



**Modern Slavery Statement
2025**



About This Statement

Bapcor is pleased to present the FY25 Modern Slavery Statement (**Statement**).

This Statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the '**Act**'). It outlines the steps Bapcor Limited (ABN 80 153 199 912) and our related bodies corporate (as defined in the *Corporations Act 2001* (Cth) (together '**Bapcor**') have taken to assess and address the risk of modern slavery in our operations and supply chain during the financial year ending 30 June 2025 (**FY25**).

Unless otherwise noted, statistics and other data in this Statement are current as at 30 June 2025

This Statement is provided in consultation with Bapcor's reporting entities and other entities owned or controlled by these reporting entities:

- Bapcor Limited
- Bapcor Finance Pty Ltd
- Aftermarket Network Australia Pty Ltd
- Bapcor Retail Pty Ltd
- Specialist Wholesalers Pty Ltd
- Burson Automotive Pty Ltd
- JAS Oceania Pty Ltd

Consultation to develop the Statement was led by Bapcor's Environmental, Social and Governance (**ESG**) Manager and occurred in a range of forms, including through the Modern Slavery Working Group (**Working Group**), who have responsibilities across each of the reporting entities, as well as relevant owned or controlled entities.

Bapcor's ESG Manager also consulted with relevant teams and functions, including Group Procurement and Finance. The Statement was reviewed by the Remuneration and ESG committee (**Committee**), which oversees ESG risk matters such as modern slavery across Bapcor.

This Statement was approved by Bapcor's Board, as the principal governing body of Bapcor Limited, defined by the Act on behalf of all reporting entities on 17 December 2025 and is signed by a member of that body.



Lachlan Edwards
Chair

17 December 2025

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A Message from Bapcor's Chief Executive Officer

Like many businesses, Bapcor is alert to modern slavery risks. We are committed to addressing these risks within our operations and supply chains and take seriously our responsibility to respect internationally recognised human rights.

We also comply with domestic laws relating to modern slavery and other applicable human rights.

This commitment is core to our broader ESG Strategy and Strategic Framework. We support the Ten Principles of the United Nations Global Compact (**UNGC**).

In line with our continuous improvement approach, we took important steps to strengthen our modern slavery program over the last financial year.

These included:

- Significantly increasing the number of suppliers onboarded to our third-party supplier risk assessment platform to cover approximately 65% of our supplier spend.
- Deepening our engagement with suppliers assessed as potentially higher risk for modern slavery, including through a targeted due diligence review of 31 higher risk suppliers.
- Continuing to proactively engage with our peers through the UN Global Compact Network Australia's (**GCNA**) Modern Slavery Community of Practice and the Australian Automotive Aftermarket Association (**AAAA**) Modern Slavery Consortium.

We have clear plans to expand and refine our program in the coming years, including further strengthening our supplier risk assessment and due diligence processes, refining a methodology to support targeted and consistent engagement with higher risk suppliers, and implementing an audit program.

We are also monitoring the Australian Government's proposed changes to the Act and look forward to engaging in the Government's consultation process, including through the GCNA Modern Slavery Community of Practice.



Our Modern Slavery Risk Management Approach

Our Code of Conduct's 'Guiding Principles' highlight our approach to treating people with respect and acting ethically and responsibly. This includes making decisions that uphold human rights.

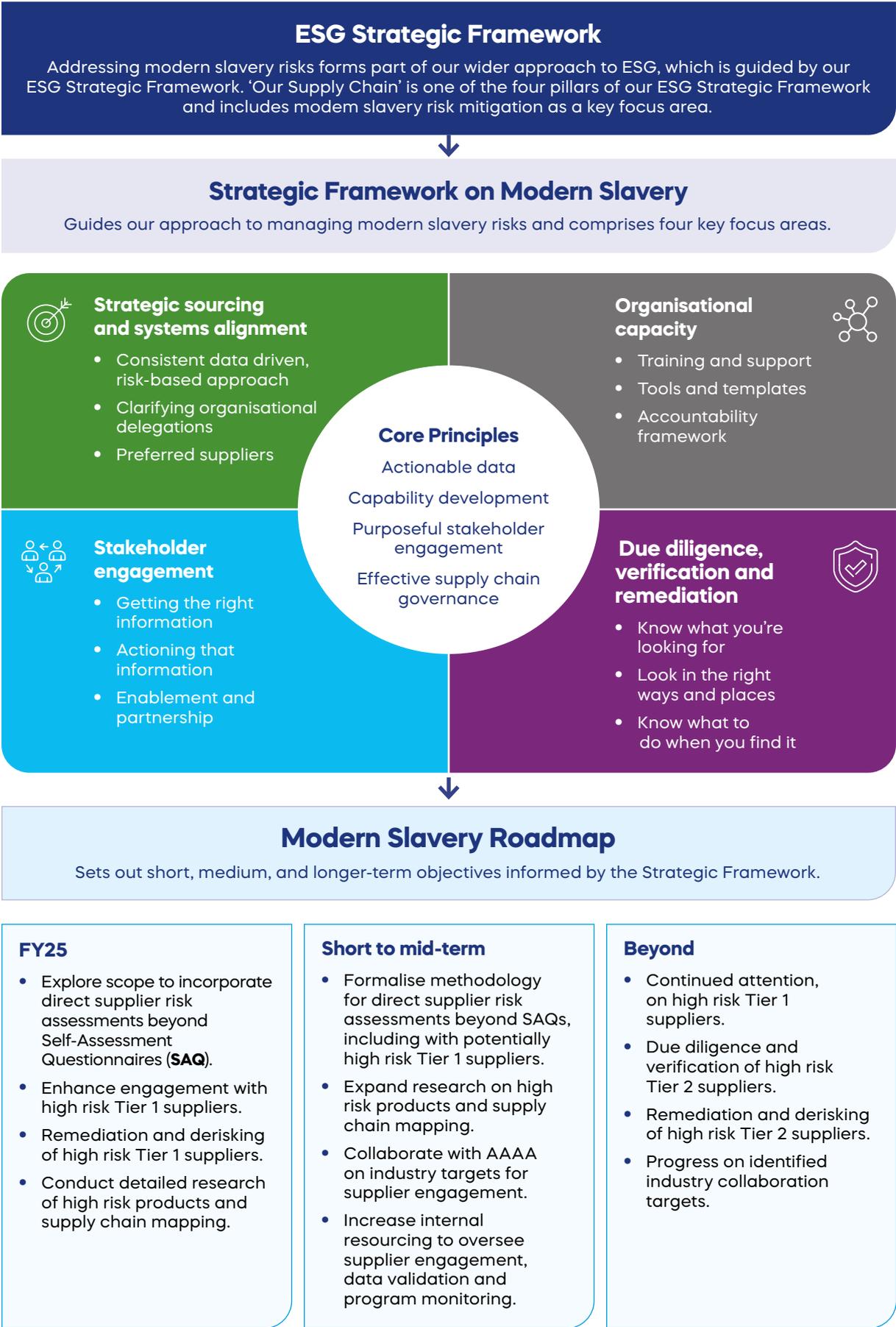
As set out in this Statement, we take a targeted, risk-based approach to addressing modern slavery risks across our operations and supply chains.

Our approach aims to increase our understanding of modern slavery risks, maximise our impact and support continuous improvement, while making the best use of our resources and capacity.

Our Strategic Framework on Modern Slavery and Modern Slavery Roadmap underpin our program.



Figure 1: Bapcor’s Strategic Framework on Modern Slavery



Our FY25 Achievements

Guided by our Strategic Framework and Modern Slavery Roadmap, we delivered well against targets across each of our focus areas in FY25.



FOCUS AREA 1

Strategic sourcing and systems alignment

- Undertaking a targeted assessment of modern slavery risks across five direct spend procurement categories to enhance our understanding of potential risks in these areas and opportunities to strengthen our risk management.
- Trialling a new 'balanced scorecard' scoring system for Supplier SAQ responses to promote greater consistency across AAAA Modern Slavery Consortium members in assessing responses and better triaging suppliers for further engagement.



FOCUS AREA 2

Organisational capacity building

- Launching a refreshed modern slavery online training module and reinstating a two-year completion cycle for relevant team members to complete.
- Participating in an academic case study exercise on remediating modern slavery in supply chains.



FOCUS AREA 3

Stakeholder engagement

- We increased the total number of suppliers onboarded to the AAAA platform from 234 to 354, exceeding our target of a 30% increase. Our total number of onboarded suppliers represents approximately 65% of our total supplier spend.
- Over the reporting period, we supported and actively participated in AAAA Modern Slavery Consortium meetings.



FOCUS AREA 4

Due diligence, verification and validation

- We further matured our risk assessment methodology by undertaking a due diligence review of 31 higher risk suppliers, including meeting directly with 13 suppliers to better understand their modern slavery risk profile.

Our Structure, Operations and Supply Chains

As one of Asia Pacific's leading providers of vehicle parts, accessories, equipment, service and solutions, we operate in key countries across our region and draw on an extensive international supply chain, with many of our Tier 1 suppliers¹ concentrated in Asia.

Our structure and operations

Our business



We operate in Australia, New Zealand and Thailand through

40+

subsidiaries across four business segments (see next page).



We employ approximately

5,100

team members (90% based in Australia; 9% based in New Zealand; and about 1% based in Thailand).



Approximately

4,000

of our Australian and New Zealand team members are full time with the remainder being part time/casual.



Bapcor has

698

sites in Australia, 198 sites in New Zealand, and seven sites in Thailand.



We have a diverse customer footprint and sell to independent mechanics, national chains and service centres, and to businesses and consumers through our retail business.



Bapcor's headquarters is in Melbourne; we are listed on the Australian Securities Exchange (ASX: BAP).

1. Tier 1 suppliers refers to suppliers we have a direct contractual relationship with.

Our business is structured across four segments. In FY25, a large component of our revenue (70%+) was derived from our Trade and Specialist Wholesale segments.

Bapcor Trade

Australia's leading distributor of vehicle parts and equipment solutions to Trade customers. It consists of the Burson Auto Parts, Precision Automotive Equipment, Brookers and Brakeforce and Blacktown Auto Spares in Australia, as well as a footprint in Thailand. This segment is a distributor of:

- Automotive aftermarket parts and consumables to trade workshops for the service and repair of passenger vehicles.
- Automotive workshop equipment such as vehicle hoists and scanning equipment, including servicing of the equipment.
- Automotive accessories and maintenance products to do-it-yourself vehicle owners.



Bapcor Retail

One of Australia's leading full-offer automotive retailer and workshop service centre provider, our Retail segment includes the Autobarn and Autopro brands, plus the Midas and ABS workshop service brands. This segment is comprised of mostly company-owned stores in the Autobarn channel, with predominately franchised stores and workshops across the other brands.



Bapcor Specialist Wholesale

Our Specialist Wholesale segment is a leader in the truck, electrical and specialist wholesale markets; and acts as aggregator and importer for Bapcor. It consists of the Specialist Networks business being Commercial Vehicle Group (CVG, comprising Truckline and WANO), and the auto electrical business JAS (comprising JAS Oceania, Baxters and Federal Batteries), as well as the Wholesale business, which is a leader in automotive aftermarket wholesale operations through brands such as AAD, Bearing Wholesalers, Roadsafe and Premier Auto Trade. This segment is being renamed to Bapcor Networks from FY26.

Wholesale

Specialist Networks



Bapcor New Zealand

Bapcor New Zealand is a leading integrated trade and specialist wholesale group providing aftermarket parts and equipment solutions. The group consists of Brake & Transmission (BNT), which is a primary supplier of automotive parts and accessories to workshops, Autolign, which specialises in undercar steering and suspension, and wholesale businesses including HCB Technologies (batteries), JAS Oceania NZ (auto electrical components), and Precision Equipment NZ (automotive workshop equipment). The licensee network features Battery Town, New Zealand's largest network of automotive electricians; as well as Battery Town Marine and the Shock Shop, among the largest specialist steering and suspension networks in the country.



Our supply chains

We are a supply chain-driven business, relying on an extensive network of global suppliers. We source a diverse range of goods and services from both direct and indirect Tier 1 suppliers.

Direct suppliers

Suppliers providing goods via domestic and global supply chains for resale to customers. This includes products sold under market brands, as well as own brand products mostly sourced direct from overseas manufacturers and sold under Bapcor owned brands.

Key direct supplier categories²

- Batteries
- Bearings and driveline
- Braking
- Car accessories
- Electrical
- Engine and engine management
- Equipment
- Oil, coolants and filtration
- Suspension, steering and 4WD
- Thermal and cooling
- Tools

Indirect suppliers

Suppliers we contract for products and/or services that support our day-to-day operations.

Key indirect supplier categories³

- Transport and logistics
- Facilities management
- Marketing
- Information technology
- Human resources
- Equipment and construction
- Commercial and professionals
- Travel
- Utilities

2. The list below shows our key categories by spend and is not intended as a list of higher risk categories from a modern slavery perspective.

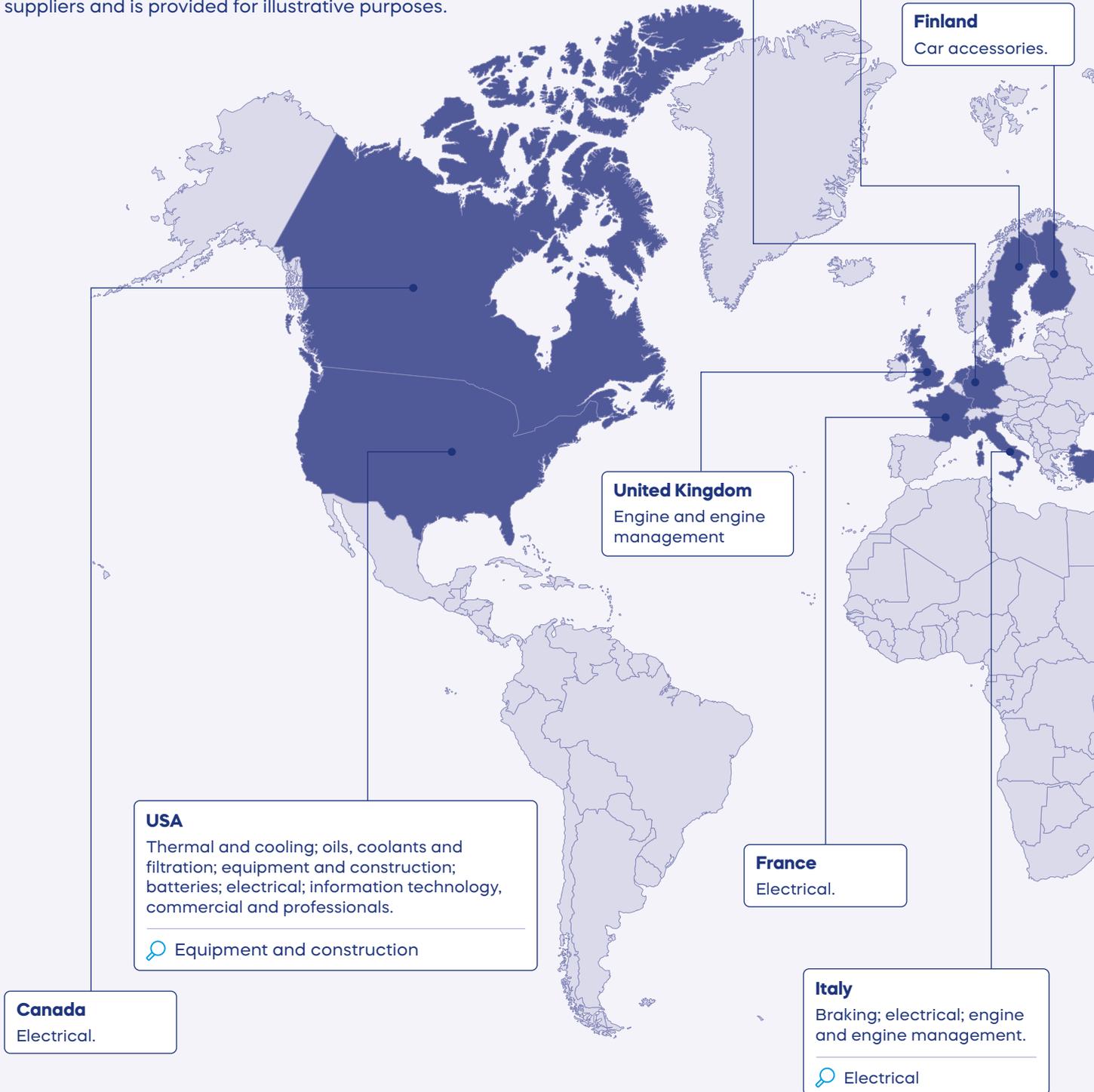
3. The list below shows our key categories by spend and is not intended as a list of higher risk categories from a modern slavery perspective.



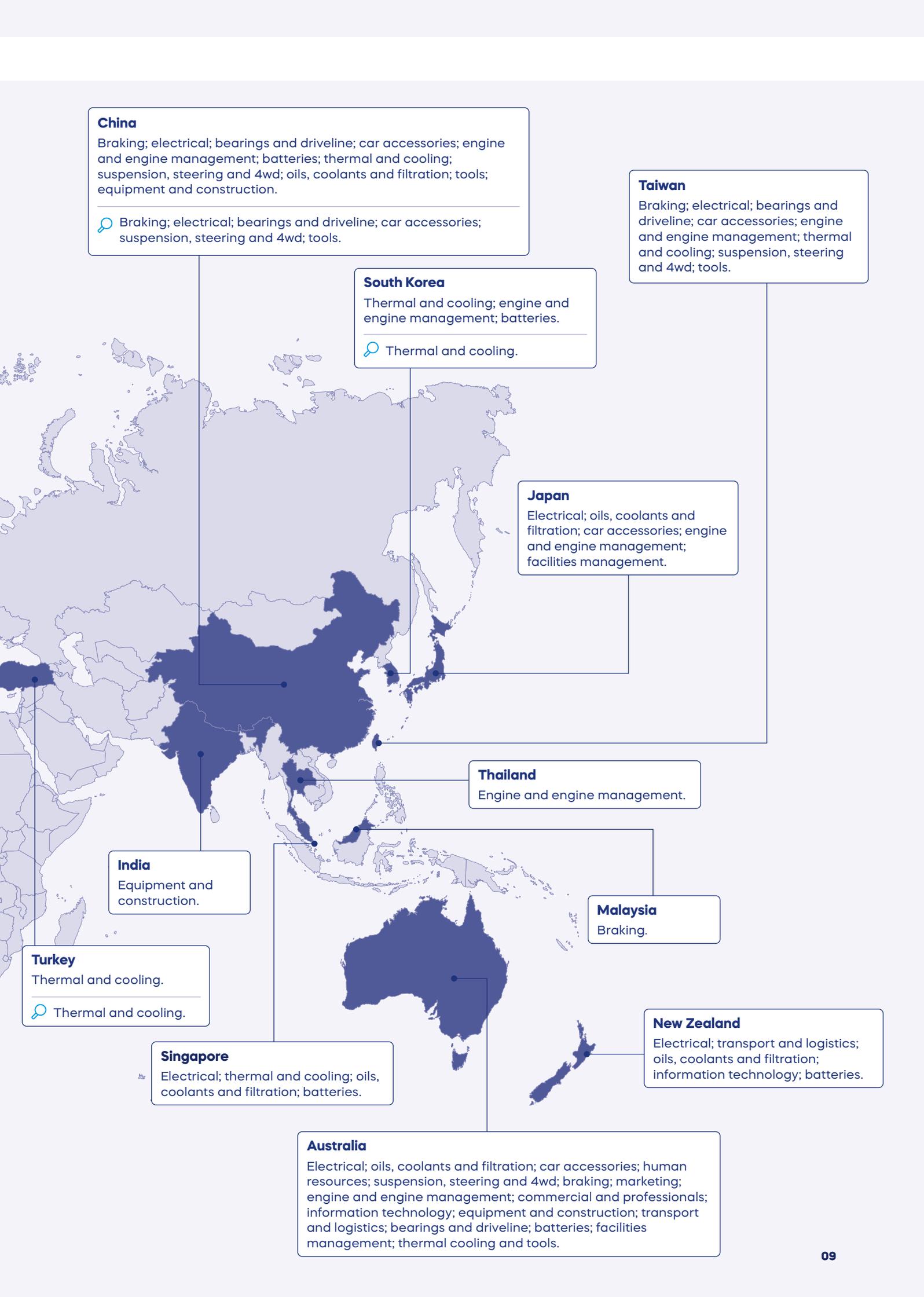
Our Global Sourcing Footprint

The map below is based on data from the 223 suppliers across our direct and indirect sourcing footprint that completed the SAQ through the AAAA platform in FY25.

It shows the countries these suppliers identified as their headquarters location. We recognise these suppliers may also operate in or source from other countries. The map is not an exhaustive representation of all Bapcor suppliers and is provided for illustrative purposes.



🔍 Indicates Bapcor conducted a targeted assessment during the reporting period of one or more higher risk suppliers headquartered in this country.



China

Braking; electrical; bearings and driveline; car accessories; engine and engine management; batteries; thermal and cooling; suspension, steering and 4wd; oils, coolants and filtration; tools; equipment and construction.

 Braking; electrical; bearings and driveline; car accessories; suspension, steering and 4wd; tools.

Taiwan

Braking; electrical; bearings and driveline; car accessories; engine and engine management; thermal and cooling; suspension, steering and 4wd; tools.

South Korea

Thermal and cooling; engine and engine management; batteries.

 Thermal and cooling.

Japan

Electrical; oils, coolants and filtration; car accessories; engine and engine management; facilities management.

Thailand

Engine and engine management.

India

Equipment and construction.

Turkey

Thermal and cooling.

 Thermal and cooling.

Malaysia

Braking.

Singapore

Electrical; thermal and cooling; oils, coolants and filtration; batteries.

New Zealand

Electrical; transport and logistics; oils, coolants and filtration; information technology; batteries.

Australia

Electrical; oils, coolants and filtration; car accessories; human resources; suspension, steering and 4wd; braking; marketing; engine and engine management; commercial and professionals; information technology; equipment and construction; transport and logistics; bearings and driveline; batteries; facilities management; thermal cooling and tools.

Our Modern Slavery Risks



Our most significant exposure to modern slavery risks is through our supply chains. As outlined below and in the following section of this Statement, we have implemented a range of actions to assess and manage these risks.

Operations risks

Our assessment is that the risks of modern slavery in our own operations are moderate. This reflects the nature and demographic of our workforce, the controls we have in place, and the context in which we operate. Importantly, our Code of Conduct highlights our commitment to carrying out business ethically and responsibly and in alignment with our values and relevant laws and regulations. We also have a strong focus on the health, safety and wellbeing of all our team members.

Our workforce is primarily located in Australia and New Zealand, which are reported to have a comparatively low prevalence of modern slavery.⁴ Our staff in Thailand are all Australian or Thai.

During the reporting period, an expert third party supporting us with our modern slavery program visited our operations in Thailand and met with the General Manager. The meeting included a discussion of Bapcor's modern slavery risk management approach and the Thai context, including in relation to engaging with suppliers.

We expect our franchisee stores (who recruit and employ their own staff or contractors) to share our values, and our franchise agreements include a positive obligation on our franchisees to comply with all applicable laws.

Supply chain risks

We draw on complex supply chains to source goods and services, many of which involve an extensive international footprint. Modern slavery risks can arise where these supply chains involve:

- Country risks: Production or manufacturing in higher risk geographies where modern slavery is reportedly more prevalent.
- Industry risks:
 - Reliance on workers who may be more vulnerable to exploitation, such as lower skilled migrant workers in manufacturing and other roles.
 - Use of higher risk materials, which in the automotive parts sector may include steel, aluminium, copper and electronics components.
 - Complex supply chains which make it difficult to trace key materials.

To date, we have focused our modern slavery program on risks associated with our direct procurement (goods for resale). However, we also recognise that across the Australian retail sector, modern slavery risks could occur in our indirect procurement supply chains (goods and services not for resale), such as facilities management, information technology, and transport and logistics. Where relevant, we seek to consider risks around our indirect suppliers through the risk assessment process outlined below.

4. See for example, the Walk Free Global Slavery Index 2023.

Our supply chain risk assessment process

We take a supplier specific approach to assessing modern slavery risks in our supply chain. Our primary risk assessment tool is the SAQ platform developed in partnership with the AAAA Modern Slavery Consortium. This platform enables us to consider relevant suppliers' inherent and residual modern slavery risks. The visual on page 14 summarises our supplier risk assessment and broader due diligence process.

We assess inherent risk with reference to the supplier's headquarters location (recognising this may be different to the locations where they source or manufacture) and primary industry. We acknowledge that assessing risk based on industry type and country of headquarters is a helpful but limited starting point and we are actively working to improve our visibility of actual manufacturing and sourcing locations. This includes undertaking direct 1-1 engagement with selected higher risk suppliers (see page 17) and undertaking a risk review of selected higher risk procurement categories which considered likely sourcing regions (see page 11).

Following the inherent risk assessment, we are then able to assess residual risk by analysing suppliers' SAQ responses, including in relation to their systems, policies and processes, and governance related to modern slavery. We also gather key supplier details, including details of their own hiring arrangements, and sourcing countries.



Assessing Country Risk

In evaluating country risk, our methodology considers a range of factors, including armed conflict, climate change, democratic decline, retraction of women's rights and the lasting impacts of the pandemic. We also consider the prevalence of, and vulnerability to, modern slavery, as well as government responses in the supplier's headquarters location. This analysis is drawn from a range of sources including the Global Slavery Index, the Corruption Perceptions Index (produced by Transparency International), the Social Progress Index and the Global Peace Index (produced by Vision for Humanity).



Assessing Industry Risk

To assess industry risk, we use the Global Industry Classification System (GICS) to first categorise our suppliers and a set of indicators commonly associated with higher risk of modern slavery. These include high reliance on low-skilled work; reliance on a seasonal and/or migrant workforce; reliance on labour recruiters; and industry characteristics, such as supply chain capacity and complexity; and high levels of competitiveness with downward pressures on delivery times and wages. Our risk assessment also considers reports of modern slavery and other human rights violations in government and industry publications.

During the reporting period, the number of high risk suppliers identified through our risk assessment process increased (see page 16). Among other factors, this reflected a change to the third party country level risk rating in the AAAA platform from medium to high for a key sourcing country in our supply chain, including due to concerns related to reported state-imposed forced labour. Going forward, we are considering how we can most effectively undertake additional due diligence on this high risk supplier cohort, drawing on lessons learned from engagement with other high risk suppliers over the reporting period.

The increase in high risk suppliers may also be partly attributable to other drivers. These include our focus on onboarding certain supplier categories to the AAAA platform, including 'own brand' suppliers who may operate in or source from higher risk countries and so may be higher risk than some other supplier categories. The overall number of high risk suppliers is also likely to grow proportionately in line with the increase in the total number of suppliers onboarded.

Building our understanding of modern slavery risks in key procurement categories

In FY25, we worked with a specialist third-party organisation to deepen our understanding of modern slavery risks in five selected Bapcor procurement categories for goods for resale. This assessment involved a desktop review of potential modern slavery risks at both final manufacturing stage and the extended materials supply chain for each category. This review drew on credible data sources and third party reporting from governments, academia and civil society and considered Bapcor's indicative level of leverage with its suppliers in each category.

Among other findings, the review identified potential modern slavery risks in the automotive parts sector relating to practices such as debt bondage for migrant workers involved in manufacturing; the sourcing of key materials; and the concentration of supply chains in countries identified by third parties as higher risk for modern slavery.

In addition, Bapcor undertook a targeted analysis of high risk suppliers as identified by country and industry risk to start to better understand its supplier-specific potential modern slavery risks.

As a result of the third party specialist assessment findings and the targeted analysis of our supplier base, we have identified scope to strengthen our management of risks across these products and are in the process of developing targeted management approaches for each that will be introduced over the coming reporting cycles. Drawing on our learnings from these projects, this will include enhancing the questions we ask relevant suppliers and further tailoring the evidence we require from them.

How We Manage Modern Slavery Risks

We are focused on ensuring ethical and efficient sourcing, distribution, and logistics practices across our value chain. Our focus is on building and maintaining ethical relationships with suppliers, upholding high standards of transparency around our sourcing and labour practices, and maintaining an efficient supply chain network.

Our modern slavery risk management approach involves clear policies and governance structures, a targeted supplier due diligence approach, and collaboration and engagement with key stakeholders.

Policies and Governance

We have integrated responsibility for managing modern slavery risks into our governance structures, including assigning clear responsibilities for action. We have also developed tailored policies to support our modern slavery program, including our Human Rights Policy and Ethical Supply Chain/Procurement Policy.

Our Strategic Framework on Modern Slavery and Modern Slavery Roadmap underpin our approach to managing modern slavery risks. Within this framework, our Working Group is responsible for overseeing the day-to-day management of our modern slavery risks. The Working Group reports to the ESG Manager who is in turn accountable to the Bapcor Board and its Committee.

Established in 2021, the Working Group is chaired by our ESG Manager and is comprised of leaders from key business units, including General Managers, representatives from Bapcor's Legal, Product, Procurement and Supply Chain teams and key supplier Account Managers. The Working Group oversees Bapcor's participation in the AAAA Modern Slavery Consortium and is responsible for implementing our Modern Slavery Roadmap. In FY25, the Working Group met formally twice and communicated electronically during the course of the year to progress key actions. Relevant members also worked closely together out of session on specific initiatives.

All Bapcor team members have a role to play in supporting our modern slavery risk management program. We work to raise internal awareness of modern slavery and our program through an online training module on modern slavery for all people leaders (approximately 1000 team members). The online module was refreshed in the reporting period and we have begun a two-year training cycle with our team. Selected team members from our Procurement and Product teams also participated in an academic study on remediating modern slavery.



Key policy	Relevance to modern slavery	How we implement this policy
Human Rights Policy	Sets out our commitment to respect and promote human rights and identifies modern slavery as a key area of focus.	<p>All Bapcor team members, contractors and suppliers are expected to comply with the Policy. Actual or suspected breaches of the Policy can be reported through Bapcor's whistleblower mechanism.</p> <p>We reviewed the Policy during the reporting period to help ensure it remains fit for purpose (the Policy was first published in 2020 and is reviewed at Board level every two years).</p>
Ethical Supply Chain/ Procurement Policy	Sets out our expectations for suppliers to: <ul style="list-style-type: none"> • be aware of and, where relevant, compliant with modern slavery legislation; • not engage in forced, bonded, indentured or child labour and take reasonable steps to ensure there is no modern slavery in their supply chains; and • maintain appropriate oversight with respect to mitigating risks of modern slavery. 	<p>These requirements are embedded into our procurement templates and we are also working to update and renew existing supplier agreements. Where reasonably required by Bapcor, suppliers must provide evidence of their compliance with this Policy and Bapcor maintains the right to terminate dealings with suppliers that breach the Policy. The Policy is also available on Bapcor's internal intranet page.</p> <p>We reviewed the Policy during the reporting period to help ensure it remains fit for purpose (the Policy was first published in 2018).</p>
Code of Conduct	Sets out our ways of working with one another and includes our expectation that, among other things, our employees will comply with the law, our policies and procedures, and will act ethically and responsibly to respect human rights.	Hard copies of the Code are provided to all stores and the requirements in the Code are communicated to team members through training, roadshows and other forums as appropriate.

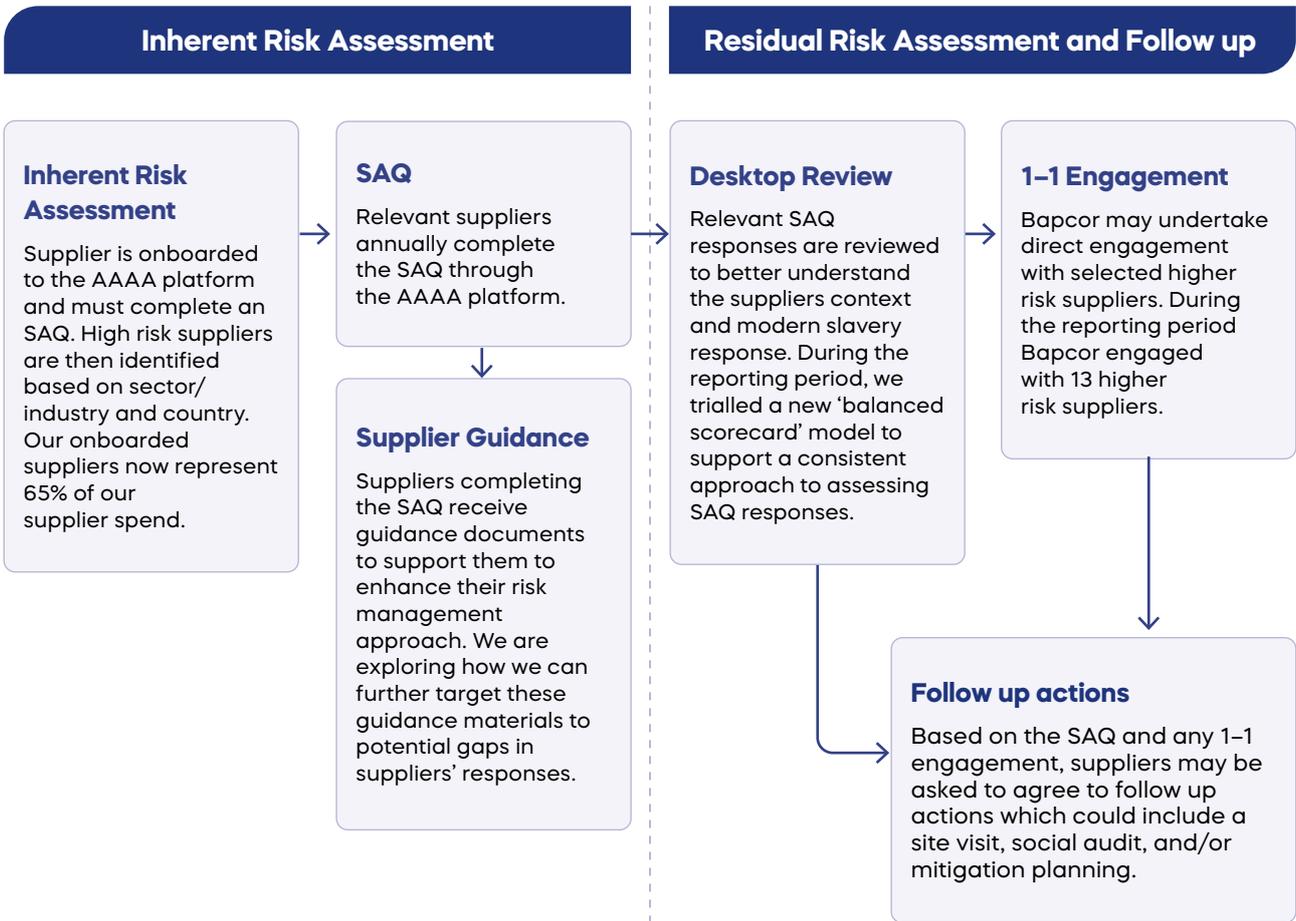
Supplier Due Diligence

Our supplier due diligence is the cornerstone of our modern slavery program. As outlined above, we have assessed that our modern slavery risks are concentrated in our supply chains and we seek to work closely with relevant Tier 1 suppliers to assess and manage these risks.

The visual below outlines the key steps in our supplier due diligence process, which focuses on a risk-based approach in line with the United Nations Guiding Principles on Business and Human Rights. This approach supports us to identify and mitigate key risk areas and facilitates ongoing and open dialogue with selected suppliers.

We are working to further refine our supplier due diligence, including to support more targeted engagement with higher risk suppliers. During FY26, we also intend to appoint a dedicated Supplier Governance & Transition Lead to oversee supplier engagement, data validation, and program monitoring. This role reflects a strategic investment in ensuring we continue to improve our systems and processes, including to prepare for potential legislative due diligence requirements.

Figure 2: Supplier Risk Assessment Process



Expanding the scope of our modern slavery risk assessments

In FY25, we increased the number of suppliers onboarded to the AAAA platform to 354, including 223 completing the SAQ. This is a significant increase from the 153 suppliers that completed the SAQ in FY24.

Our total number of onboarded suppliers represents approximately 65% of our total supplier spend. This has helped us gain a stronger understanding of our Tier 1 supplier landscape across both our direct and indirect suppliers.

Importantly, our success to date in onboarding a large proportion of our supplier base (by spend) positions us to deepen our due diligence in the coming years, by enabling us to transition our focus to engaging with higher risk suppliers.



Key Data and Insights



354

suppliers onboarded (exceeding our target of 304).



Of the onboarded suppliers, over

60%

have completed the SAQ (more than double the average SAQ completion rate through the platform for our industry)



283

direct suppliers onboarded across 11 procurement categories.



71

indirect suppliers onboarded across seven procurement categories.



175

direct suppliers completed the SAQ headquartered in 22 different countries



48

indirect suppliers completed the SAQ across five different countries

Supplier SAQ results

The chart below shows the inherent risk rating for the 223 suppliers that completed the SAQ in the reporting period. The inherent risk ratings provide an important view of how modern slavery risk may be distributed across our supplier base. As outlined below, we are considering options to build on this process by undertaking additional targeted due diligence reviews of higher risk suppliers.

Industry and country risk

While many of our suppliers have been assessed as very low to medium risk, 66 suppliers sit in the high or very high risk categories. These high and very high risk ratings reflect a number of factors, including industry risk.

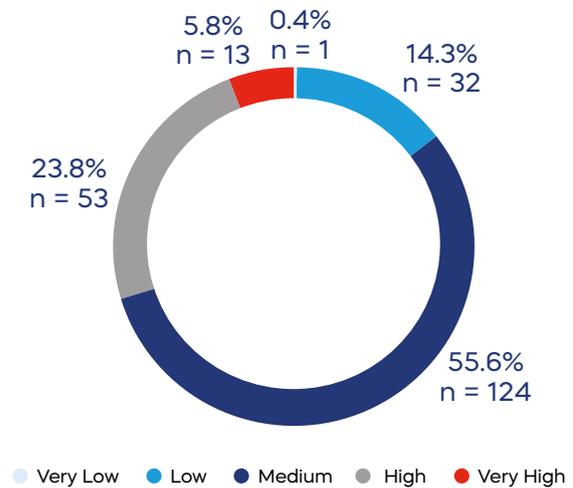
The nature of our manufacturing supply chains means they involve higher levels of industry risks due to characteristics such as their complexity; the nature of the work performed (which can include lower skilled and dangerous work); and the workforce characteristics (such as use of migrant labour and subcontracted workers). Certain industries in our supply chain may also involve low margins and high levels of pricing competition.

Country risk is also a key driver for our supplier risk profile. Our suppliers are predominantly located in Asia, which includes countries assessed as higher risk for modern slavery by third parties such as the Walk Free Global Slavery Index. The overall number of high risk suppliers also increased from FY24 due to a change to the country level risk rating from medium to high for a key sourcing country in Asia in our supply chain, including due to reported state-imposed forced labour.

Supplier maturity

The SAQ results for higher risk suppliers provide us with an indication of these suppliers' maturity, including highlighting areas of strength and weakness in their respective modern slavery risk management. For example, based on the SAQ responses, we have identified key areas for improvement for higher risk suppliers as including low visibility of their own supply chains, as well as limitations around suppliers' policies and procedures, and in relation to remediation processes. Conversely, areas where higher risk suppliers appeared to show comparatively stronger responses included education and training and subcontracting and third party recruitment. We will take these findings into account when engaging with suppliers.

Figure 3: Supplier maturity – inherent risk



Strengthening the consistency of our desktop reviews of supplier SAQs

As we continue to increase the proportion of our supplier base onboarded to the AAAA platform, we are exploring opportunities to enhance the effectiveness of this process. This includes trialling a 'balanced scorecard' approach to assessing suppliers' SAQ responses. This approach was developed in collaboration with other AAAA Modern Slavery Consortium members and aims to promote greater consistency in assessing responses and triaging suppliers for further engagement.

This scoring approach provides a set of scoring bands to rank suppliers from very low to very high risk and auto calculates scores based on key areas of the SAQ, which include a tailored risk weighting.

We are continuing to work with the AAAA Modern Slavery Consortium to enhance this methodology, including to refine the scoring bands to help ensure a meaningful distribution of suppliers across each band.

Targeted due diligence review of higher risk suppliers, including direct, 1-1 engagement with suppliers

Our SAQ process provides the foundation for our approach to managing modern slavery risks in our supply chain. However, we also recognise the importance of building on the SAQ process through direct engagement with higher risk suppliers.

During the reporting period, we undertook a targeted due diligence review of 31 suppliers we identified as high risk through the SAQ process in FY24. These suppliers represented approximately 5% of Bapcor's annual spend, with a majority of the suppliers providing Bapcor with own brand products.

The due diligence review included consideration of key evidence sources, including: the SAQ results⁵ and any follow up supplier meetings; additional information provided by the supplier; and information from visits to the supplier sites by Bapcor (where a visit had been undertaken in the past three years).

Based on the results of this review, suppliers were assigned to three categories: a) monitor and continue business as usual engagement; b) meet with the supplier to discuss its processes and controls; and c) prioritise the supplier for a third party social audit. In total, 27 suppliers were assessed as requiring further engagement through a meeting and in some cases a follow up social audit. During the reporting period, Bapcor met with 13 of these suppliers representing approximately 74% of the spend identified as high risk. Where relevant these interviews were supported by a Mandarin speaking Bapcor team member. Following this engagement, we re-rated the suppliers to allocate each supplier a final risk rating and developed a suite of internal recommendations for action to incorporate lessons learned into our due diligence approach.



CASE STUDY

Supplier engagement

Supplier A was one of the FY24 high risk suppliers included in our targeted due diligence review. Supplier A provides own brand products to Bapcor.

As part of the review, Supplier A was identified as requiring a follow up meeting to discuss findings from a 2021 third party social audit and how these had been addressed. Our engagement with Supplier A determined that it had completed a follow up audit in 2023, which indicated that non-conformances identified through the 2021 audit had been satisfactorily addressed.

Based on this additional information, we re-categorised Supplier A to 'monitor' and will review the findings of a further audit of the supplier planned for 2025.

Key reflections: This project provided an important opportunity to better understand suppliers' practices and contexts and reinforced to us the importance of supplier engagement. For example, 12 of the 13 suppliers were able to provide Bapcor with copies of audit reports that had not previously been provided through the SAQ process. This improved our understanding of the types of issues identified at supplier sites. The supplier meetings also built our understanding of key standards used by automotive suppliers and how we can leverage these in future due diligence. Importantly, this process underscored that suppliers may have limited visibility of their own value chains beyond their own Tier 1 suppliers. While we also recognise the limitations of this supplier due diligence review, we are exploring how we can better integrate direct engagement with higher risk suppliers into our due diligence processes.

5. This assessment was undertaken prior to Bapcor trialling the 'balanced scorecard' approach to assessing SAQs.

Stakeholder Engagement and Collaboration

Modern slavery is not a problem that can be solved alone – it requires purposeful and effective collaboration across stakeholder groups. Our stakeholder engagement supports us to build the necessary partnerships to be effective in our work against modern slavery. It also enables us to obtain and share relevant information including with our industry peers and our investors.

Stakeholders	Key areas of focus	How we engage
Investors	Ethical operations Human rights Modern slavery	<ul style="list-style-type: none"> • Investor centre • Materiality assessment • One-on-one meetings • Annual & interim reporting • Briefings • Investors Against Slavery and Trafficking – Australia Pacific (APAC) initiatives
Suppliers	Supply chain responsibility Human rights Modern slavery	<ul style="list-style-type: none"> • Materiality assessment • Supplier briefings • Supplier portal (AAAA platform) • Supplier visits and one-on-one meetings
Industry	Human rights Modern slavery	<ul style="list-style-type: none"> • UNGC Network Modern Slavery Community of Practice • AAAA Modern Slavery Consortium

Engagement in Focus: AAAA Modern Slavery Consortium

During FY25, Bapcor continued to participate in the AAAA Modern Slavery Consortium. Members met bi-monthly between July and December 2024 and monthly from January to June 2025.

Our Procurement Team actively engages in the AAAA Modern Slavery Consortium process, which offers valuable insights to enhance our approach. For example, through this group, we receive and consider briefings on important global trends and legislative updates affecting responsible business practice.

Topics discussed during FY25 included:

- Management of higher risk suppliers;
- Supplier engagement, including auditing, verification and learning and training needs; and
- Grievance mechanisms, including raising awareness of reporting pathways.

Members also received a briefing from the Commonwealth Attorney-General's Department on modern slavery reporting trends and opportunities for continuous improvement.

In addition to the information sharing and collaboration outlined above, the AAAA Modern Slavery Consortium also continued to focus on opportunities to enhance the SAQ process.

A key resource from our work in FY25 is the trialling of a balanced scorecard framework to apply an evidence-based risk score to each supplier using relevant data points.

Engagement in Focus: Investors Against Slavery & Trafficking (IAST) – APAC

We continued to engage with investors over the reporting period. This included responding to investor questions about our modern slavery program received during the reporting period, including our supplier due diligence approach.

We also continued to engage with IAST-APAC, an investor-led, multi-stakeholder initiative established in 2020 to engage with companies in the APAC region to promote and provide guidance on identifying, rectifying, and preventing modern slavery within their operations and supply chains. We anticipate a formal meeting with IAST-APAC will be arranged in FY26.

Our ongoing engagement with investors continues to provide useful insights into how we can continuously improve our approach to modern slavery and related human rights concerns.

Grievance Mechanisms and Remediation Processes

Raising modern slavery concerns

Internal and relevant external stakeholders are able to raise concerns about modern slavery or other human rights harm through our confidential and externally managed whistleblower service 'Speak Up at Bapcor'. Concerns can be raised via a hotline (in Australia and New Zealand), email address and online webform, as well as by mail. We promote the whistleblower mechanism in our Human Rights Policy and Ethical Supply Chain/Procurement Policy, as well as through our internal intranet page.

Responding to modern slavery concerns

We recognise that responding to modern slavery concerns can be complex. If we received a modern slavery allegation through our whistleblower mechanism, or our own processes identified concerns with a supplier, we would seek to take a human right informed and people centred approach to investigating the potential modern slavery harm.

During the reporting period, eight selected Bapcor team members from our Procurement and Sustainability teams took part in a research project focused on remediating modern slavery in supply chains. The research project was titled 'Optimising Remediation of Slavery in Supply Chains Through Victim-Centred Decision Design: An Experimental Approach' and participants completed an online activity related to remediating a hypothetical modern slavery incident in a business supply chain.

Guidance for suppliers

Our suppliers can play an important role in supporting us to identify and respond to potential modern slavery incidents. Our suppliers that complete the SAQ through the AAAA platform are provided with links to a range of resources, including a 'grievance mechanisms toolkit' developed by a third party.

Assessing our effectiveness

We are focused on continuously improving our program and building on lessons learned and insights gained from previous reporting periods. Our Working Group is primarily responsible for tracking our effectiveness by monitoring our progress and implementing our Modern Slavery Roadmap.

The table below explains the key actions we have taken to date and their outcomes, which we use to inform our understanding of our effectiveness. Where relevant, it also flags our future plans.



Assessing our effectiveness continued

Objectives

FY25 Activities



Strategic Sourcing and Systems Alignment

Centralised and strategic procurement

- Align sourcing practices with modern slavery risk mitigation efforts.

- Undertook targeted modern slavery risk assessment of five direct spend categories.



Organisational capacity building

Responsible sourcing

- Enhance internal capabilities to address modern slavery in supply chains.

- Refreshed our online modern slavery training module and continued providing training to team members.
- Participated in case study exercise on remediating modern slavery in supply chains (page 19).
- Continued to share resource documents with relevant suppliers through the AAAA platform.

Policies and governance

- Provide oversight of modern slavery risks and management frameworks to guide decision-making and continuous improvement.
- Provide clear compliance guidelines for organisation-wide activities.
- Ensure policies relevant to modern slavery are current and in line with international standards.

- Convened the Working Group for periodic meetings over the FY (page 12).
- Reviewed and updated our Human Rights and Ethical Supply Chain/ Procurement Policy (page 13).



Stakeholder engagement

AAAA platform

- Improve and action information gathered from suppliers to inform decision-making regarding modern slavery risks in Bapcor's supply chains.

- Continued to onboard suppliers to the AAAA platform.
- Trialled a balanced scorecard approach to assessing SAQs.
- Participated in regular meetings of the AAAA Modern Slavery Consortium.

Internal engagement

- Strengthen relationships and information sharing with New Zealand and Thailand operations.

- Completed a site visit to our Thai operations.



Due diligence, verification and validation

Supply chain due diligence

- Verify supply chain conditions meet Bapcor expectations for respecting human rights.

- Undertook a due diligence review of 31 potentially higher risk suppliers, including meeting directly with 13 of these suppliers.

FY25 Outcomes

Future Plans

- We enhanced our understanding of potential supplier risks in our direct supplier cohort, strengthening our ability to take these risks into account in our sourcing practices.

- Continue to research potentially high risk products and map relevant supply chains.
- Continue to increase contract coverage using updated modern slavery clauses.

- Completion of the online training supported awareness of modern slavery across the business and built team members' capacity to engage with suppliers.
- We increased our preparedness to respond to a modern slavery allegation in our supply chains.

- Continue to provide appropriate training to team members with a target of >90% completion over the two-year training cycle.
- Tailored resources to be provided to suppliers through the AAAA platform to align with strengths and weaknesses of suppliers' SAQ answers.

- Our policies continued to clearly set out our expectations for internal and external stakeholders and provide a clear and consistent path for strategic engagement with suppliers around modern slavery risks.

- Continue to hold Working Group meetings, at least, bi-annually.
- Review and refresh relevant policies, as appropriate.

- The total number of onboarded suppliers to the AAAA platform increased significantly and now represents 65% of our supplier spend.
- Participation in AAAA Modern Slavery Consortium meetings informed our understanding of good practice and evolving stakeholder and legislative expectations.

- Continue to onboard suppliers to the AAAA platform with a target of a 5% increase in the percentage of the supplier base (by spend) covered year on year.
- Identify industry collaboration targets to strengthen AAAA platform.
- Refine approaches to scoring SAQs with the aim of developing a consistent and effective scoring system for all AAAA Modern Slavery Consortium members.
- Hold a supplier forum briefing that includes communicating expectations related to modern slavery.

- We maintained awareness of our modern slavery program across our Thai and New Zealand operations.

- Continue to engage with our Thai and New Zealand operations around modern slavery risk management.

- We enhanced our understanding of potential supplier risks in our direct supplier cohort and strengthened our relationships and communication channels with key suppliers.

- Appoint a dedicated Supplier Governance & Transition Lead to oversee supplier engagement, data validation, and program monitoring, including in relation to modern slavery.
- Refine and implement a modern slavery risk assessment methodology for suppliers to support consistent management of potentially higher risk suppliers.
- Continue to engage with potentially higher risk Tier 1 suppliers, including through supplier risk assessments beyond SAQs and implementation of an audit program.

