

Modern Slavery Statement 2025

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Acknowledgement of Country

FleetPartners acknowledges the traditional owners of the lands and waters across the Australian continent and pays our respects to the many thousands of generations who looked after the lands and waters where we currently live and work. We are all visitors to this time and this place. We are just passing through. Our purpose here is to respect, to learn and to grow.

Kia ora tatou (Hello everyone)

FleetPartners aspires to having a better understanding of Te ao Māori (the Māori World) and creating a meaningful impact on Te ao Hurihuri (the ever-changing world around us).



Modern Slavery Statement 2025

1. Introduction

This joint Statement is prepared and made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) by FleetPartners Group Limited ABN 85 131 557 901 on behalf of itself and the following subsidiaries:

- Fleet Partners Pty Limited ABN 63 006 706 832
- Pacific Leasing Solutions (Australia) Pty Limited ABN 84 121 168 447
- Leasing Finance (Australia) Pty Ltd ABN 39 121 167 824
- Fleet Holding (Australia) Pty Ltd ABN 37 121 167 815

(together **FleetPartners, Group, we, our**) in respect of the financial year ended 30 September 2025 (**Reporting Period**).

FleetPartners remains committed to ethical business practices and respecting human rights in our operations and our supply chain.

This Statement has been approved by the Board of Directors of FleetPartners Group Limited on behalf of all reporting entities in the Group, as listed in section 8 (**Approval**) of this Statement.

2. Our structure, operations and supply chain

2.1 Our structure

FleetPartners Group Limited is incorporated in Australia and is listed on the Australian Stock Exchange (ASX:FPR) and is the parent entity of the Group. The controlled entities of the Group listed in Appendix 1 were wholly owned during the Reporting Period, unless otherwise stated.

During the Reporting Period, the Group's headquarters relocated from St Leonards to North Sydney, New South Wales. We continue to have presence in Melbourne, Brisbane and New Zealand. Some of our workforce work remotely in Australia on a permanent basis.

2.2 Our operations

FleetPartners provides vehicle leasing (by way of operating and finance leases) and fleet management services in Australia and New Zealand. In Australia, we also provide novated leasing and salary packaging benefits. FleetPartners manages over 80,000 vehicles on behalf of customers.

We have approximately 435 employees in both Australia and New Zealand, the majority of whom perform office-based functions and all of whom are aged over 18 years. A small number of employees perform on-site checks and inspections of vehicle-related matters of certain Australian-based suppliers.

2.3 Our supply chains

The categories of suppliers in our supply chains remains largely unchanged from the previous reporting period. The main suppliers in our supply chain can be broadly classified into two categories: corporate support and vehicle lease lifecycle.

Throughout the term of a vehicle lease we coordinate the provision of vehicle in-life services, and at lease end, we arrange for the vehicle to be re-marketed. A considerable number of our vehicle dealerships or certain service providers engaged for vehicle related services are selected directly by our customers.

An overview of some of the categories of suppliers in our supply chain is below.

Corporate support	Vehicle lease lifecycle [^]
Finance	Vehicle manufacturers and dealers
Professional services (e.g. consultancy, legal services, accounting, advisory, creative)	After-market vehicle accessories and products
Technology services and products	Vehicle repairs and maintenance
Office cleaners	Fuel and vehicle energy suppliers
Utilities	Vehicle disposal agents and auction houses
Travel services and accommodation	Rental cars and accident management services
Office Supplies	Motor vehicle insurance
Catering	Tyre suppliers
	Vehicle transport
	Roadside and breakdown assistance

[^] Certain suppliers in the vehicle lease lifecycle category may be selected by our customers.

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2. Our structure, operations and supply chain continued

These entities are primarily based in Australia and New Zealand. Some IT software and services are procured from suppliers located in Singapore, India and the USA.

To identify the risk of modern slavery in our supply chain, we sought responses from a number of our suppliers to a modern slavery questionnaire (MSQ) as detailed in section 4.1. The majority of the suppliers that completed the MSQ submitted that they are located or registered in either Australia or New Zealand.

3. Risks of modern slavery in our operations and supply chain

3.1 Risk in our operations

The Global Slavery Index 2023, published by Walk Free, an international human rights group focussed on the eradication of modern slavery has on a scale of 0 to 100, with 100 being the highest vulnerability to modern slavery, rated Australia as 7 and New Zealand as 8, both resulting in below average vulnerability for the region.¹ However, in recent years there has been an increase in the reports of human trafficking and modern slavery in Australia with the Australian Federal Police having received 420 reports in the 2024-2025 financial year, an increase of 10% from the previous year,² reaching the highest level on record. Over 80% of reports related to forced marriage, sexual servitude, exit trafficking, child trafficking, domestic servitude and domestic trafficking in persons.

Despite the increase in reports in recent years, given the nature of our operations, in Australia and New Zealand, we consider that the geographic risk of modern slavery in our operations remains low.

The low geographic risk, combined with our employment and recruitment practices and our workforce profile, reduces the risk of our business causing or contributing to adverse human rights impacts, including modern slavery in our operations.

Our employment and recruitment practices include policies, systems and procedures designed to address ethical employment practices, human rights, and our employees' rights to a flexible and safe workplace and appropriate remuneration.

We conduct our operations in accordance with our Code of Conduct, policies, systems and procedures, which aim to ensure we remain compliant with relevant legislative requirements.

FleetPartners remunerates employees aligned to local market conditions, in compliance with applicable legislative requirements and commensurate to the responsibilities of each role.

We conduct an annual gender pay review and during the Reporting Period we published our Australian Gender Pay Gap Statement as required by the Workplace Gender Equality Agency (WGGEA). We have reaffirmed our commitment to promoting gender equality across the organisation and remain committed to addressing the gender pay gap that still exists in our operations. We are confident that we have no like for like gender pay gap.

We provide all employees access to an external employee assistance program which offers a range of support services including workplace issues, critical incidents, diversity and inclusion, family and healthy relationships, health and wellbeing.

3.2 Risk in our supply chain

Based on our direct procurement categories, location of direct suppliers and the risk assessment results from the MSQ process, we consider that the risk of FleetPartners having caused or contributed to adverse human rights impacts, including modern slavery, in our supply chain remains low.

However, we recognise that the supply chains of our direct suppliers, especially those in the vehicle supply chain, are likely to include suppliers (both direct and indirect) from countries where modern slavery practices such as forced labour, debt bondage and the worst forms of child labour are more prevalent.

Suppliers in the manufacturing sector are exposed to modern slavery risks as a result of complex supply chains that are reliant on raw materials sourced or processed from higher risk countries (for example, critical minerals for electric vehicle batteries and natural rubber used in tyres).

We are aware of reports of child and forced labour risks in multiple components in the automotive manufacturing sector³ in general, and in the electric vehicle (EV) supply chains including related infrastructure such as charging stations.⁴

"Automotive supply chains are complex, involving a large range of raw materials and assembled components from many suppliers. This complex supply chain is overlaid with varying regulatory contexts across producing regions, obscures visibility and makes it more difficult for end-product buyers to exercise effective oversight and leverage".⁵

1. Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available from <https://www.walkfree.org/global-slavery-index/country-studies/australia/>.

2. Australian Federal Police, Media Release 12 October 2025. Available from: <https://www.afp.gov.au/news-centre/media-release/reports-human-trafficking-nearly-double-over-past-five-years>.

3. Office of the NSW Anti-Slavery Commissioner, within Inherent Risk Identification Tool (version 2) available via <https://dcj.nsw.gov.au/legal-and-justice/our-commissioners/anti-slavery-commissioner/due-diligence-and-reporting>.

4. Office of the NSW Anti-Slavery Commissioner, Managing modern slavery risks in NSW government procurement of electric vehicles (May 2025) – Report 1, Page 44.

5. Office of the NSW Anti-Slavery Commissioner, Managing modern slavery risks in NSW government procurement of electric vehicles (May 2025) – Report 1, Page 45.

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3. Risks of modern slavery in our operations and supply chain continued

Furthermore, suppliers of services reliant on base-skilled workers which have low barriers to entry have increased exposure to causing, contributing to or being linked to modern slavery, such as forced labour and debt bondage, irrespective of the jurisdiction risk profile. For example, cleaning services, labour hire, and roles with temporary staffing and recruitment are sectors which are more vulnerable to modern slavery even in low-risk jurisdictions such as Australia and New Zealand.

Consistent with the Group's assessment of its own modern slavery risk, the risk mapping and due diligence procedures, we continue to consider that the majority of our key direct suppliers⁶ as having a lower risk of modern slavery within their operations. Greater risk exists within their respective supply chains as described above.

4. Action taken to assess and address modern slavery risks

During the Reporting Period, we focused on embedding measures previously introduced and undertook a case study to gain a better understanding of how our customers consider modern slavery or human rights risks when making their vehicle selection decisions.

Case Study

We surveyed our top 20 customers (identified by the number of current leases) and asked them to rank nine factors in order of importance when making vehicle selection decisions. The nine factors were safety rating, fit for purpose for specific task, cost per month, carbon emissions or fuel efficiency, fleet carbon strategy in selecting vehicle type (Battery Electric, Plug-in Hybrid, Hybrid, Internal Combustion Engine), vehicle brand, model familiarity, human rights or modern slavery risks associated with vehicle manufacture and country of manufacture of selected vehicle model.

We received 12 responses. Of these, 83% reported having a policy that requires purchasing decisions to consider human rights and modern slavery risks. When ranking the nine factors, the four most important were safety rating, fit for purpose for specific task, cost per month and carbon emissions or fuel efficiency. Human rights or modern slavery risks associated with a vehicle manufacturer was ranked 8th overall, with three customers ranking it as the least important of the nine factors.

Given the limited number of responses, we are cautious about drawing any conclusions but note how vehicle selection by our customers is driven by multiple factors with higher priority given to safety, specifications and price.

4.1 Supplier Due Diligence

We continued to use a third-party risk platform to assess the risk of modern slavery in our supply chain through the use of a MSQ. During this Reporting Period, the approach for issuing an MSQ was:

- suppliers screened in previous reporting periods were re-screened if the supplier's risk rating was previously assessed as medium or high in a prior MSQ or if the supplier failed to complete a previously issued MSQ; and
- determining vehicle lifecycle related suppliers as material if we spent equal to or greater than \$100,000 in the 12 month period July 2024 to June 2025. Further, if within that cohort, suppliers were able to be identified as being owned by a common parent who we have a relationship with, only the parent entity was assessed on behalf of its subsidiaries.

Of those that responded, we identified approximately 25 suppliers based in Australia whose MSQ results in the Reporting Period returned High Risk alerts. We contacted these suppliers for more information and clarification regarding their responses.

Some indicated a misunderstanding of a question, or identified errors in completing the MSQ which triggered the Higher Risk alert. A number of the remaining suppliers supply the Group with vehicles or vehicle parts manufactured by OEMs. These suppliers acknowledged that whilst the vehicles they supply were likely to contain high risk materials such as copper, aluminium/bauxite, glass (silica sand), leather, lithium, nickel, steel/ iron, tin, rubber or polysilicon as they were not the manufacturer of the vehicles or parts so they did not have a policy for the responsible sourcing of these high risk materials. Further, some of these Australian based suppliers also employed young workers (under 18) leading to higher risks in the workforce composition.

As was the case in previous reporting periods, some vehicle manufacture and finance sector suppliers declined to complete the questionnaire. An Australian bank advised us it was their policy not to complete any third party modern slavery questionnaires.

Despite this, we will continue to request completion of our MSQ as in accordance with our program of activities.

4.2 Other actions

Training

We have continued to deliver the current Modern Slavery training to our employees in Australia as well as a target group of employees in New Zealand.

Employees are required to complete comprehensive compliance training in relation to, among other regulatory obligations, identifying modern slavery and human trafficking risks and refresh their compliance training biennially.

6. The parameters used by FleetPartners to identify our 'key direct suppliers' broadly include: suppliers assessed in previous reporting periods as posing a medium or high modern slavery risk regardless of other criteria or spend threshold; certain targeted industries; and strategic importance or materiality to our operations (e.g. ICT, financial services, professional services and certain heavy commercial vehicle suppliers/maintenance providers). This description was originally published in our FY23 Modern Slavery Statement.

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4. Action taken to assess and address modern slavery risks continued

Policies

The Board endorsed an updated version of the FleetPartners' Modern Slavery Policy in the previous reporting period. The Modern Slavery Policy is published on our intranet, and designates the Chief Legal Officer as the Modern Slavery Policy Officer.

Our Whistleblower Policy, which applies in both Australia and New Zealand, encourages the reporting of any conduct or activities relating to human rights or modern slavery issues as being matters that may be reported under this Policy.

The Modern Slavery Policy, together with the Whistleblower Policy, make it clear that anyone who reports concerns will not be subjected to retaliation for reporting such risks.

During the Reporting Period, no reports of actual or suspected modern slavery were received.

Supplier Code of Conduct

The FleetPartners' Supplier Code of Conduct (**Supplier Code**) remained in place and is published on our website. The Supplier Code articulates our minimum expectations of suppliers providing goods and services to FleetPartners in both Australia and New Zealand that we expect our suppliers to meet or exceed. The Supplier Code includes an expectation that suppliers create a safe working environment for their workers and do not permit any form of forced, bonded or indentured labour.

All suppliers that responded to our MSQ have either agreed to comply with our Supplier Code or comply with their own comparable code.

Supplier Agreements

We have included undertakings to adhere to the Supplier Code and contractual obligations not to cause or contribute to modern slavery in our standard supplier agreements. Our standard supplier agreements also include contractual obligations to comply with relevant laws, including human rights laws.

5. Effectiveness

We remain committed to evaluating the effectiveness of our actions, adapting and strengthening our approach as necessary. Our assessment of our effectiveness in FY25 included review of our achievement of the actions described in the "Next steps" section in our FY24 Statement. The results of our effectiveness assessment were provided to the Board.

In FY26, we will continue to track our achievement of the action plan outlined under section 6 (**Next steps**). As we were unable to further develop our effectiveness assessment methodology during the Reporting Period, we intend to undertake this task in FY26.

We will also continue to monitor the Group's compliance with the policies and procedures as described in this Statement and update the Board on any emerging risks or modern slavery-related concerns identified during the next reporting period.

6. Next steps

Our action plan for the next reporting period is to:

- consolidate our current program;
- develop our procurement framework – aiming to improve the assessment of modern slavery risks in supplier selection;
- develop our effectiveness assessment, which was unable to be completed in the Reporting Period;
- continue to use the results from our MSQ to engage with those suppliers identified as having a higher risk of modern slavery and to the extent possible, use our leverage to mitigate any adverse human rights impacts with those suppliers; and
- review the Supplier Code of Conduct and make the revised Code known to our suppliers.

7. Consultation

FleetPartners operates a shared services model, and has centralised human resources, vehicle lifecycle procurement, IT, finance, risk and legal functions.

Accordingly, there is one management team responsible for coordinating the Group's approach to assessing and addressing the modern slavery risks within the Group and within its supply chain (as explained above) and for preparing this Statement. This process constituted the consultation process with the entities owned or controlled by FleetPartners Group Limited in the development of this Statement.

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8. Approval

This Statement is made pursuant to section 14(1) of the Act and constitutes the Modern Slavery Statement for the Reporting Period ending 30 September 2025 for FleetPartners Group Limited, as a joint statement, inclusive of the relevant related companies of FleetPartners Group Limited to which the Act applies.

In Australia, these related companies are

- Fleet Partners Pty Limited;
- Pacific Leasing Solutions (Australia) Pty Limited;
- Leasing Finance (Australia) Pty Ltd; and
- Fleet Holding (Australia) Pty Ltd.

FleetPartners Group Limited, as the ultimate holding company and higher entity of these companies, is in a position to control each reporting entity covered by this Statement.

In accordance with section 14(2)(d)(ii), this Statement has been approved by the Board of FleetPartners Group Limited on 18 March 2026 and signed by Gail Pemberton AO, Chair and Damien Berrell, Chief Executive Officer and Managing Director.



Gail Pemberton AO
Chair
FleetPartners Group Limited



Damien Berrell
Chief Executive Officer and Managing Director
FleetPartners Group Limited

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Appendix 1 Structure

The following controlled entities of FleetPartners Group Limited were wholly owned during the Reporting Period.

Australia	ACN
Fleet Aust Subco Pty Limited	132 478 570
Pacific Leasing Solutions (Australia) Pty Limited	121 168 447
Leasing Finance (Australia) Pty Limited	121 167 824
PLS Notes (Australia) Pty Limited	122 110 552
Fleet Holding (Australia) Pty Limited	121 167 815
Fleet Partners Pty Limited	006 706 832
FleetPlus Holdings Pty Limited	155 949 698
FleetPlus Pty Limited	099 217 320
FleetPlus Novated Pty Limited ⁷	103 571 740
PackagePlus Australia Pty Limited	120 804 908
Equipment Finance Holdings Pty Ltd	635 979 510
Fleet Partners Franchising Pty Limited ⁸	127 435 894
Eclipx Insurance Pty Ltd	606 104 483
CarInsurance.com.au Pty Ltd	606 104 590
Car Insurance Pty Ltd	605 397 939
Fleet Choice Pty Ltd	096 148 499
Accident Services Pty Limited	626 169 953
Leasing Finance Services Pty Ltd	616 058 023
FP Turbo EV Warehouse Trust 2021-1	Not applicable
FP Turbo Warehouse Trust 2021-1	Not applicable
FP Turbo Series 2023-1 Trust	Not applicable
FP Turbo Series 2024-1 Trust	Not applicable
FP Turbo Series 2025-1 Trust	Not applicable

New Zealand	Company Number
Fleet NZ Limited	2157542
FleetPartners NZ Limited	6446212
FleetPartners Holding (NZ) Limited	1853757
Pacific Leasing Solutions (NZ) Limited	1853755
Leasing Finance (NZ) Limited	1853756
PLS Notes (NZ) Ltd	1876538
FleetPlus Limited	1822105
FleetPartners NZ Trustee Limited	1876887
Truck Leasing Limited	462461
FP Ignition Trust 2011-1 New Zealand	Not applicable

7. Now known as NovateMyCar Pty Limited. The name change took effect on 19 December 2025.

8. Now known as Remunerator Pty Limited. The name change took effect on 24 November 2025.

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Appendix 2 Addressing the mandatory reporting criteria

Mandatory Criteria	Section in Statement	Page
1. Identify the reporting entity	Section 1	1
2. Describe the reporting entity's structure, operations and supply chains	Section 2	1
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that it owns or controls	Section 3	2
4. Describe the actions taken by the reporting entity and any entity that it owns or controls, to assess and address these risks, including due diligence and remediation processes	Section 4	3
5. Describe how the reporting entity assesses the effectiveness of these actions	Sections 5 and 6	4
6. Describe the process of consultation with any entities that the reporting entity owns or controls	Section 7	4
7. Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Section 4.2	3

