

Sailun Australia

Modern Slavery Statement 2025

1 Introduction

Sailun Group Co. Ltd (**Sailun Group**) operates two Australian subsidiaries:

- (a) Australia Retreading Technology Pty Ltd (ACN 683 199 797) (**ART**); and
- (b) ANZ Management Pty Ltd (ACN 656 365 383) (**ANZ**),
(together, **the Sailun Australia Group**)

The Sailun Australia Group is committed to identifying and addressing the risks of modern slavery within its operations and supply chains.

This statement offers a transparent overview of the Sailun Australia Group's organisational structure, operations, and supply chains. It identifies potential risks related to modern slavery and outlines the proactive measures being taken to mitigate them. The Sailun Australia Group is committed to fostering collaboration and driving continuous improvement in support of human rights and ethical business practices.

2 Reporting entity

The reporting entities covered in this statement are **Australia Retreading Technology Pty Ltd (ACN 683 199 797)** and **ANZ Management Pty Ltd (ACN 656 365 383)**.

The Sailun Australia Group's registered Australian office is 150 Northbourne Road, Campbellfield VIC 3061.

This modern slavery statement relates to the period 1 July 2024 to 30 June 2025.

3 Sailun Group Co. Ltd structure, operations and supply chains

In this statement, the collective name "the Group" or "Sailun Group" is used to refer to Sailun Group Co. Ltd and its global subsidiaries including ART and ANZ. The collective name "the Sailun Australia Group" refers solely to ART and ANZ.

Global Operation

Sailun Group's operations are located in Asia, Mainland China, North America, Europe, Global South and Global North.

The countries where Sailun Group's factories are located include China, Vietnam, Cambodia, Indonesia, and Mexico.

Sailun Group is headquartered in Qingdao, China.

Australia Operation

ART is a wholly owned subsidiary of Sailun International Holding (Singapore) Pte. Ltd. (**SIHS**).

ART operates a tyre retreading factory in Australia, specialising in waste tyre remediation, material recovery, and the production and sale of retreaded tires.

ANZ is a wholly owned subsidiary of Sailun International Holding (Hong Kong) Co., Limited (**SIHHK**).

ANZ together with Sailun Group (Hong Kong) Co., Limited (**SGHK**), distributes Sailun Group's specialised tires, all-steel tires and semi-steel tires produced in its global facilities within Australia. ANZ's and SGHK's customer base consists primarily of distributors, dealers, and other wholesale clients.

ART operates a local tyre retreading factory in Australia for waste remediation and materials recovery services.

As of 26 December 2025, ART has 1 employee.

ANZ acts as a distributor within Australia for Sailun Group's specialised all-steel and semi-steel tyres produced by Sailun factories in China, Vietnam and Cambodia.

As of 26 December 2025, ANZ has 6 employees in total.

The Sailun Australia Group procures goods across several broad procurement categories, including:

- treads;
- base rubber;
- auxiliary materials for retreading; and
- finished tires produced by Sailun factories in China, Vietnam and Cambodia.

ART procures treads from Sailun Group's factory in Qingdao, China. Base rubber is procured from its Malaysian supplier. Auxiliary materials for retreading such as tire repair fluid are procured in Australia directly from local material stores.

The finished tire products sold within Australia are produced in factories in China, Vietnam and Cambodia.

The Sailun Australia Group supply chain includes third-party services provided to the Sailun Australia Group directly by supply of goods, facilities services, and professional services. By engaging these services through a third party we may be indirectly contributing to modern slavery practices.

The Sailun Australia Group does not own or control other entities.

Neither ART nor ANZ holds shares in any other company.

4 Risk of modern slavery practices

Modern slavery refers to situations where individuals are exploited by others for personal or commercial gain and are prevented from refusing to or leaving, due to threats, violence, coercion, deception, or abuse of power.

The Sailun Australia Group remains committed to identifying and addressing the risk of modern slavery practices in our operations and supply chains.

The Sailun Australia Group appreciates that the risks of modern slavery may be present in its supply chains as a result of the geographical location of some suppliers and source materials used in products supplied to Sailun Group. In particular, the Sailun Australia Group acknowledges that natural rubber sourced from China and Malaysia may carry potential risks of modern slavery.

Sailun Group's supply chain includes synthetic rubber, carbon black, nylon cord and other raw materials. Sailun Group recognises that these are high risk sectors and that by engaging these services through a third party, we may be indirectly contributing to modern slavery practices.

Sailun Group also recognises there is risk of it being indirectly linked to modern slavery, as our suppliers may source products or raw materials from overseas companies connected with modern slavery.

5 Actions to assess and address risks

Sailun Group has taken a number of actions to assess and address the risks of modern slavery throughout its operations and supply chains. To the extent the below refers to Sailun Group policies or procedures, these documents apply to the Sailun Australia Group.

We are assessing and addressing the risk of modern slavery practices occurring within both our business and our supply chain by taking the following actions:

Training and procedures

Employees undertake a range of training and are expected to comply with relevant policies and procedures. Sailun Group ensures compliance by:

- development of online courses which have been uploaded to Sailun Group's learning platform for all employees to study and which include topics of anti-discrimination and anti-harassment, human rights, anti-child labour and forced labour, and anti-human trafficking;
- a Business Ethics Manual applicable to all Sailun Group's employees, representatives and partners which mandates compliance with the prohibition of forced labour, child labour, and discrimination and which requires a safe and healthy workplace;
- publication of, and adherence to, a Child & Illegal Labour Policy to address the recruitment and employment practices of Sailun Group regarding child labour, forced labour, human trafficking, and slavery;
- publication of a Global Human Right Policy which outlines Sailun Group's commitment to respect for human rights, prohibition of discrimination and harassment, safety and health, and fair compensation;

- a Supplier Code of Conduct which sets out the compliance requirements that Sailun Group expects of all its suppliers to meet with respect to working conditions, human rights, health and safety and business ethics. The Code permits Sailun Group to inspect and evaluate a supplier's compliance with the Code and Suppliers are to actively cooperate and provide materials necessary for inspections and evaluations. Suppliers are to also conduct appropriate due diligence and require sub-suppliers to comply with the Code. Violation of the Code by suppliers amounts to a material breach of contract which may result in termination of the contract;
- a Supplier Policy Statement which communicates Sailun Group's expectation of its suppliers to act with honesty and integrity and to take all appropriate steps necessary to ensure compliance to operate within all laws and guidelines;
- a Modern Slavery Position Statement which outlines Sailun Group's commitment to combat slavery and human trafficking in its own business and in the wider supply chain system;
- a Sustainable Natural Rubber Policy which describes Sailun Group's goal to increase the proportion of sustainable procurement. Suppliers with excellent performance are given priority opportunities while suppliers that do not meet the requirements are rectified or eliminated;

Due diligence

Within the business

Sailun Group prohibits the use of forced labour and human trafficking. Sailun Group has in place several procedures to proactively manage this risk.

Some ways Sailun Group ensures its due diligence includes:

- ensuring all workers within Australia are provided with a written contract in a language that they understand, where the terms of their employment, including wage rates and hours of work, are clear;
- regularly conducting anonymous employee satisfaction surveys through online questionnaires which allow employees to provide feedback on various aspects including corporate culture, compensation and benefits and internal communication;
- providing comprehensive oversight of Sailun Group's business ethics work, offering expert opinions to ensure fairness through its Strategy and Sustainable Development Committee;

Within our supply chain

We are committed to partnering with suppliers that share our view and stance on modern slavery.

As part of our local initiative, we have undertaken the following due diligence procedures with respect to our suppliers:

- evaluating suppliers during onboarding and conducting annual reviews through procurement questionnaires and on-site assessments;
- requiring suppliers to provide relevant evidence to demonstrate compliance with applicable policies such as the Supplier Code of Conduct and the Business Ethics Manual;
- introducing measures as part of Sailun Group's contracting process which involves negotiating contractual requirements for suppliers to comply with all applicable anti-slavery and human trafficking laws;

Reporting, audit and compliance

Sailun Group continues to evaluate the nature and extent of its exposure to the risk of modern slavery occurring in its business and supply chain. Specifically, Sailun Group:

- has implemented group-wide channels in which workers are able to make reports of any misconduct or irregularities which are accepted by Sailun Group's Discipline Inspection Commission for investigation;
- conducts independent ethics audits through its Audit and Internal Control Department which regularly reviews Sailun Group's operations and identifies potential risks over all operating sites every three years. Violations are promptly reported and findings are shared with the Compliance Working Group;
- conducts a comprehensive review of its systems to identify and evaluate risks areas within its supply chains;
- is in the process of implementing measures to prevent and mitigate the risks of slavery and human trafficking; and
- guarantees whistleblower protection in accordance with its Whistleblower Policy.

Sailun Group recognises that its review and assessment of its actions to identify and address our modern slavery risks in operations and across its supply chain will be an ongoing and evolving process that it is committed to continue to build upon. To this end, Sailun Group have commenced and will continue to work on developing frameworks and processes to ensure it can review the effectiveness of the actions it is taking to assess and address modern slavery risks in its operations and supply chains.

6 Consultation process

In accordance with Sailun Group's Business Ethics Manual, Sailun Group has established open compliance consultation channels to enable employees to obtain guidance, feedback, and suggestions regarding compliance issues.

Consultation content will be kept confidential as requested by employees.

Sailun Group encourages and supports the reporting of violations or suspected violations of this manual. Reports can be submitted either anonymously or under real name through Sailun Group's internal network link or other available channels.

Sailun Group will designate dedicated personnel to handle reports and strictly protect reporters' privacy information. Sailun Group strictly prohibits disclosing report content or personal information such as the reporter's name, address, phone number, and forbids transferring report materials to reported individuals or entities. Retaliation against whistleblowers is prohibited, and any obstruction of reporting activities will be strictly addressed. These measures aim to safeguard whistleblowers' lawful rights and interests, ensuring comprehensive confidentiality and protection throughout the reporting process.

7 Other relevant information

Following a review of the effectiveness of the steps we are taking this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

continue to review our modern slavery awareness training and track attendance to ensure it remains legally compliant, up-to-date and relevant; and

consult and review responses provided by global entities to understand due diligence for Global procurement impacting the Company for any ongoing improvements and alignment.

This statement is made pursuant to section 16 of the Modern Slavery Act 2018 (Cth) and has been reviewed and approved by the Board of Australia Retreading Technology Pty Ltd on 22 December 2025 and the Board of ANZ Management Pty Ltd on 22 December 2025.



Geng Ming

Director of

SL ANZ MANAGEMENT PTY LTD

26 December 2025



Liu Jiyan

Director of

**AUSTRALIA RETREADING TECHNOLOGY
PTY LTD**

26 December 2025