

ANGLE AUTO FINANCE MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR ENDING 30 JUNE 2024

INTRODUCTION

The term 'Modern Slavery' encompass various forms of coerced labour or exploitation, including as a result of threats, violence, human trafficking, forced marriage, debt bondage, deceptive recruitment, coercion, abuse of power or deception. Where Modern Slavery occurs, it can have severe consequences for victims and involve grave abuses of human rights and criminal liability. The nature and extent of Modern Slavery in a complex and interconnected world economy, means there is a high risk that it may be present in any entity's operations and supply chains across every industry, sector and geographic location. Modern Slavery is often linked to other crimes and activities that adversely impact human rights, such as corruption and environmental damage.

Additionally, Modern Slavery distorts global markets and undercuts responsible business. If not addressed, Modern Slavery can pose substantial legal and regulatory and reputational risks to an organisation and to its broad network of internal and external stakeholders.

Angle Auto Finance (AAF) recognises the fundamental importance of protecting human rights and understands and appreciates the significant adverse impact that Modern Slavery can have on people, communities, businesses and economies. AAF does not tolerate any forms of slavery and human trafficking under any circumstances, regardless of the industry, sector or location and remain committed to ensuring Modern Slavery is not evident or accepted within our business operations or supply chain. AAF is committed to a continuous improvement approach to the effective identification, review and management of the risk of Modern Slavery within our business operations and supply chain, which will inform reporting in future Modern Slavery Statements.

ABOUT ANGLE AUTO FINANCE

AAF is a financier based in Australia which provides wholesale, personal and commercial loans for motor vehicles, trucks and caravans via a network of dealers and novated lease introducers. AAF is 80% owned and controlled by Cerberus and 20% owned by Deutsche Bank.

AAF acquired Westpac's Auto Finance business and commenced trading in December 2021 by providing wholesale finance facilities and novated leases. Retail consumer and commercial loans were provided at scale from March 2022.

AAFs current product offerings include:

- RETAIL
 - o Consumer Loans
 - o Commercial Loans (individual & company)
 - o Novated Leases
- WHOLESALE
 - o Bailment Loans
 - o Capital Loans

HOW AAF ASSESSES AND MANAGES MODERN SLAVERY RISKS

AAF has a strong focus on building, implementing and continuously improving robust risk management processes and controls to ensure the ongoing success of our business, and protection of our people, partners, customers and community.

INTERNAL WORKFORCE - EMPLOYEE WELFARE

As a financial services provider, AAF is not considered to operate within a high-risk industry with respect to Modern Slavery, nor do we produce goods or provide services that are considered to be at high risk of Modern Slavery. Furthermore, as an organisation which operates solely in Australia, AAF's internal business operations must comply with Australia's strict labour and employment laws.

AAF provides a safe and secure work environment for all our people, customers, visitors, and external workers in line with the requirements set out within the relevant jurisdictional Work Health & Safety Acts and Regulations and ensures



all employment contracts meet the minimum requirements set out within the National Employment Standards, Fair Work Act 2009 and relevant Modern Award.

Additionally, AAF provides a number of employee benefits and support services including Wellbeing & Lifestyle Leave, Birthday Leave, Employee Assistance Program and Whistleblower service. AAF also offers flexible ways of working to ensure a suitable work life balance can be maintained for all employees. Furthermore, AAF is committed to assisting employees experiencing discrimination, harassment or abuse sustained within or external to the workplace. AAF has in place relevant Policies, specifically Code of Conduct, Anti-discrimination Harassment and Bullying Policy, Diversity Equity and Inclusion Policy, Grievance Policy and Concern Raising (Whistleblower) Policy. Our employees and contractors are required to complete mandatory training on Work Health & Safety as well as Respect@Work.

As documented within AAF's Board approved Risk Appetite Statement, AAF has a 'low' appetite for People Risk as well as Legal & Regulatory Compliance Risk. Therefore, in addition to external regulator reporting and oversight requirements, to ensure AAF continue to comply with applicable laws and maintain a safe and secure work environment for all our staff, AAF has put in place a number of internal controls to mitigate the risk of modern slavery within its internal operations. These controls include automated and manual processes, policies and procedures, and mandatory training programs.

To ensure these controls remain current and effective, there are a number of oversight and governance practices in place which enable deficiencies to be identified and addressed. This includes risk and control self-assessments, quality assurance and control testing, incident reporting, data analytics and reporting, independent auditing. To date, there have been no findings that suggest Modern Slavery evident and/or at risk of occurring within our organisation.

A Work Health & Safety Audit was undertaken in January 2022 and all recommendations from this audit have now been implemented. In addition, quarterly reporting is provided to ensure our AAF Officers are satisfied on all due diligence requirements established un the Model Work Health and Safety Act.

To date, there have been no adverse findings or claims against AAF in respect to National Employment Standards, Fair Work Act, Modern Award or Work Health & Safety Acts or Regulations.

Giving consideration to the factors outlined above, we would assess at the date of this statement that the risk of Modern Slavery existing amongst our internal workforce is extremely low, however this will be continuously assessed over time.

FINANCIAL CRIMES

AAF is committed to protecting vulnerable people and communities which may become victims of Modern Slavery as a result of acts of financial crime.

As a financial services provider, AAF is exposed to financial crime risks with the potential to unknowingly fund criminal activity. As documented within the Board approved Risk Appetite Statement, AAF has a 'low' appetite for Legal & Regulatory Compliance Risks, including those which relate to Money Laundering and Terrorism Financing laws.

As such, strong controls have been put in place with respect to Anti-Money Laundering and Counter Terrorism Financing (AML & CTF), including automated screening at the point of application and ongoing, regular training programs for staff, directors and partners, policies, procedures and an external audit program.

A thorough self-assessment of the AML & CTF Program is completed each year and reported to relevant committees and the Board. Required annual reporting is completed to AUSTRAC. Additionally, an audit of the AML & CTF Program is completed on a three yearly basis by an independent external provider. To date, there have been no material instances of non-compliance identified.

Giving consideration to the factors outlined above, AAF is confident that financial crime risks associated with Modern Slavery are well managed within the organisation and will continue to be closely monitored and assessed over time.



SUPPLY CHAIN

AAF is committed to ensuring that it does not engage suppliers that breach Modern Slavery legislation and is dedicated to holding suppliers accountable to their commitment of eradicating Modern Slavery. AAF will not knowingly engage suppliers that do not align with its position on enforcing basic human rights and reserves the right to terminate any contractual arrangement if it believes an actual or potential breach has/may occur.

As documented within the Board approved Risk Appetite Statement, AAF has a 'low' appetite for Third Party Risks, including those that relate to external suppliers. In line with this, AAF's supply chain is relatively small and is made up of suppliers and outsourced service providers from industries across professional services, communications, financial, credit & insurance services, recruitment, technology, and travel.

These suppliers are generally Australian based, or large multinational organisations which are required to comply with Australian and/or international employment and labour laws as well as international human rights standards. Additionally, with the exception of the procurement of electronic goods for staff and office use (such as laptops and mobile phones), AAF does not deal with any suppliers that manufacture goods or provide services considered to be at high risk of Modern Slavery. A small number of AAF's overseas suppliers operate out of India and the Philippines, where Modern Slavery is known to be prevalent. However, these are reputable global organisations who provide services that are not considered to be at high risk for Modern Slavery.

As the organisation grows and matures, AAF continues to invest in and mature its Procurement function. This program of work incorporates the following completed and in progress actions:

- The Procurement function has been created and resourced. This includes the creation of a centralised contracts repository for all third-party contracts executed by AAF which also records key contract information.
- The Procurement Policy has been developed, approved and published and the majority of requirements within it have been operationalised. The policy is regularly reviewed and updated to ensure it remains aligned with applicable legal and regulatory requirements and organisational needs,
- Standard Contract Terms are in place which mandate that all suppliers must comply with applicable laws & regulations including without limitation, laws & regulations in relation to anti-bribery and corruption, antimoney laundering and terrorism financing, privacy and data security.
- New Standard Contract Terms were operationalised in Q4 2023 which include a clause pertaining to Modern Slavery requiring the supplier to:
 - Attest that it has not been convicted of a Modern Slavery offence;
 - Have completed its own due diligence on its internal business operations and supply chain; and
 - Provide commitments to eradicating Modern Slavery within its own supply chains.
- All existing contracts will continue to be reviewed (including at end of term or any other available contract renewal times) and where relevant contracts do not include relevant Modern Slavery clauses, we will endeavour to include these clauses.
- Supplier Risk Assessments: A key component of the Procurement Policy is the requirement to complete a Supplier Risk Assessment (SRA) on all new material engagements (to be repeated on an annual basis). The SRA covers a range of risks, including Modern Slavery which are addressed by requesting thorough due diligence (covering anti-bribery and corruption, modern slavery and other business ethics checks) for all outsourced arrangements, as well as regularly reviewing supplier agreements. The SRA process has been implemented and is currently the subject of annual review, ahead of a formal re-launch of the AAF Procurement Framework The SRA process will apply to all new and renewed material engatements.

Since it was introduced, AAF has not identified any breaches of the Modern Slavery contract clause amongst our suppliers, nor have there been any instances of suppliers refusing to accept or comply with the clause. Furthermore, there is no evidence to suggest that any of AAF's suppliers are engaging in or at risk of engaging in activities involving Modern Slavery.



Oversight and governance practices proportionate to the level of risk assessed in our supply chain have been put in place and continue to evolve and mature. It is intended that supplier management risk assessment management and reporting will be included more formally within internal Risk Control Self-Assessment (RCSA) processes during the course of FY25 and will be the subject of formal reporting into the appropriate internal Board Audit & Risk Sub-Committee or relevant management committee or forum.

Giving consideration to the factors outlined above, AAF considers the risk of Modern Slavery existing within the supply chain as low, however acknowledge that further work is required to properly assess the risks associated with each supplier to ensure they can be appropriately managed and addressed where required.

COMMITMENT TO CONTINIOUS IMPROVEMENT / NEXT STEPS

AAF recognises that significant work to date has gone into the development and advancement of its risk management processes and the related control environment. AAF is committed to continuously evolving and improving in all aspects of its operations, with considerable focus given to risk management and governance at all levels of the organisation.

AAF is committed to maturing its risk management processes. This includes continued understanding and mitigation of the Modern Slavery risks that apply to AAF, particularly in relation to our supply chain.

AAF will continue to work closely with its staff, partners and suppliers to promote a zero-tolerance approach to unfair, unjust and inhumane employment practices. AAF will closely monitor emerging risks to ensure it remains vigilant in its commitment being a responsible business that operates in a way which demonstrates the utmost respect for human rights.

This Statement has been developed in consultation with key stakeholders across AAF, including the Executive Team. This Statement has been endorsed by the Enterprise Risk Management Committee and the Board Audit & Risk Committee and approved by the Angle Auto Finance Board of Directors.

Signed:

Aaron Baxter Chief Executive Officer

09/12/2024 Date: