

MODERN SLAVERY STATEMENT

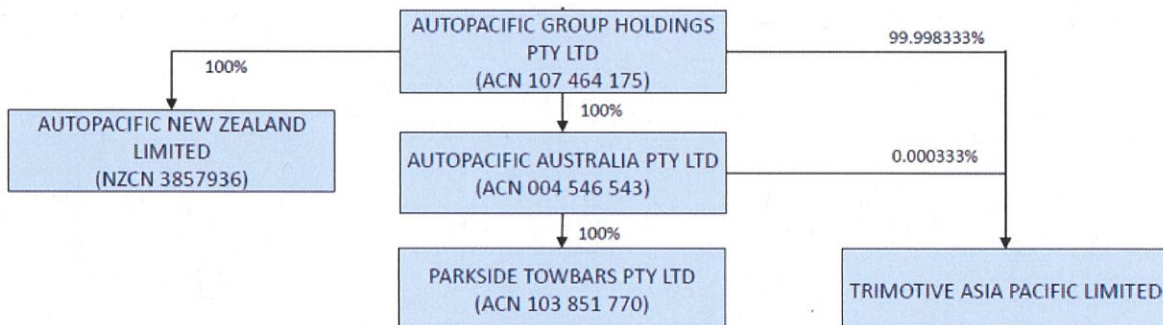
AUTOPACIFIC GROUP HOLDINGS PTY LTD

This statement has been prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (the **Modern Slavery Act**). The statement sets out the actions taken by AutoPacific Group Holdings Pty Ltd and its related entities (**AutoPacific**)¹ to address the modern slavery risks and efforts taken to maintain responsible and transparent supply chains.

Our structure

Established in 1951, out of a small South Melbourne Factory, AutoPacific is an Australian private company. AutoPacific is incorporated in Australia and headquartered in Melbourne, Victoria.

AutoPacific owns various subsidiary companies:



Our operations

AutoPacific is an industry leading designer, manufacturer and distributor of a wide variety of high-quality, custom-engineered towing, trailering, cargo management and other related accessory products in Australia, New Zealand and the Asia Pacific. Specifically, this entails the following subsidiary activities of:

- product design and manufacturing through designing complex products from concept to completion, specifically designed and manufactured for a dedicated vehicle model;
- warehousing and distribution with warehouses based in Melbourne and Sydney, Australia as well as Auckland, New Zealand;
- a broad network of distributors and retail partners along with vehicle manufacturers
- a customer service team.

AutoPacific employs approximately 600 employees, with the majority being in Australia. There are also a significant number of employees located in New Zealand and Thailand.

Our supply chains

Broadly speaking, AutoPacific is closely aligned with automotive importers, retailers, dealer networks and the end consumer as the category leader in the automotive and leisure market segments.

¹ AutoPacific means AutoPacific Group Holdings Pty Ltd (ACN 107 464 175) and its related entities.

AutoPacific's supply chains include manufacturing and distribution centres across sites in Australia, New Zealand and Asia. These sites also require services ancillary to its operations, such as cleaning, maintenance and security of sites in order to enable continuing operations.

AutoPacific's key areas of operation are:

- Sydney, Australia;
- Melbourne, Australia;
- Perth, Australia;
- Auckland, New Zealand;
- Christchurch, New Zealand; and
- Chon Buri, Thailand.

Policies and Governance

AutoPacific has a comprehensive framework in place that is designed to incorporate AutoPacific's values and commitments. Under its Modern Slavery Policy, all of AutoPacific employees, including its directors, agents, contractors and any other parties that represent our business, must adhere to and support AutoPacific's commitment to human rights and eliminating modern slavery practices within our supply chain.

AutoPacific has implemented the following broad suite of related policies:

Policies

- Ethical Sourcing and Modern Slavery Policy
- Whistleblower Policy
- Code of Conduct

Governance

AutoPacific has inducted Board members into the risks associated with Modern Slavery and the necessary due diligence and risk assessment required to manage modern slavery risks. AutoPacific has also required that a senior internal director will have oversight of and continuously review and consider AutoPacific's compliance with this Statement and Auto Pacific's Policies and report back to AutoPacific's Board on an ongoing basis regarding AutoPacific's compliance.

Programs

AutoPacific has implemented programs to address modern slavery within its organisation that increases Modern Slavery risk identification processes in relation to AutoPacific's suppliers. This will be augmented by the introduction of additional training for employees involved in supply chain and procurement.

Risks Assessments

The identification of Modern Slavery risks is a primary concern for AutoPacific. AutoPacific's commitment to its Modern Slavery Policy and emphasis on human rights is a focus for AutoPacific. This focus is continued and sustained by its effort to adhere to the principles and obligations under the Modern Slavery Act.

Sector and industry risks

AutoPacific operates almost solely in the manufacturing sector, which has certain risks. Through its policies and corporate obligations, AutoPacific has identified the following areas that may pose risks:

- Labour rights, including forced or compulsory labour, wages and benefits, work hours and child labour (including unskilled, temporary or seasonal labour)
- Health and safety (for workers that AutoPacific do not control (or who are otherwise engaged in operations outside of AutoPacific's control))

In response to these risks, AutoPacific is committed to identifying and managing any potential risks. These include:

- Increased engagement with stakeholders regarding the risks associated with the global employment framework implemented across AutoPacific and its subsidiaries resulting in the need to ensure all local laws are met (as a minimum); and
- Complaint procedure open to all employees of AutoPacific

Ultimately, these measurements in place enable AutoPacific to adequately address the modern slavery risks that it faces.

Product and services risk

As a by-product of operating in manufacturing AutoPacific, certain product and service risks arise. In much the same way that AutoPacific tackles risks related to its sector and industry, AutoPacific seeks to incorporate measures that allow full coverage on any issues that may arise. This includes increased engagement with stakeholders, which aims to ensure its business partners that provide products and services are competent and meet their human rights obligations.

Geographic risks

AutoPacific understands that the countries in which it operates in may not be subject to the same standards expected of AutoPacific in its country of origin. For example, a disparity between international conventions that some countries have and have not signed.

As such, AutoPacific is committed to identifying countries that are imperative to AutoPacific's business operations and taking active steps to ensure that AutoPacific's operations maintains appropriate standards that do not expose AutoPacific to modern slavery risks.

Other areas of concern

AutoPacific acknowledges its operations are far-reaching. In order to capture as many modern slavery risks, AutoPacific is committed to introducing a policy which seeks to address these considerations as they may arise.

AutoPacific is also committed to undertaking ongoing due diligence on all of its local and global supply chains to determine risks it does not currently have visibility over.

Effectiveness of AutoPacific's actions (measurements for Modern Slavery obligations)

AutoPacific's effectiveness in tackling and tracking the management of our modern slavery risks are best shown through AutoPacific's training programs. The program will allow AutoPacific to monitor its performance and determine if the Modern Slavery Policy has been implemented effectively.

Workforce Training

It is imperative that all employees are aware of their obligations under our compliance policies and have access to further information about them when required.

Collaboration

AutoPacific seeks to be the best. AutoPacific is committed to working with non-government organisations, employees and their representatives to improve its modern slavery response.

AutoPacific will continue to review:

- the Annual Trafficking Persons Reports to ascertain which specific countries that AutoPacific operates in are attempting to combat modern slavery;
- the US Department of Labour List of Goods Produced by Child or Forced Labour to identify any goods used by AutoPacific that may have a high risk of modern slavery;
- the Fair Work Ombudsman website to ensure contract arrangements are managed and monitored in accordance with Australian employment law.


AutoPacific will also seek to work alongside non-government organisations to ensure that it is constantly aware of modern slavery risks in its supply chain, and so as to avoid inadvertent engagement with modern slavery practices.

Future plans

Over the next year, our focus will be on:

- further assessment of the potential modern slavery risks in its operations and supply chains with an emphasis on high risk geographical locations and business transactions
- developing and reviewing its policies on modern slavery in operations and supply chains
- developing training for all employees on modern slavery requirements
- conducting due diligence on local and global supply chains
- reviewing supplier contracts to ensure they contain terms that are consistent with the Modern Slavery Act
- taking steps to address any potential modern slavery risks identified.

This statement was approved by the Board of AutoPacific Group Holdings Pty Ltd on Friday 25th June 2021.



Jason Kieseker

Director

25th June 2021