

Modern Slavery Statement 2025

Table of Contents

1. Introduction	2
2. About our business	3
3. Servco Australia value chain	4
4. Actions taken to identify and mitigate modern slavery risks in Operations and in Supply Chains	5
Risks in our Operations	6
Risks in our Supply Chain	9
5. Review of the Effectiveness of our Actions and Planned Actions.....	10
Appendix 1 – Schedule of Reporting Entities.....	12
Appendix 2 – Compliance Statement.....	13



1. Introduction

Servco Australia Pty Ltd ABN 16 123 482 717 presents this joint Statement in conjunction with the entities controlled by it herein collectively referred to as **Servco Australia, “us”, “our”**. The controlled entities are listed in Appendix 1.

This Statement outlines the ongoing efforts and actions taken during the reporting period of **1 January 2025 to 31 December 2025** to identify, assess and mitigate modern slavery risks in our business operations and supply chain.

This Statement has been prepared after consultation with the entities controlled by Servco Australia and with internal stakeholders across Servco Australia representing the functions of Human Resources, Finance, Sustainability and Risk, Operations and senior leaders.

Approval

This Statement was approved by the Directors of Servco Australia on 24 June 2026 in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

On behalf of the Board,



Nicholas Pappas
Director

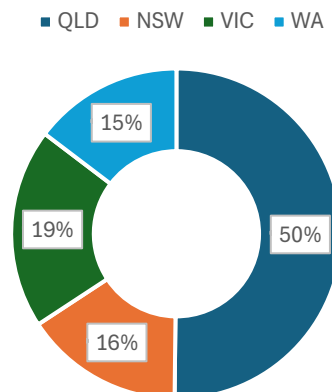
2. About our business

Servco Australia is a subsidiary of Servco Pacific Inc. (**SPI**), a privately owned Hawaii-based automotive products and services corporation with global operations across the United States of America, Australia and Europe. SPI was established in 1919 growing to become one of Hawaii's largest family-owned businesses while remaining deeply rooted in the values and communities that shaped us.

Expansion into Australia and the establishment of Servco Australia occurred in 2007 with the acquisition of Downtown Toyota in Brisbane. Since 2007, Servco Australia has grown to become one of Australia's leading automotive retailing groups. During the reporting period, we incorporated 30 separate entities and employed over 2,100 people across our 45 dealerships and service centres nationwide:



Employee distribution by State



Dealership distribution across Australia

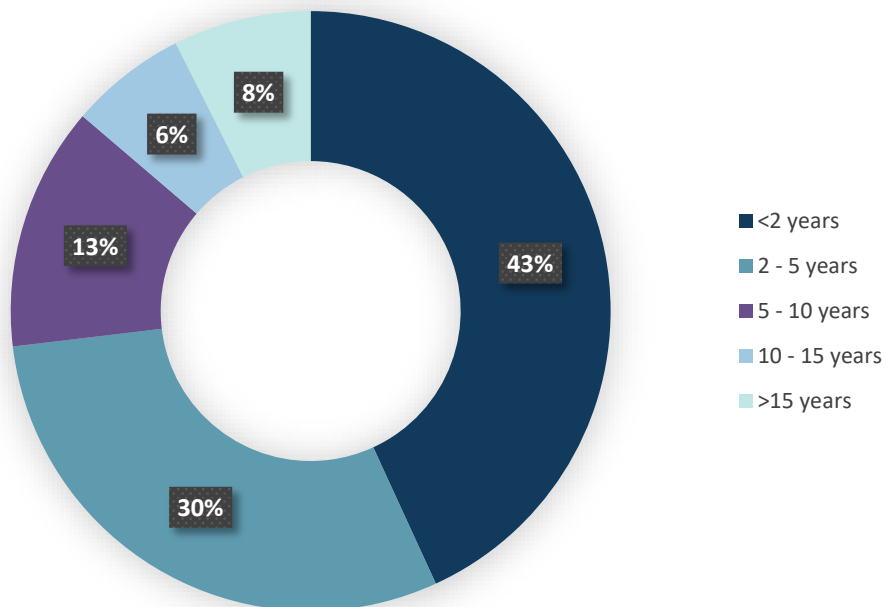
Our values are reflected in the way each and every one of us conducts business every day. Doing the right thing is an important part of our value-driven business model. We believe in having the right people doing the right things. Our company values are:



Our people are at the heart of our business, and we have worked hard to establish a culture of respect and value for our people. We are proud of our rapid growth and of the opportunities that our business offers to our dedicated workforce. The tenure of our workforce reflects our position as an employer of choice in a highly competitive industry as well as the opportunities afforded to

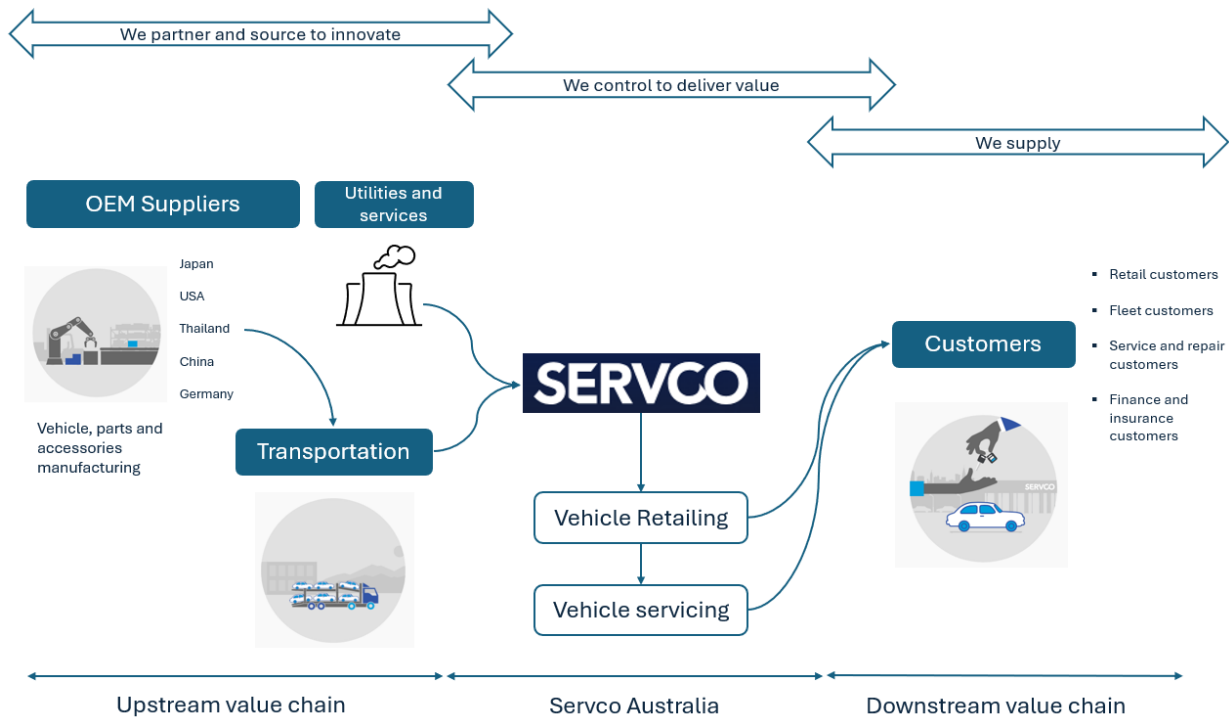
new employees across our business, from people starting their careers as apprentices through to senior executives tasked with the delivery of corporate strategy.

Employee tenure



3. Servco Australia value chain

We work closely with our Original Equipment Manufacturers (**OEM**) partners to source new vehicles and spare parts for vehicle servicing. In addition, we source and retail used vehicles and offer related services including vehicle insurance, vehicle service and maintenance, vehicle aftermarket installation and finance.



Servco Australia value chain

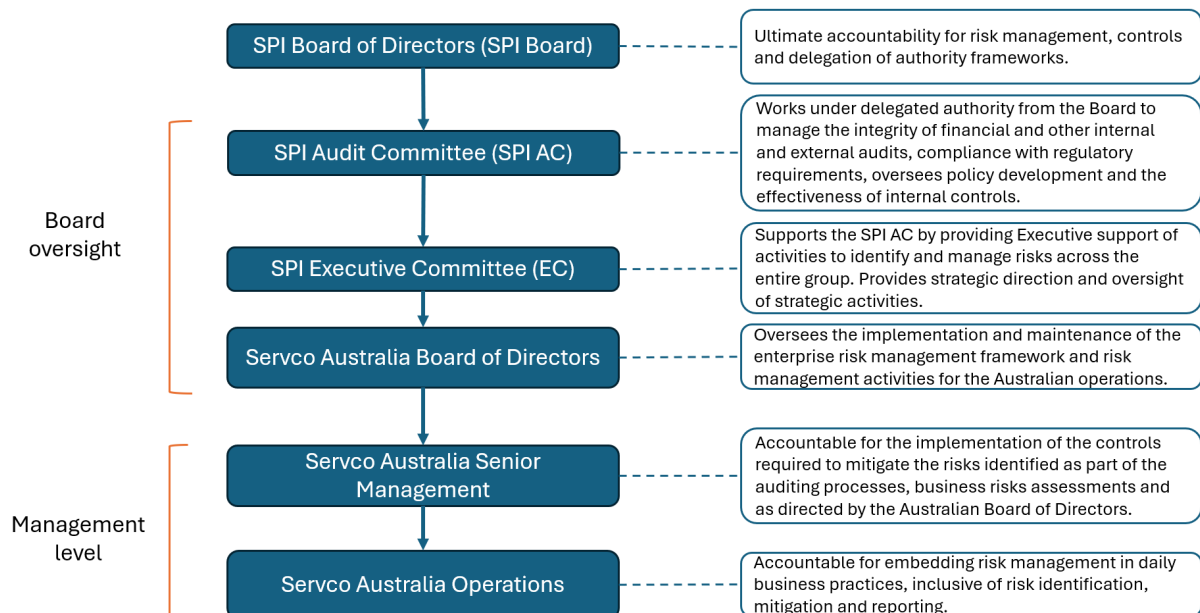
Our value chain incorporates the supply of vehicles and parts by OEMs from manufacturing facilities in Japan, USA, Thailand, China and Germany. Consequently, our largest categories of value chain expenditure are centred on the purchase of new and used vehicles, vehicle parts and outsourced services that support vehicle retailing including property maintenance and management, security and insurance. Our long-term supply arrangements with our OEM partners, landlords and financiers have allowed us to position our business favourably to identify and mitigate potential risks associated with modern slavery.

4. Actions taken to identify and mitigate modern slavery risks in Operations and in Supply Chains

Servco Australia acknowledges the importance of identifying and mitigating modern slavery risks in our value and supply chains and we remain vigilant of these risks. We recognise that operating in a globalised supply chain introduces risks and requires strong governance structures to ensure that we can maintain the integrity of our operations in line with our values.

The Servco Board of Directors (SPI Board) maintains accountability for overseeing the implementation of suitable controls to mitigate business risks across all operations globally. This is inclusive of the review of enterprise risks, strategic priorities and long-term planning. The Board

of Directors has delegated authority to the SPI Audit Committee to implement an enterprise risk management framework and corporate governance. Our risk management structure has allowed us to develop the processes and tools to identify, quantify and report on business risks, including modern slavery risks. Our risk management structure supports collaboration across different levels of our organisation to embed risk management practices in day-to-day operations. The risk management structure across our business operations is as follows:



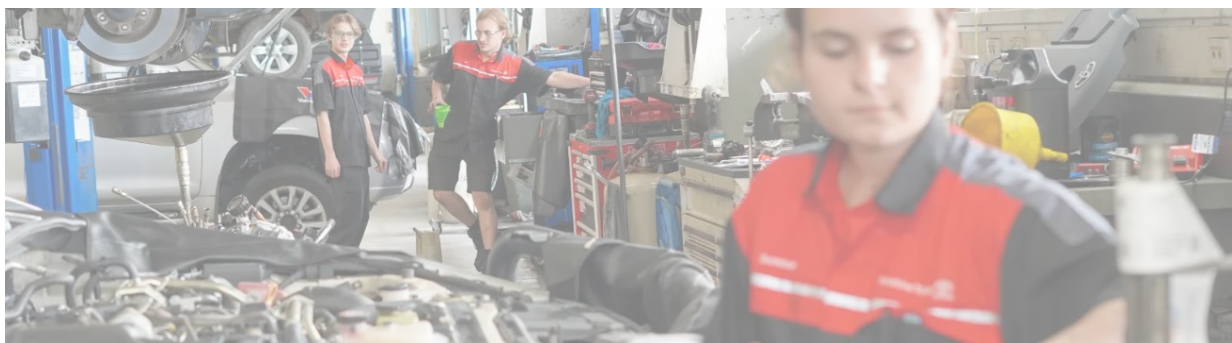
Risks in our Operations

We acknowledge that the automotive industry is exposed to modern slavery risks associated with complex supply chains, the extraction of raw materials, parts and vehicles manufacturing and assembly and in dealerships and associated services. We consider that the risk of modern slavery in our own employees is low. Our employees are in Australia and employed under individual employment contracts. All our employees are remunerated in accordance with industry awards exceeding minimum wages.

We have assessed the modern slavery risks in our own operations and have established controls in accordance with our risk management framework. The risks identified in our operations are summarised below.

Aspect	Description of the risk	Mitigating actions
Offshore service providers	- Offshore service providers provide professional services through contractors based overseas. - Offshore workers can be vulnerable to modern slavery practices, particularly in regions where employment laws are not adequately enforced.	- Establishment of contractual obligations with offshore service providers to protect workers from exploitation and the compliance with employment laws and international labour standards. - Completion of due diligence assessments of practices of offshore service providers through onsite audits completed by Servco Australia delegates.
Compliance with labour standards and minimum salary expectations	The inadequate understanding or labour standards and of the legal framework that protects workers could lead to the exploitation of workers, particularly vulnerable workers.	- We have a dedicated Human Resources (HR) department that supports with the development and implementation of policies and processes designed to meet employment law requirements and labour standards. - Our HR department supports our payroll department to ensure that our people are paid in accordance with the relevant awards. - We review salaries against the industry awards at minimum on an annual basis.
Migrant workers	Migrant workers could be at risk of exploitation due to their vulnerability or misunderstanding of employment regulations and their rights under Australian employment laws.	- We work with registered migration agents when we require to fill a vacancy with migrant workers. - We have established processes to verify the working rights of migrant workers. This is inclusive of holders of temporary visas. - We monitor the validity of visas through our HR Information System and in accordance with our HR and Privacy Policies. - The process to engage migrant workers is supported by specialist immigration lawyers.
Employment conditions	Inadequate employment conditions can lead to the exploitation of vulnerable workers, particularly if a comprehensive policy framework is not adequately implemented and embedded in the operational culture of an organisation.	- We have a centralised HR department as well as HR teams based across our dealerships to support operations across the group. - We have developed and implemented policies including Remuneration and Benefits, Recruitment and Onboarding, Equal Employment Opportunity, Workplace Behaviours & Culture, Bullying, Harassment & Discrimination, Whistleblower and Modern Slavery Policies. We have a confidential whistleblower service available to every employee to raise concerns anonymously.

Aspect	Description of the risk	Mitigating actions
		- These policies are readily available and are provided to every employee at the commencement of their employment. - Our processes support ongoing reviews of employee performance and discussions between leaders and their direct reports to identify and resolve any issues related to employment conditions. - We monitor continuous working hours and manage risks related to fatigue closely.
Facilities Management and contracted services	- The use of leased facilities could introduce risks, particularly from inherent risk areas involving construction and the supply of materials for construction, and the ongoing engagement of maintenance service providers. - The inadequacy of controls in the service sector could introduce modern slavery risks to employees offering cleaning, hospitality and maintenance services, particularly if migrants are employed to offer these services.	- Selection of reputable contractors through adequate procurement processes and the engagement of reputable landlords and property managers. - We use the same Health and Safety Management System (HSMS) across our sites which allow us to uniformly manage contractors performing work at our operational sites. - Through the HSMS we can communicate policies, induct contractors, check licences and the qualifications of contractors working at our sites.
Procurement of services	Inadequate controls in procurement processes could lead to the introduction of indirect funding of modern slavery in our supply chain.	- We have implemented procurement policies to manage the assessment of suppliers that support the financial services offered by the group. - We work with reputable service providers who are aligned with our company values. - Our suppliers are provided copies of our policies to ensure alignment and compliance with our requirements.



Risks in our Supply Chain

We acknowledge that our most prominent risks are in the international production of motor vehicles and parts by our OEM partners. As part of our efforts to identify the exposure of our supply chains to modern slavery, we assessed the potential areas of risk across our supply chain. The risks identified are discussed below:

Aspect	Description of the risk	Mitigating actions
Vehicle and parts manufacturing, including materials sourcing	Manufacturing is inherently a sector vulnerable to modern slavery, particularly if manufacturing activities are conducted in locations where forced labour exploitation could occur or where inadequate employment conditions may exist.	- Due diligence assessment of policies and anti-modern slavery commitments published by OEMs. - According to the commitments made by OEMs, efforts are made throughout their supply chains and in collaboration with their parent entities, to identify and mitigate modern slavery risks. OEMs have expressed strong commitments to eradicating modern slavery from their supply chains and acknowledged the regions that are likely to have a higher prevalence of modern slavery risks. - The approach taken by OEMs is centred around the establishment of committees that support the implementation of human rights policies and the mitigation of risks and support the work with suppliers to identify and mitigate risks. Efforts are dedicated to raising awareness and training their personnel in addition to the establishment of trading conditions with suppliers to support compliance with human rights policies. - Close relationships have been established with OEMs and information shared on best practice to manage risks across the supply chain.
Transportation	The transportation of vehicles, particularly when vehicles are transported by sea, can be an area of modern slavery risk as workers could be exposed to unfavourable work conditions.	- Establishment of close relationships with OEMs and logistics businesses to support the delivery of stock in a safe and efficient manner. - Increasing the efficiency of stock controls could reduce this risk by ensuring that stock is available just in time for delivery. - OEMs have established control mechanisms in line with their own policies and processes to manage the risks associated with the transport and logistics of parts and stocks from factories to ports prior to distribution to Australia.

5. Review of the Effectiveness of our Actions and Planned Actions

Servco Australia is committed to operating in an ethical and lawful manner in every aspect of our business. We expect this commitment to be applied uniformly across our value chain. In 2020, Servco Australia first published a Modern Slavery policy to establish a business culture of awareness and preparedness. This policy set the minimum requirements and expectations of every employee in relation to the identification of modern slavery risks. Our suppliers are required to comply with Modern Slavery legislative requirements. Our processes and practices have continued to mature since then. Our strategic direction and growth have been centred around the establishment of strong partnerships with major multinational automotive manufacturers that share similar corporate values.

In 2025, we focused on strengthening our centralised Human Resources function whilst supporting Human Resources personnel at each of our entities. We established central repositories of information to support the dissemination of information and policies across our group and to support a uniform approach to effective human resource management. This close collaboration enables the efficient and effective dissemination of information and the provision of support where required. Our focus on the wellbeing of our people was evidenced through the provision of confidential whistleblower mechanisms available to every employee working across any of our facilities. We did not receive any complaints or grievances during the reporting period.

In addition, our parent company Servco Pacific Inc., established a dedicated ESG (Environmental, Social, Governance) function to further develop our governance framework that supports transparency, efficiency and best practice across all our operations globally. This dedicated function will work closely with Servco Australia's Corporate Risk function to further incorporate human rights risk assessments in corporate risk assessments.

We have gone through a period of rapid growth anchored to a solid strategic plan. Our processes continue to mature as we expand our capabilities and strengthen our partnerships with our suppliers and OEM partners. Our focus during the reporting period was centred on the establishment of frameworks that supported our dealerships and the entities that are part of Servco Australia in the establishment of best practice in automotive retailing.



In 2026, our focus will be centred on building on the strong foundations we have set through the delivery of the following:

	Inclusion of Modern Slavery management objectives as part of the 2026 ESG Strategy for the Australian operations.
	Development and rollout of a supplier questionnaire to support with due diligence assessments and the identification of risks in our supply chains.
	Rollout of awareness and knowledge campaigns developed for senior management.
	Inclusion of HR personnel in the Australian Sustainability Working group to further strengthen strategic alignment across operations in Australia and globally.
	Review and rollout of a revised Modern Slavery Policy as part of our continuous improvement processes.

Appendix 1 – Schedule of Reporting Entities

1. Servco Australia Automotive Pty Ltd
2. Servco Australia Automotive Unit Trust
3. Servco Australia Chatswood Unit Trust
4. Servco Australia Echuca Unit Trust
5. Servco Australia Echuca No 2 Unit Trust
6. Servco Australia Morningside Pty Ltd
7. Servco Australia Dubbo Pty Ltd
8. Servco Australia Caloundra Pty Ltd
9. Servco Australia Cairns Pty Ltd
10. Servco Australia Melbourne City Pty Ltd
11. Servco Australia Melbourne Prestige Pty Ltd
12. Servco Australia Melville Pty Ltd
13. Servco Australia Tamworth Pty Ltd
14. Servco Australia Essendon Fields Pty Ltd
15. Servco Australia Finance Pty Ltd
16. Servco Australia Solutions Pty Ltd
17. SAC2 Pty Ltd
18. Servco Australia Motorama Investments Pty Ltd
19. Servco Australia Motorama Holdings Pty Ltd
20. Servco Australia Motorama Moorooka Pty Ltd
21. Motorama Moorooka Pty Ltd
22. MHPL Investments Pty Ltd
23. Motorama Hillcrest Pty Ltd
24. Auto Wholesale Vehicles Pty Ltd
25. Motorama Automotive Pty Ltd
26. Motorama Springwood Pty Ltd
27. Motorama Management Pty Ltd
28. MHM Automotive Pty Ltd
29. Big Box Holdings Pty Ltd
30. MB Superstore Pty Ltd

Appendix 2 – Compliance Statement

Section 16 of the *Modern Slavery Act 2018* (Cth) outlines the mandatory criteria modern slavery statements must address. The table below outlines how Servco Australia has met the mandatory reporting criteria with this Statement.

Requirement	Section and page
a. Identify the reporting entity.	Section 1 and 2, pages 2-4
b. Describe the structure, operations, and supply chains of the reporting entity.	Section 2 and 3, pages 3-5
c. 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.	Section 4, pages 5-9
d. 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.	Section 4, pages 5-9
e. Describe how the reporting entity assesses the effectiveness of such actions.	Section 5, page 10
f. Describe the process of consultation with any entities that the reporting entity owns or controls.	Section 1, page 2
g. Include any other information that the reporting entity considers relevant.	Section 2 and 5, pages 3-4, 11

