

Modern Slavery Statement 2023

Reporting Period

This Modern Slavery Statement sets out the steps taken by the Company in the reporting period 1 January 2023 to 31 December 2023 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 2023 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 2023, Pamsim Pty Ltd's financial year end, the company employed 106 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 9848 8901 F 03 8872 8872 F 03 8872 8877

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





Modern Slavery Risks in Supply Chains and 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 all of our staff are employed and remunerated under Federal and Victorian State Awards, adhering to Fair Work Act minimum standards, and state legislation. Pamsim Pty Ltd also works directly with the Department of Home Affairs on any skilled migrant labour intake within the prescribed legislative framework.

Actions to Assess and Address Modern Slavery Risks

The online Contractor / Service Provider prequalification and induction system mentioned in the 2022 Modern Slavery report is now operational. Prior to commencing work with the company, potential contractors must report on their compliance with a range of legislative and regulatory frameworks. A component of the prequalification questionnaire asks if the contractor / supplier is obligated to report under the Modern Slavery Act (Cth) 2018, and if so, requires them attach a copy of their Modern Slavery Statement. An audit of contractor pregualification questionnaires indicated that most are not required to report under Modern Slavery Act (Cth) 2018.

Pamsim Pty Ltd continues to review and update its people management policies and associated documents. 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.

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As stated previously, Company policies to encourage ethical behaviour and promote compliance with modern slavery and human rights protections are reviewed annually.

The polices reviewed during 2023 included:

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

From a people management perspective, the annual Minimum Wage Case (MWC) review was completed in July 2023. This review ensured all employees receive at least the minimum base award rate of pay and took into account recent minimum award adjustments determined by the Fair Work Commission. In addition, quarterly audits of employee salaries and payments were undertaken throughout 2023 to ensure 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.

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

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.

We will continue to assess the effectiveness of our actions to identify and eliminate modern slavery risks by: continuing to conduct 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 statutory obligations.

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Approval

This statement was approved by the board of Pamsim Pty Ltd in their capacity as principal governing body of Pamsim Pty Ltd on 17 June 2025

This statement is signed by Brett Jefferson in his role as CEO and Director of Pamsim Pty Ltd on 17 June 2025

Brett Jefferson

CEO and Director Pamsim Pty Ltd

17 June 2025

