

### Polaris Sales Australia Pty Ltd (ACN 088 081 949)

### **Modern Slavery Statement**

### November 2025

### **Financial** year

- 1. This modern slavery statement relates to Polaris Sales Australia Pty Ltd (**Polaris**) for the financial year beginning 1 January 2024 and ending 31 December 2024 (**Reporting Period**).
- 2. We are a *reporting entity* under the *Modern Slavery Act 2018* (Cth) (the **Act**) and accordingly give the Minister this modern slavery statement (**Statement**) under section 13 of the Act.
- 3. This Statement sets out the steps that we have taken and will be taking to ensure that business practices that compromise fundamental human rights, such as slavery, trafficking in persons and child labour are not taking place in our own business or in our supply chains.

#### Introduction

- 4. We are committed to a programme of continuous improvement in our business practices to combat modern slavery in our supply chains and in our business. It is our policy to conduct all business ethically and in accordance with the Act, as amended from time to time.
- 5. We are committed to acting ethically in all our business dealings and relationships wherever we operate, and to implement and enforce effective systems to counter modern slavery practices. We will uphold all laws relevant to countering modern slavery in all the jurisdictions in which we operate.

#### Structure, business and supply chains

6. As the global leader in powersports, Polaris Inc. (NYSE: PII) pioneers product breakthroughs and enriching experiences and services that have invited people to discover the joy of being outdoors since our founding in 1954. Polaris' high-quality product line-up includes the Polaris RANGER®, RZR® and Polaris GENERAL™ side-by-side off-road vehicles; Sportsman® all-terrain off-road vehicles; military and commercial off-road vehicles; snowmobiles; Indian Motorcycle® mid-size and heavyweight motorcycles; Slingshot® moto-roadsters; Aixam quadricycles; Goupil electric

- vehicles; and pontoon and deck boats, including industry-leading Bennington pontoons. Polaris enhances the riding experience with a robust portfolio of parts, garments, and accessories.
- 7. Polaris Inc., a Delaware corporation, was formed in 1994. The terms "Polaris," the "Company," "we," "us," and "our" as used herein refer to the business and operations of Polaris Inc., its subsidiaries and its predecessors, which began doing business in 1954.
- 8. The Polaris Group is headquartered in Medina, Minnesota, employs around 16,000 employees and serves 100+ countries. We are organized into three businesses:
  - (a) off Road, which includes our Off-Road Vehicles (ORV) and Snow business, which is inclusive of the respective Product Garments and Accessories (PG&A) revenue.
  - (b) on Road, which is inclusive of the respective Product Garments and Accessories (PG&A) revenue.
  - (c) marine, which is inclusive of the respective Product Garments and Accessories (PG&A) revenue.
- 9. Polaris Sales Australia Pty Ltd is indirectly fully owned by Polaris Inc.
- 10. Polaris Sales Australia Pty Ltd owns and controls a New Zealand branch Polaris Sales Australia Pty Ltd that has two employees.
- 11. Our business activities include the importation, distribution, sales and marketing of Polaris vehicles and Indian Motorcycle in Australia & New Zealand. We do not manufacture any of the Polaris and Indian Motorcycle products in Australia or New Zealand.
- 12. Our suppliers are Polaris Industries Inc. and its subsidiaries, which operate globally. In a small number of cases, we may purchase parts and accessories from other local suppliers which are based in Australia and New Zealand.
- 13. We also engage other service providers who assist with our business operations including, Freight, IT contractors, recruitment agencies and third party commercial real estate, cleaning and office services. These third parties are based in Australia.

# Risks of modern slavery

14. The risks of modern slavery in our operations and supply chain in Australia are low. Our service providers are all located in Australia where there is an overall low modern slavery geographic risk. The Polaris Group manages manufacturing and have significant processes and controls to identify and address modern slavery risks in the supply chain and business operation.

### Assessing and addressing modern slavery risks

#### Our policies on slavery

- 15. We have policies in place that mitigate the risk of modern slavery in our operations and supply chains.
- 16. Our employees are required to comply with the Polaris Code of Conduct (the" Code"), which is a global document issues by the Legal, Ethics and Compliance Department. The Code of Conduct informs staff that if they encounter a situation that might have ethical implications, it is important to alert someone immediately. This would include modern slavery violations which would

implicate our Human Rights Policy. Under the Code, employees have multiple avenues to raise concerns, including speaking with a manager or leader, contacting Human Resources, the Legal department, or the Global Head of Ethics & Compliance. Code violations may result in disciplinary action.

- 17. Specific contact details are provided within the Code for:
  - (a) Internal Audit VP, Internal Audit;
  - (b) Human Resources
  - (c) Legal General Counsel; and
  - (d) Ethics & Compliance Global Head of Ethics & Compliance
- 18. In addition, employees can:
  - (a) call the Polaris Business Ethics Hotline with is available 24 hours a day, 365 days a year. The Hotline is managed by an independent third-party provider (EthicsPoint) whose trained representatives will ask specific questions about the situation and submit a report to us for investigation. Each call is assigned a reference number so the employee can provide additional information or check on the status at any time; or
  - (b) complete an Online Report by visiting our external, secure server managed by Ethics Point. Employees can submit an online report by accessing the "Reporting Violations" link on our company intranet or www.ethicspoint.com. Employees complete a form that enables us to investigate and take appropriate actions; or
  - (c) contact the Polaris Sales Australia Managing Director or Human Resources.
- 19. If an employee reports in good faith a potential breach of the law or Code and if they cooperate in a company investigation, they are expressly protected against retaliation, harassment, or discrimination.
- 20. All Polaris suppliers are expected to adhere to our Supplier Code of Conduct and Human Rights Policy. Suppliers are also expected to complete a compliance survey twice a year and sign off on their commitment to these policies.
- 21. Respecting human rights in the workplace and across our global supply chain is important to Polaris. Our human rights policies requires that Polaris and each supplier maintain a workplace free from harassment, discrimination, child labour, forced labour and any other forms of compulsory labour. It also requires safeguards against human trafficking anywhere within our operations and supply chain. The Policy outlines our expectation that we and our suppliers comply with all applicable labour, wage and hour laws, as well as all applicable health, safety and environmental laws and regulations to provide a safe and healthy work environment.
- We are committed to respecting the privacy and rights of employees and third parties, and we require our suppliers to do the same.
- 23. We are not aware of any report either internally or to Ethics Point during the Reporting Period relating to modern slavery.

#### **Assessing Effectiveness of Actions**

24. Confirming that modern slavery practices are not taking place in our business and supply chains is and will always be a work in progress since we will regularly conduct due diligence exercises and risk assessments of our suppliers in relation to modern slavery prevention practices. Where such exercises and assessments suggest a risk of modern slavery, we will request the relevant supplier to investigate and redress where necessary, and to update us accordingly. Where a supplier fails to satisfactorily redress a risk area, we may decide to cease using the supplier.

### **Supply Chain Management**

- 25. Polaris remains focused on maintaining rigorous supply chain management processes. In 2024, Polaris implemented an updated supplier relationship management tool, JAGGAER. The platform centralizes supplier onboarding, supplier profile management, supplier risk management, sourcing event management and contract lifecycle management for much of our business.
- 26. In addition to our enhanced capabilities, the JAGGAER platform gives us access to new tools that enable strategic sourcing processes and provide increased compliance, transparency, and reduced operational costs.

### **Supplier Onboarding Process**

27. When bringing on a new supplier, Polaris facilitates a thorough review of key metrics including manufacturing processes and finances during the onboarding process to check for any potential issues at the start of the relationship. In 2024, Polaris refined this audit process based on previous learnings to help further our continuous improvement efforts. Supplier Screening Process.

### **Supplier Screening Process**

- 28. Polaris has built upon the compliance assessment we completed in 2023 around specific risk indicators, including due diligence reviews in partnership with Diligent (formerly Steele Compliance) to check our current known supplier list against third-party databases, screening for reputational and business risks. Polaris worked with Assent Compliance and Sayari to enhance our supplier screening and due diligence programs to uncover potential risks related to human trafficking, forced, and child labour.
- 29. Partnering with external insight and expertise, Polaris worked with Assent to conduct surveys of its entire supply base in 2024 to collect data on their understanding of and compliance with Environmental, Social, and Governance (ESG) measures and protocols. These surveys covered topics ranging from bribery and corruption, labour rights, business continuity, environmental policies and health and safety, and responses are followed up with as needed to gain additional information.

# **Due Diligence Processes for Modern Slavery Prevention**

30. Within the coming financial years, Polaris will review our due diligence exercises that are conducted in the process of selecting suppliers to cover the question of modern slavery, in order to assess how suppliers manage the risk of modern slavery in their operations and supply chains.

# **Steps Taken to Assess and Manage Any Risks**

31. Polaris regularly assess the risk of modern slavery in our business and supply chains, determine steps necessary to manage that risk, and implement remediation actions as needed.

**Training** 

32. In 2024, Polaris required training for certain employees on how to identify and prevent business

practices that can lead to forced labour in supply chains.

33. In furtherance of our commitment to compliance with laws that address modern slavery, we will

work to continuously improve training for relevant employees.

**Future action** 

34. In 2025, we will focus on making data-driven decisions to elevate our sourcing organization to a

world-class standard.

35. We intend in the coming years to take the following steps in order to improve our modern slavery

control framework:

(a) to review all relevant policies to confirm they address modern slavery issues in

accordance with the Act; and

(b) to review our standard contracts and terms and conditions of purchase to confirm

they address modern slavery in our supply chain.

36. We are committed to verifying that there are no modern slavery violations in our supply chains

or in any part of our business operations.

Consultation with entities we own or control

37. Polaris Sales Australia Pty Ltd does not own or control any other entities in Australia that are

considered a reporting entity under the Modern Slavery Act and therefore consultation is not required.

Attestation and approval

38. Our Managing Director for Polaris Sales Australia received a briefing on modern slavery

requirements of the Act prior to approving this Statement.

39. This Statement was approved by the Board of Directors of Polaris Sales Australia Pty Ltd on 5 November 2025 and Glenn Veal, Managing Director of Polaris Sales Australia was authorised to

sign this Statement on behalf of the Board of Directors.

40. This statement is made pursuant to the Act and has been approved by all the Directors for Polaris

Sales Australia Pty Ltd on 5 November 2025.

Glenn Veal

**Managing Director** 

Polaris Sales Australia and New Zealand Pty Ltd

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5 November 2025