

MODERN SLAVERY ACT STATEMENT 2024

JOINT STATEMENT: PETER WARREN AUTOMOTIVE HOLDINGS LTD

1 Introduction

This joint Modern Slavery Statement, is made pursuant to the *Modern Slavery Act 2018* (Cth), and sets out the actions taken by:

- Peter Warren Automotive Holdings Limited (“PWAHL”)
- James Frizelle’s Automotive Group Pty Ltd (“JFAGPL”)
- Peter Warren Automotive Pty Ltd (“PWAPL”)
- Penfold Motors Burwood Pty Ltd (“PMBPL”)
- Warwick Farm Automotive Pty Ltd (“WFAPL”)

(together, “Reporting Entities”, “Peter Warren”, “us”, “we” or “our”) to assess and address modern slavery risks in our operations and supply chain and in our owned or controlled entities for the financial year ended 30 June 2024.

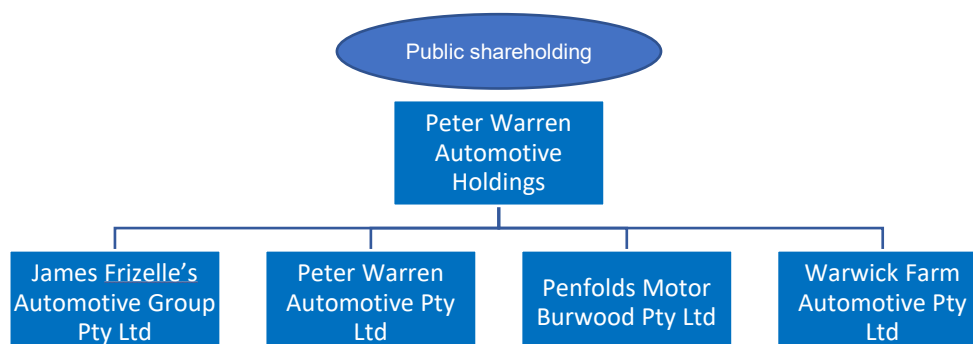
We remain committed to ethical business practices across our operations and our supply chain. As a collective Motor Vehicle Dealership Group employing approximately 2,300 staff, we have an important role in fostering ethical business conduct, that help to address modern slavery risks and protect human rights.

Our corporate values are G.I.F.T as set out below which aligns well with the commitments espoused in this Statement.



2 Structure, Operations and Supply Chains

The entities within our corporate structure that satisfied the consolidated revenue threshold in 2024 are shown in the diagram below:



Peter Warren Automotive Holdings Limited is a holding company that holds the shares in the trading entities and does not trade in its’ own right. In addition to the above diagram, PWAHL also wholly owns eight non-trading entities.

James Frizelle's Automotive Group Pty Ltd is a private company, wholly owned by PWAHL. JFAGPL operates in South East Queensland and Northern New South Wales, with the head office also located at 13 Hume Highway, Warwick Farm NSW 2170. JFAGPL wholly owns one non-trading entity.

Peter Warren Automotive Pty Ltd is a private company owned by PWAHL. PWAPL wholly owns two non-trading entities and Sydney North Shore Automotive Pty Ltd which is a trading entity. PWAPL is based in South West Sydney with the head office being located at 13 Hume Highway, Warwick Farm NSW 2170.

Penfold Motors Burwood Pty Ltd is a private company owned by PWAHL. PMBPL operates in Melbourne and holds majority interests in Burwood Mazda Pty Ltd and Bayside Mazda Pty Ltd. Its head office is located at 13 Hume Highway, Warwick Farm NSW 2170.

Warwick Farm Automotive Pty Ltd is a private company owned by PWAHL. WFAPL operates in South West Sydney with the head office being located at 13 Hume Highway, Warwick Farm NSW 2170.

Our operations are entirely based in Australia, in the Sydney region, regional New South Wales, South Eastern Queensland, Northern New South Wales and Melbourne region.

The Peter Warren Automotive Holdings network operates 80+ franchise operations and represents more than 30+ Original Equipment Manufacturers (OEMs) across the Volume, Prestige and Luxury Segments, with operations across the eastern seaboard under various banners including Frizelle Sunshine Automotive, Euro Collision Centre, in Southeast Queensland and Northern NSW, Sydney North Shore Automotive, Mercedes Benz North Shore, MacArthur Automotive, Bathurst Toyota and Volkswagen and its flagship operation, Peter Warren Automotive at Warwick Farm in South West Sydney, New South Wales along with Penfold Motor Group in Melbourne Victoria.

During the Reporting Period, PWAHL acquired Peter Warren Toyota at Warwick Farm, Bathurst Toyota and Bathurst Volkswagen, and Macarthur Mazda, Macarthur Nissan, Macarthur MG and Macarthur LDV at Campbelltown.

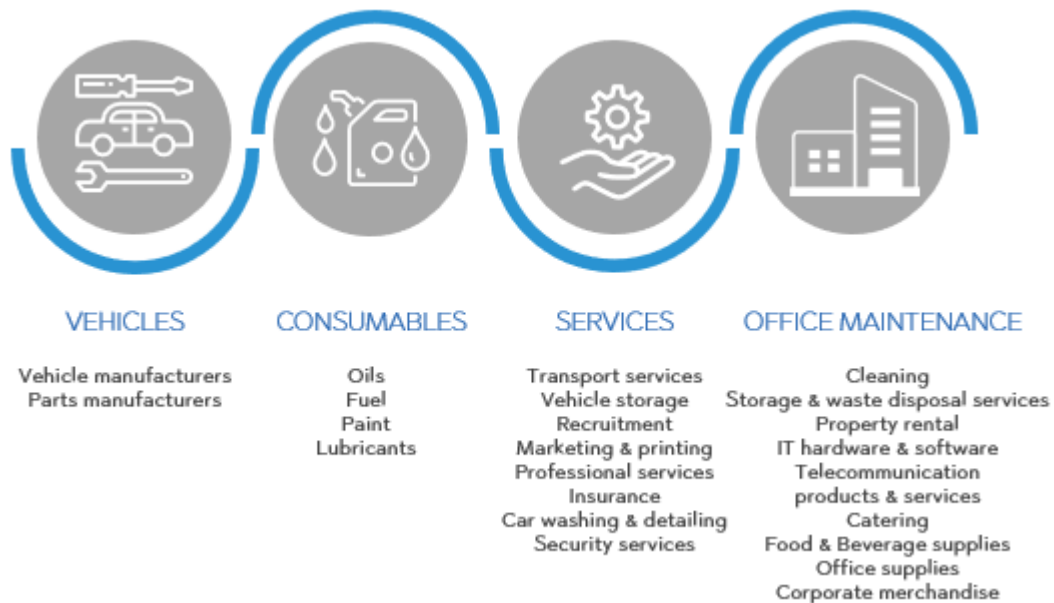


Our primary operations are the running of automotive dealerships. We also build and renovate dealerships as part of our operations. We operate integrated new and used Vehicle retailing businesses providing a full range of sales and support including, aftermarket products, parts and accessories, service and finance and insurance, to retail and wholesale customers. Further descriptions are set out below:

Offering	Description
New vehicle	<ul style="list-style-type: none"> The sale of new vehicles representing 30 OEM Brands across the eastern seaboard
Used vehicle	<ul style="list-style-type: none"> The sale of used vehicles
Aftermarket	<ul style="list-style-type: none"> Aftermarket products are the non-OEM products for sale by automotive dealers Products include window tinting, tyre and wheel protection, extended warranties, roof racks, tow bars and other accessories generally available at point of sale
Parts and accessories	<ul style="list-style-type: none"> Sale of parts and accessories for new and used vehicles Provision of parts to our service workshops Provision of parts to third party collision repair and servicing outlets Provision of parts to other dealerships
Service	<ul style="list-style-type: none"> Ongoing vehicle maintenance OEM warranty repairs Internal reconditioning of used vehicles for sale
Finance and insurance	<ul style="list-style-type: none"> Sale of third party finance and insurance products to customers

The most significant aspect of our supply chain is the purchase of new vehicles inventory from our OEMs. We finance these purchases through the use of floorplan arrangements with finance companies. Floorplan arrangements are short term loan arrangements used to purchase items of inventory which are repaid when the inventory is sold.

An overview of our supply chain is depicted in the diagram below:



Our supplier categories remain largely unchanged from year to year, so the geographic representation of our supply chain as depicted in our previous modern slavery statement is reflective of FY24. The majority of our non-OEM direct suppliers are based in Australia. The green dots denote the countries where our suppliers have business operations:



3 Modern slavery risks in our operations and supply chains

Peter Warren Automotive Holdings takes a risk-based approach to identifying and addressing the extent to which it may cause, contribute to, or be directly linked to modern slavery through its operation and supply chains.

Potential risks of modern slavery within our operation

Given that our operations, and the operations of our owned or controlled entities, are all based in Australia, our geographic risk remains low according to the Global Slavery Index.

Having regard to our ongoing compliance with the legal framework regulating employment practices in Australia and our policies and controls in place, the risk that we have caused or contributed to modern slavery in our operations remains low.

The Code of Conduct, Whistleblower Policy and Workplace Behaviour Policy also assist in mitigating the risk of modern slavery in our workplace.

Potential risk of modern slavery in our supply chains

Our risk assessment of modern slavery indicates risks are less likely to occur with direct suppliers, and more likely to occur further down the supply chain of Peter Warren Automotive Holdings. This includes suppliers operating in sectors generally considered higher risk for modern slavery, irrespective of geographic location, such as car washing and detailing, office cleaning, security and transport services. The risk profile of these sectors are heightened by the utilisation of unskilled workers on temporary visas with limited ability to negotiate their wages and rights in the workplace.

There is modern slavery risks in the supply chain behind the uniforms and corporate merchandise and furniture that we purchase, the lithium in our laptops and smartphones, construction materials used in our dealership renovations, the food and beverages we serve on our premises and hospitality services we purchase. The risks in these goods stem from the later tiers of our supply chain, over which we have limited visibility or control. However, through our supplier due diligence process, we have been able to get a better understanding of the risks beyond the first tier of our supply chain.

4 Actions taken to assess and address modern slavery risks

The actions taken to ensure the modern slavery risk is assessed and addressed include supplier review; implementation of relevant policies and procedures; and application of the due diligence process.

Supplier review

Management of the reporting entity regularly review the Modern Slavery Statements of key OEM partners to ensure their compliance with modern slavery requirements. When considering or onboarding a new supplier.

Policies and Procedures

During the reporting period, we continued the implementation of our workplace relations legal compliance framework, which in turn, mitigates the risks of modern slavery occurring in our direct workforce.

We continued to have in place our Supplier Code of Conduct and modern slavery contract clauses as part of our supplier agreement templates during the reporting period. Our Human Rights Policy also remained in place during the reporting period, and we monitored our grievance channels for any reports of any reportable conduct, including breaches of our Human Rights Policy.

Due Diligence

In previous years, we issued the modern slavery questionnaires (MSQ) to selected suppliers that provided goods or services. The average risk rating based on the completed questionnaires has been 4 (low) over a three year period. This reflects the stable nature of our supplier categories. As a result, the MSQ was not issued to suppliers during the 2024 reporting period. We may resume the processing of issuing the MSQ and reviewing results during the next reporting period.

5 Assessing the effectiveness of our actions

We seek to assess the effectiveness of our actions by setting goals designed to mature our approach to modern slavery mitigation and tracking against those goals. During the next reporting period, we will continue our efforts to progress the following goals:

Supply Chain

- Identify a smaller cohort of higher risk suppliers to receive the MSQ
- Engage with the suppliers identified as warranting further due diligence based on the MSQ results
- Engage with OEMs regarding modern slavery

Procurement

- Undertake a review of the procurement processes across the business to identify improvements in the way that modern slavery risks are considered at supplier selection
- Select key supplier agreements that included the modern slavery clause and ascertain the level of compliance with the clause by the supplier

Operations

- Roll out group-wide training on modern slavery with a view to raising awareness
- Conduct modern slavery risk assessments of acquisition targets as part of the due diligence process
- Continue to review reported cases via internal grievance mechanisms

6 Consultation

In order to prepare this joint statement, the Reporting Entities covered by this statement adopted a collaborative approach and consulted the entities they each own or control. Members of senior management were kept abreast of the framework established to assess and address these risks as well as in the preparation of this statement.

7 Approval

This statement was approved by the Board of Peter Warren Automotive Holdings Limited, the higher entity, on behalf of the Reporting Entities on 25 November 2024 and signed by Andrew Doyle, a responsible member of the higher entity.

Signed,



Andrew Doyle
Chief Executive Officer
19 December 2024

Modern Slavery Act 2018 (Cth) – Statement Annexure

Reporting criteria	Heading and page number/s
1. Identify the reporting entity.	Introduction, Page 1
2. Describe the reporting entity's structure, operations and supply chains	Structure, Operations and Supply Chains, Page 1
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Modern slavery risks in our operations and supply chains, Page 4
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Actions taken to assess and address modern slavery risks, Page 5
5. Describe how the reporting entity assesses the effectiveness of these actions	Assessing the effectiveness of our actions, Page 5
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Consultation and approval, Page 6
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A