office Cleaning) – ABG made progress towards the consolidation of office cleaning services to a single supplier in each State. ABG completed consolidating to a single supplier in Victoria and aims to do the same in NSW, QLD and WA in FY2026.

Franchisees Engagement – ABG conducted 10 franchisee audits during FY2025, including random employee interviews. The audits revealed high level of compliance by franchisees.

Contractual Framework Enhancement – ABG strengthened its contractual framework by enhancements to modern slavery clauses in franchisee agreements.

Forward-Looking Commitments for FY2026/2027:

- Extension of audit programme to New Zealand operations
- Implementation of enhanced digital supplier risk assessment tools
- Expansion of modern slavery training to cover all staff, not only new starters and line managers
- Development of a supplier modern slavery risk rating framework



3. Assessing the Effectiveness of Our Actions

ABG assesses the effectiveness of its modern slavery risk management actions through a framework that encompasses:

- Clear policies and governance structures that define roles, responsibilities, and accountability for modern slavery compliance;
- Regular risk assessments to identify and prioritise modern slavery risks across operations and supply chains;
- Trusted mechanisms for reporting and addressing concerns, including the Integrity Hotline;
- Periodic review of supplier due diligence processes and outcomes;
- Monitoring of training completion rates and engagement with training content; and
- Review of audit findings and corrective actions across franchisee and supplier networks.

ABG acknowledges that tracking the effectiveness of modern slavery risk management is complex and continues to enhance its approach to measurement and reporting.

Effectiveness Indicators and Key Performance Indicators

ABG tracks the following indicators to assess the effectiveness of its modern slavery actions in FY2025:

Indicator	FY2025 Result
Percentage of employees who completed modern slavery training	93.7%
Number of franchisee audits completed (out of total)	10
Number of labour hire supplier audits completed	1 out of 1 (at Sydney, Brisbane and Melbourne)
Number of modern slavery complaints/incidents reported	0
Number of corrective actions identified and resolved	0

ABG will continue to refine these indicators and, where appropriate, set targets for continuous improvement. ABG will continue to strengthen its approach to assessing the effectiveness of our modern slavery initiatives, with a particular focus on improving the consistency, quality and actionability of supplier risk assessment. A key priority will be the implementation of enhanced digital supplier risk assessment tools to support more systematic data collection, monitoring and analysis across the supply chain. We also plan to develop a supplier modern slavery risk rating framework, enabling us to better identify higher-risk suppliers, prioritise engagement and due diligence activity, and track changes in risk profile over time. Together, these enhancements are intended to provide a more robust methodology for evaluating the impact of our modern slavery controls and informing targeted improvements to our programme.

4. Mandatory Criteria Reference Table

The following table identifies where each of the seven mandatory criteria under section 16(1) of the Modern Slavery Act 2018 (Cth) is addressed in this Statement:

Mandatory Criterion (s 16(1))	Description	Section Reference
(a)	Identify the reporting entity	Section 2 — Reporting Entity Identification
(b)	Describe the structure, operations and supply chains of the reporting entity	Section 2 — Our Organisation; Our Structure and Operations; Our Suppliers; Our Franchisees
(c)	Describe the risks of modern slavery practices in the operations and supply chains	Section 2 — Risks of Modern Slavery in Our Operations; Risks of Modern Slavery in Our Supply Chain
(d)	Describe the actions taken by the reporting entity to assess and address those risks	Section 2 — Actions Taken to Assess and Address Modern Slavery Risks (Policies, Training, Risk Assessment and Due Diligence, Remediation, Continuous Improvement)
(e)	Describe how the reporting entity assesses the effectiveness of such actions	Section 3 — Assessing the Effectiveness of Our Actions; Effectiveness Indicators and KPIs
(f)	Describe the process of consultation with any entities owned or controlled by the reporting entity	Section 2 — Consultation Process
(g)	Include any other information that the reporting entity considers relevant	Throughout this Statement

4. Finalisation and Approval

This statement was approved by the principal governing body of the Avis Budget Group as defined in the Modern Slavery Act 2018 (Cth), on 25 June 2026.

This statement is signed by a responsible member of the principal governing body and a director of the reporting entity, in accordance with section 13(2)(c) of the *Modern Slavery Act 2018 (Cth)*.



Eric Johnston

Senior Director of Finance, Pacific
Avis Budget Group

Date: 25 June 2026

Note: This Statement will be submitted via the online Modern Slavery Statement Register on or before 30 June 2026, in accordance with section 13(1) of the Modern Slavery Act 2018 (Cth).