

PEDAL GROUP

MODERN SLAVERY STATEMENT



*“Enrich mind, body, earth or soul
with the freedom of riding”*



ABN: 67 131 402 278



Introduction

This Modern Slavery Statement is made on behalf of Pedal Group Pty Ltd (“Pedal Group”) (ABN: 67 131 402 278) and its subsidiaries and the entities it owns and controls, including 99 Bikes Pty Ltd (“99 Bikes AU”) (ABN: 87 123 966 665), Advance Traders (Australia) Pty Ltd (“ATA”) (ABN: 21 130 664 194) and Pedal Group Property Pty Ltd (“PGP”) (ABN: 66 622 878 808), collectively referred to in this statement as “the Group”. Pedal Group, 99 Bikes AU, ATA and PGP are reporting entities under the Modern Slavery Act 2018 (Cth) (“the Act”).

The Group is committed to ethical and responsible business conduct in its operations. We believe in treating all our employees and those who work in our supply chains with dignity and respect and consider fair labour practices to be an important component of their human rights. We seek to engage with business partners that respect the protection of human rights and that demonstrate sound ethical practices. We expect our employees and all individuals who work for us, or on our behalf, to respect and uphold the human rights of others.

Our Organisational Structure, Operations & Supply Chains



99 Bikes

Pedal Group is underpinned by its flagship retail stores, 99 Bikes AU. 99 Bikes AU has grown from one store in 2007 to sixty two stores as of 30 June 2022 and is now one of the major companies in the bicycle retail industry in Australia. 99 Bikes AU employs 700 staff across Australia.

Advance Traders Australia

The wholesale business of ATA distributes bicycles, bicycle parts and accessories via 99 Bikes AU and other independent bike shops. The company has Australian distribution rights with approximately thirty brands, including Merida, Norco, BMC and Met.

Pedal Group Property (PGP)

The property business' main purpose is to buy appropriate properties for the 99 Bikes AU Retail stores. PGP has two full time employees based in Australia who look after the purchasing, property management and sale of properties.

Operations

The Group's operations were limited to Australia until the group expanded into New Zealand on 1 July 2020 opening nine 99 Bikes retail stores and commencing wholesaling operations under the Advance Traders (New Zealand) brand.

As at 30 June 2022 all employees were employed in Australia and New Zealand with the majority employed under the General Retail Industry Award, which sets minimum pay and conditions for specific categories of workers. The remainder of our employees have individual employment contracts, which provide additional conditions for an individual employee, but cannot reduce or remove the minimum entitlements prescribed under the National Employment Standards. We undertake reviews of the General Retail Industry Award and employment contracts to ensure our workers' entitlements are being met. We undertake payroll reviews to ensure our workers are being paid correctly.

The Group sources products, parts and services from the following countries:

- **Australia**
- **Taiwan**
- **USA**
- **Switzerland**
- **Austria**
- **Japan**
- **New Zealand**
- **Hong Kong**
- **United Kingdom**
- **Italy**
- **Poland**
- **China**
- **Canada**
- **Germany**
- **Portugal**
- **Netherlands**



Supply Chains

The Group's supply chains include the various goods and services it procures that contribute to the services and products the group sells. The goods and services that we procure fall into the following categories:



**BICYCLES AND BICYCLE
RELATED PRODUCTS
FOR RESALE**



**WORKSHOP
CONSUMABLES**



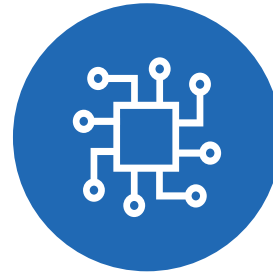
PROPERTY



UTILITIES



TOOLS AND EQUIPMENT



TECHNOLOGY PRODUCTS



OFFICE CONSUMABLES



**TRANSPORT AND
FREIGHT**



**PROFESSIONAL
SERVICES AND
CONSULTANTS**

The risks of modern slavery practices in our operations and supply chains

The Group's supply chain includes the supply of goods and services used in operations. This includes but is not limited to bicycles, bicycle parts and accessories such as clothing and footwear, car racks, helmets, tools and equipment.

Geographically, Pedal Group operates in the low risk countries of Australia and New Zealand. The partnerships the group has with its suppliers in the countries listed earlier are also reported to have a low risk prevalence of modern slavery by international standards.

Pedal Group seeks to partner with suppliers that ensure a fair and ethical workplace, where the highest standards of human rights are upheld. Parts and components are supplied by reputable companies, however there may be risks that manufacturer or supply of some parts and components may contribute to modern slavery practices. Pedal Group is not aware of such practices.





Operations

Pedal Group has a number of human resource policies that are currently in place for 99 Bikes AU. There is a project to expand these policies to the rest of The Group by 30th June 2023. Relevant policies include:

- **Code of Conduct**
- **Anti-Bullying, Harassment and Discrimination**
- **Whistleblowing**
- **Occupational Health and Safety**

Other policies include:

- **Annual leave / Flexible Working Arrangements**
- **Communication, Email and Internet policy**
- **Dispute Resolution**
- **Sexual Harassment**
- **Domestic & Family Abuse**
- **Drug, Alcohol & Smoking Policy**
- **Parental Leave**



Actions taken to assess and address modern slavery risks

We have endeavored to understand modern slavery risks across our operations and supply chain. Pedal Group will continue to build expertise within its procurement teams and raise awareness among suppliers in relation to modern slavery issues.

Pedal Group screened suppliers for adverse media relating to human exploitation. Pedal Group is committed to not knowingly conducting business with any company or individual engaged in modern slavery, human trafficking or knowingly permitting such conduct to be carried out in any of our supply chains.

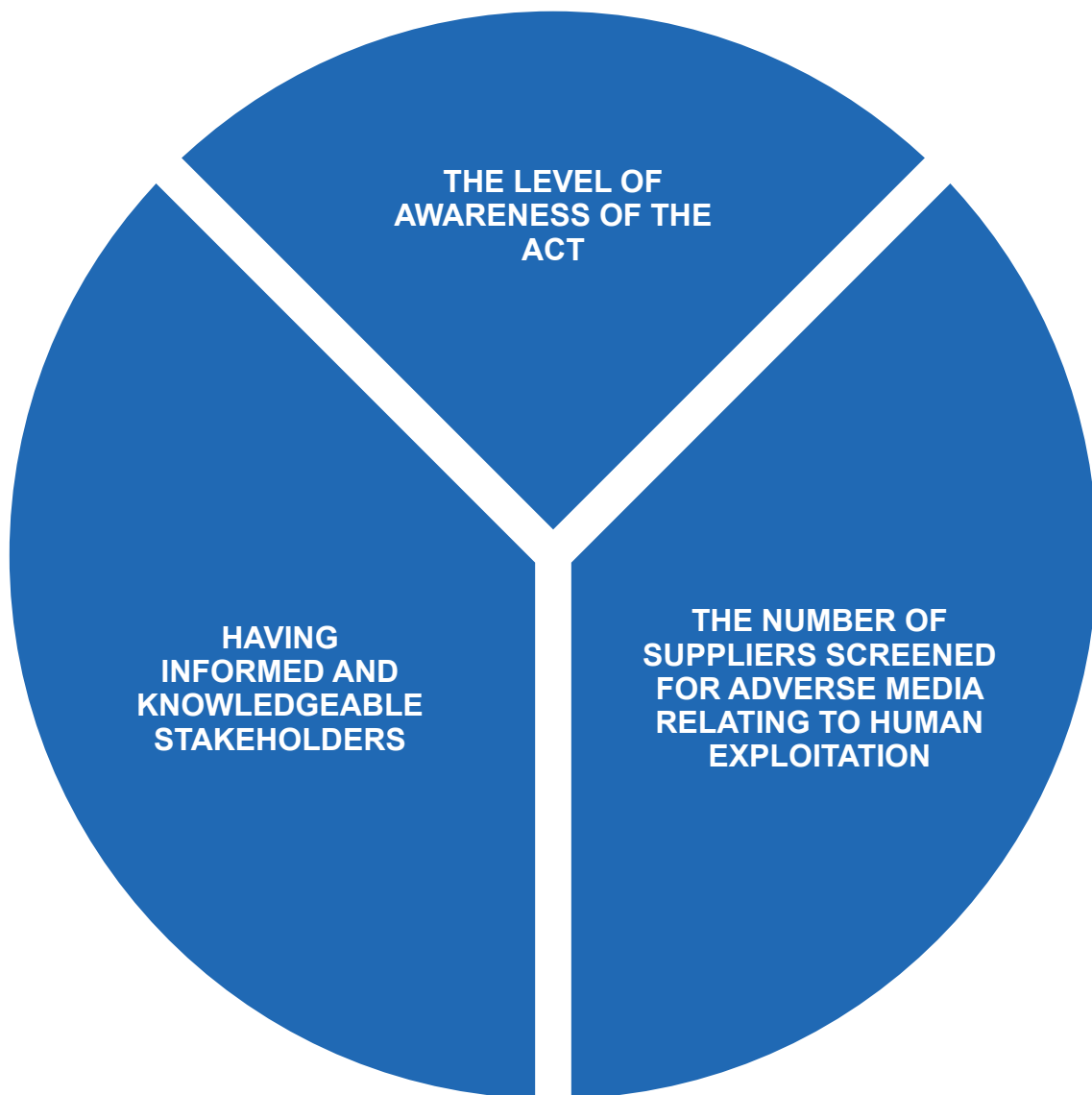
Since implementation of the Act, 99 Bikes AU now includes anti-slavery and anti-human trafficking clauses in contracts with suppliers.

In December 2022, Pedal Group established a “Supplier Code of Conduct”, to share with all main suppliers for sign-off, requesting a copy of their internal Code of Conduct and a self assessment review. The sections covered in our “Supplier Code of Conduct” include:



Measuring the effectiveness of our actions

Pedal Group are committed to effective actions to address modern slavery risks, and are measuring the effectiveness of our actions through:



Future Actions

Pedal Group recognises we have more work to do to identify and manage the risk of modern slavery in our organisation and supply chains.

Next steps include yet are not limited to:

- Supplier Code of Conduct follow up with all major suppliers by 30th June 2023;
- Further build expertise among our procurement teams through training to ensure our team members understand our policies and identify risks through the supply chain;
- Continued monitoring of existing supply chain through supplier screening for adverse media relating to human exploitation; and
- Expanding our Human Resources & Ant-slavery policies across all Pedal Group businesses in Australia & New Zealand

This Modern Slavery Statement was approved by the Board of Pedal Group, on behalf of itself, and all owned entities on 31 December 2022.



Andrew Garnsworthy

Pedal Group CEO

31 December 2022