

Modern Slavery Statement 2025

This Statement is published in accordance with the Modern Slavery Act 2018 (Cth) (**Act**) and outlines the steps Inchcape Australia Limited and its group companies has taken to assess and address the risk of modern slavery in our business and supply chains during the financial year ending 31 December 2025. This is our fifth Modern Slavery statement under the Act.

A. The reporting entities

As with our previous Modern Slavery statements, this is a single joint Statement and covers the following group entities:

- Inchcape Australia Limited (**IAL**);
- Subaru (Aust) Pty Ltd (**Subaru Australia**);
- Inchcape European Automotive Pty Ltd (**Peugeot Citroen Australia**);
- Trivett Automotive Retail Pty Ltd (**Trivett**);
- AutoNexus Pty Ltd (**ANX**);
- Partslane Pty Ltd (**PartsLane**);
- Inchcape Automotive Australia Pty Ltd (**Deepal**);
- Inchcape Automotive Distribution Australia Pty Ltd (Foton LCV & Foton Trucks, collectively **Foton**).

(collectively, **Inchcape Australia**)

B. Structure, operations and supply chains

Our structure, operations, and supply chains have not materially changed in the last few years, other than the addition of Deepal and Foton in 2024. IAL is ultimately owned by Inchcape plc, a company domiciled in the United Kingdom and listed on the London Stock Exchange. IAL is the Australian parent of the Inchcape Australia group companies Subaru Australia, Peugeot Citroen Australia, Trivett, ANX, PartsLane, Deepal and Foton.

Inchcape plc (Inchcape Australia's parent company) publishes an annual Modern Slavery Act (UK) statement, approved by the Inchcape plc Board, and reports under recognised sustainability frameworks, which we align to where relevant in Australia.

Inchcape Australia is a leading player in the automotive services sector operating in the distribution, retail and logistics markets.

The Inchcape Australia group operates the following businesses, with the following supply chain requirements:



Main operations	Supply chain requirements
IAL supports five businesses through 7 shared services functions, being: • Finance • Human Resources	IAL mainly purchases goods and services in the following categories: Facilities management - security, cleaning, office supplies, postage and couriers, waste management, catering, fire protection and furniture.

• Information Systems • Legal & Company Secretariat • Procurement • Marketing & PR • Property	Finance, company secretarial & legal services - insurance, professional company secretarial, legal and financial support. Human Resources - recruitment, training, employee and payroll services Information Technology - hardware, software, telecommunications and network services. Marketing and PR - advertising, media, creative services, print, public relations and marketing services. Operations - call centres, freight, health and safety, workshop parts and consumables, warehousing and logistics. Property - rent, signage, access goods and services, utilities, local authority payments and building services. Travel and Events - travel management, local & international transport, accommodation, parking, employee and customer events.
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Confidence in Motion

Main operations	Supply chain requirements
Subaru Australia is the exclusive Australian importer and distributor of new vehicles manufactured by Subaru Corporation of Japan.	Subaru Australia mainly purchase vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies.



Main operations	Supply chain requirements
Peugeot Citroen Australia is the exclusive Australian importer and distributor of new Peugeot & is the parts distributor for Citroen vehicles manufactured by Groupe PSA of France.	Peugeot Citroen Australia mainly acquires vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies.



Main operations	Supply chain requirements
Trivett operates an automotive retail business selling, servicing and financing new and used vehicles, with dealerships located in New South	Trivett mainly acquires the following goods and services:

Wales, Victoria and Queensland. Some used motor vehicle dealerships are operated under the brand name 'Bravoauto'.	Operations - vehicle cleaning, service, maintenance and repairs, vehicle logistics, workshop parts, consumables and customers gifts Facilities Management - cleaning Marketing and PR - creative services, digital advertising and hosting services, local print and radio media Vehicles and Vehicle Parts – new vehicles from its OEM or Distributor partners, including Subaru, Peugeot Citroen Australia, Mitsubishi Australia, Isuzu Ute Australia, Volkswagen Group Australia, FCA Australia and Kia Australia parts, MRO & workshop consumables. Used Vehicles – used vehicles are acquired from the owners of used motor vehicles.
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Main operations	Supply chain requirements
ANX is a leading national operator in the automotive services industry providing fleet conversions, fleet refurbishment and maintenance, vehicle logistics, parts & vehicle warehousing and distribution, and inventory management services.	ANX mainly acquires goods and services in the following areas: Finance and Legal - insurance Human Resources - temporary and contingent labour Operations - freight, distribution and packaging materials, MRO consumables and services. Property - property management rent and utilities.



Main operations	Supply chain requirements
PartsLane operates an Automotive Genuine Parts E-commerce platform in Australia, including warehousing and distribution, and inventory management services.	PartsLane mainly acquires goods and services in the following areas: Finance and Legal - insurance Human Resources - temporary and contingent labour Operations - freight, distribution and packaging materials, MRO consumables and services. Property - property management rent and utilities.



Main operations	Supply chain requirements
Deepal is the exclusive Australian importer and distributor of new Deepal vehicles manufactured by Mobitech Co Ltd of China.	Deepal mainly acquires vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies.



Main operations	Supply chain requirements
Foton is the exclusive Australian importer and distributor of new Foton vehicles manufactured by Beiqi Foton Motor Co Ltd of China.	Foton mainly acquires vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies.

C. The risks of modern slavery practices in Inchcape's operations and supply chains

In the 2025 reporting period, Inchcape Australia continued to engage the suppliers to understand the inherent modern slavery risks in its operations and supply chains, by categorising the potential risks according to commodity group and evaluated its engagement with suppliers.

Every business entity within Inchcape Australia operates to a centralised governance framework. For all business entities located in Australia, Inchcape Australia is required to comply with all Australian industrial relations laws.

Inchcape Australia continued with its own risk analysis report as a key instrument for understanding the inherent risks within the business operations. The analysis concluded that the risk of modern slavery can be higher within operations where there may be larger and more complex supply chains which extend outside of Australian borders or operation processes that are outsourced through suppliers, yielding less visibility. Although most of Inchcape Australia's direct suppliers within Operations are Australian businesses, Inchcape Australia is aware that suppliers which the business procures for the ancillary services involving low skilled, low-wage services such as Cleaning, Labour Recruitment, Waste management and Security need closer monitoring. The report assessed that the ability to effect significant change is more attainable with suppliers in which Inchcape Australia directly purchases goods and services from.

As illustrated in Figure 1 below, the 2025 report identified the majority of Inchcape Australia's spend (Level 1 Commodities) and found that most Level 1 commodities pose low to moderate risk. This is primarily because 79% of the supply chain spend originates from Japan, where the production and labour occur, which the geographic risk of modern slavery is low (as per the Global Slavery Index).

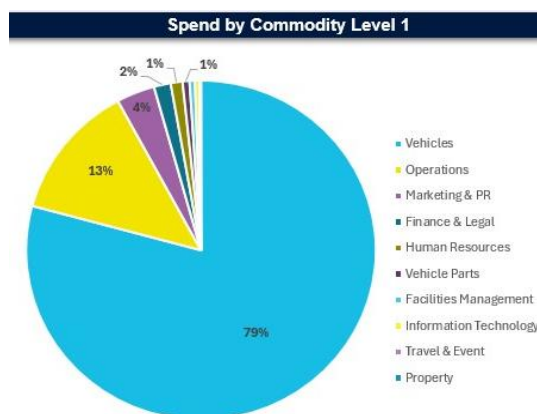


Figure 1 Spend by Commodity – Inchcape Australia

Risks identified in the report were reviewed against the Global Slavery Index, which provides country and industry rankings developed by the Walk Free Foundation, the International Labour Organisation (ILO), and the International Organisation for Migration. Even with the inclusion of Deepal and Foton which are manufactured in China, where perception of geographic modern slavery risk may be high, the actual index sits in the low section of the index. Hence, there is no real impact to the overall risk with the inclusion of the 2 new OEMs. The Risks related to the Global Slavery Index are assessed based on four standards:

- Social, Health and Economic Rights;
- Civil and Political Protections;
- Personal Security; and
- Refugees and Conflict.

In addition, risks identified in the report were tracked against The Dow Jones Sustainability Index:

- Industry Specific Criteria;
- Human Capital Development;
- Labour Practice Indicators;
- Corporate Citizenship; and
- Social Reporting.

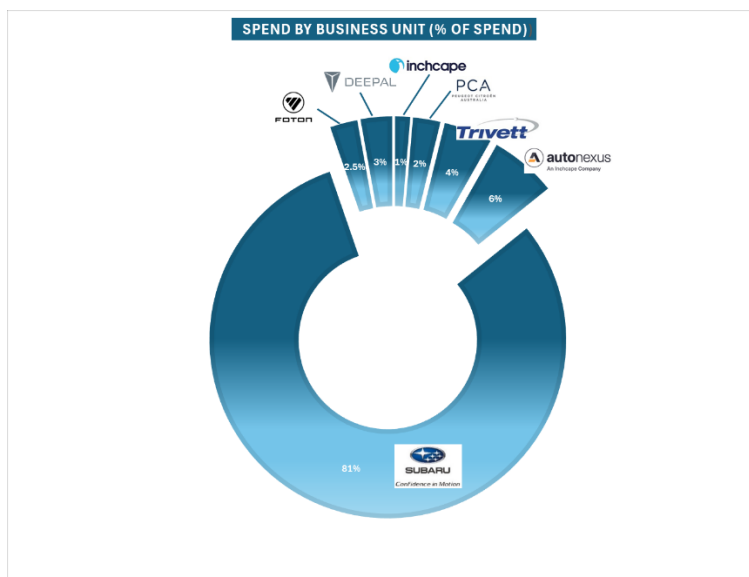


Figure 2 Spend by Business Unit (AUD)

As shown in Figure 2 above, Subaru Australia represents **81%** of the total spend across all business units. In Figure 3 below, within Subaru Australia, **90%** of its total expenditure is allocated to the purchase of new Subaru vehicles from the manufacturer. Furthermore, 79% of the total spend originates from the Level 1 Commodities in the “Vehicles” category (refer to Figure 1).

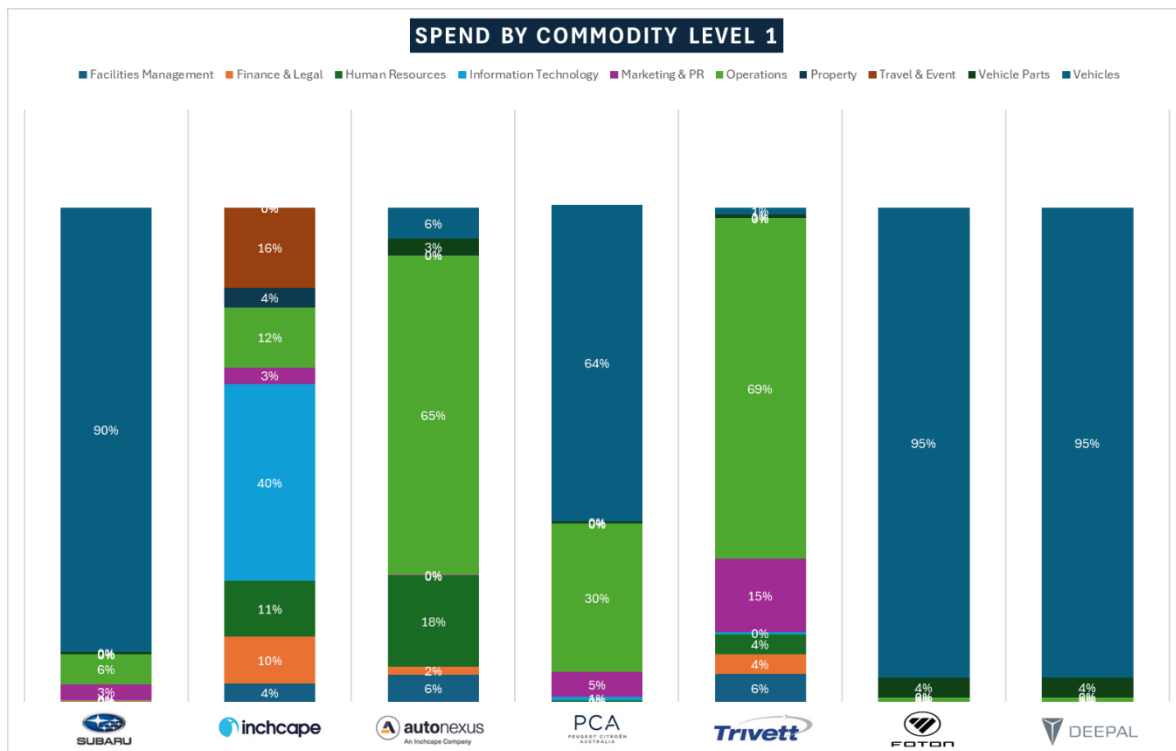


Figure 3 Spend by Commodity Level 1 - Business Unit

Overall, in 2025 Inchcape Australia's view remained that the inherent risk of modern slavery in its operations and supply chain is low as most of the goods and services Inchcape Australia purchases continue to be from countries where the prevalence of modern slavery is considered to be quite low. As previously reported, products purchased from higher risk countries only account for approximately 1% of the products Inchcape Australia acquires.

Even with the inclusion of Foton and Deepal, the inherent risk does not change as though their country of origin is perceived to be a risk, publicly available information from the Walk Free foundation indicates that the country of origin's actual rating is low.

D. Actions taken to assess and address modern slavery risk

During 2025, as part of onboarding new distribution relationships, we embedded supply-chain due diligence expectations in our Deepal and Foton Distribution Agreements. These agreements require compliance with Australian laws (including wages, hours and conditions of employment, anti-discrimination and occupational health and safety), include robust anti-bribery and sanctions obligations, preserve records retention and inspection/audit rights, require regular operational reporting, and place governance requirements on downstream dealer and after-sales service networks (including capability standards and training). We rely on these contractual controls, alongside our Supplier Code of Conduct and due diligence platform, to assess, monitor and, where necessary, remediate modern slavery risks in these supply chains.

During FY2025, we aligned our Australian supplier due diligence with Inchcape plc's global framework, including the Group's Supplier Code of Conduct, Code of Conduct, Global Procurement Policy and Risk Management Framework, which require suppliers to comply with applicable laws on modern slavery and human trafficking and embed proportionate, risk-based due diligence. We leveraged the Group's central procurement system and mandatory supplier sustainability questionnaires to improve transparency and oversight during onboarding and renewal. Targeted

training (including modern slavery red flags) was delivered to relevant procurement and finance colleagues in line with Group programmes. We also considered OEM and key supplier modern slavery statements and continued to use Group whistleblowing mechanisms (EthicsPoint) to enable confidential reporting.

The Policies and Procedures that have been implemented by Inchcape Australia to Address, Assess and Mitigate Modern Slavery Risk throughout 2025 are outlined below:

Policy or Procedure	Purpose
1. Conducting Due Diligence of our Suppliers through online due diligence software platform	During 2025, Inchcape is continuing with embedding the compliance management platform. Weekly reports are produced to provide an insight into compliance tracking and to enable the evaluation of information provided by the suppliers. This will enable both the monitoring of challenges that the suppliers may face during the completion of compliance and also the performance of the platform.
2. Conducting Modern Slavery Training	Inchcape Australia implemented mandatory Modern Slavery Training to nominated staff involved in procurement of goods or services to ensure they are able to identify and manage the modern slavery risks. The training module is designed to raise awareness of what a modern slavery is, who the victims are, why it is relevant to the business, what the business is doing to address it, and what staff can do to manage the risks. The training included relevant case studies to give context to different forms of modern slavery and how they might occur in the workplace and supply chain. The training is also designed to address particular business operations where Inchcape Australia considers the most perceived risks lie.
3. Supplier Code of Conduct	Inchcape Australia has conducted a comprehensive review of its Code of Conduct for Suppliers policy to ensure it aligns with the elevated expectations and the higher global awareness of modern slavery issues. Inchcape Australia's Code of Conduct policy is guided by international standards and guidelines. It has six key expectations that Inchcape Australia's suppliers acknowledge: • Human Rights and Labour Standard: Suppliers acknowledge that they ensure and protect against practices of modern slavery in the form of forced labour and that necessary steps have been taken to identify risk of modern slavery. • Business integrity: Requirement for all suppliers to comply with applicable laws in the market which they operate.

	• Freedom of Assembly: Suppliers are to acknowledge workers have the freedom to choose employment, and to respect the laws regarding freedom to form interest groups. • Whistle-blower Policy: Process and protections afforded to suppliers or any employees of Inchcape Australia, to raise concerns that they may have about suspected wrongdoing within the organisation. • Safety in Working Environment: Suppliers should seek to avert dangers to employees by means of preventative occupational safety measures. • Environmental Protection: Suppliers comply with applicable environmental standards and commit to principles of sustainable management as part of their corporate value.
4. New Supplier On-boarding Policy	For new suppliers to Inchcape Australia, there is a supplier onboarding process where all suppliers are required to acknowledge the Inchcape Code of Conduct for Suppliers prior to any purchase orders being created through the digital ERP platform. Completing a signed form is mandatory, confirm all supplier information provided is true and correct and that you have read and agree to abide by • Code of Conduct for Suppliers • UK Bribery Act • Modern Slavery Act In particular, a declaration is also required from buyers who are onboarding new suppliers to understand the obligations as an employee when working with suppliers to engage in an anti-bribery zero tolerance approach, declare any conflicts of interest, and apply fair competition and anti-trust rules.
5. Contract Clauses	In order to further mitigate risks with suppliers that are engaged by Inchcape Australia within the supply chain, a standard Modern Slavery contract clause is required in standard contract templates where the spend is over \$50k per annum. This is managed and overseen by the procurement team.
6. Whistle-Blower Policy	For situations where an anonymous report is preferred, employees are encouraged to use the confidential Whistleblowing Hotline hosted by a third-party hotline provider. Employees are encouraged to submit reports relating to violations stated in the Supplier Code of Conduct.

E. Assessing the effectiveness of Inchcape's actions

Inchcape Australia continued its journey on modern slavery due diligence during the 2025 reporting period and will continue to review and assess the effectiveness of actions taken to address modern slavery, to determine whether they are effective or require further refinement or improvement.

In assessing effectiveness, we also monitor the operation of the contractual controls embedded in our Deepal and Foton Distribution Agreements described in Section D, including regular partner reporting, the exercise (where appropriate) of inspection and audit rights, governance over downstream dealer and after-sales networks, and compliance with sanctions and anti-bribery requirements; these mechanisms enhance transparency, enable escalation and remediation, and complement our Supplier Code and due diligence platform.

The following steps were undertaken in assessing the effectiveness of our actions in the 2025 reporting period:

Action	Assessment of Effectiveness
1. Conducting Due Diligence of our Suppliers through Online due diligence software platform	With the implementation of an online third-party due diligence platform, Inchcape Australia is able to aggregate data submitted by suppliers to determine the level of Modern Slavery risk in relation to that supplier. This allows those risks to be identified, managed, and actioned by suppliers. Questionnaire criteria include mandatory fields as following: • Whether the business at the time of providing the data is required to produce a Modern Slavery Statement (Suppliers with annual consolidated revenue of at least \$100 million). • Or if they voluntarily produce the report without meeting the reporting threshold. • If not yet produced but required to under the reporting threshold, the expected date of development. • Copy of Modern Slavery Statement to be uploaded. • As summary, suppliers are to tick all fields that apply to them based on what is included in the company statement. If more fields are applied, their overall score will improve. • Corporate policies, management procedures or codes of conduct that have been developed and implemented to address the potential risk of modern slavery within their supply chain. • Copies of supporting evidence to be uploaded. With above mechanism in place Inchcape Australia is able to track the level of engaged suppliers who have completed

	the questionnaire, which is still ongoing to achieve improved completion rate.
2. Conducting Modern Slavery Training	Inchcape Australia has a Modern Slavery training module delivered through a third-party training provider. The training module assesses whether staff can correctly identify indicators of potential victims and how to mitigate the risk of modern slavery in various context the staff may come cross. The module includes a test section assessing the understanding level of modern slavery risk (low / high) based on different scenario of goods and services procured. The business implements a mandatory pass rate of 80%. The training module is rolled out on an ad hoc basis to identified audiences when required.
3. Supplier Code of Conduct	The Inchcape Code of Conduct for Suppliers has been shared with suppliers with an open line of communication between Inchcape and the supplier to discuss the approach.
4. New Supplier On-boarding Policy	An established process took place to review the actions Inchcape Australia has taken in the 2024 reporting period, including mandatory compliance fields new suppliers must complete before proceeding to the next step of the onboarding process can be triggered by the nominated Supplier Master Data team.
5. Contract Clauses	Inchcape Australia during the reporting period of 2024, continued to prioritise due diligence in inherently higher risk ancillary service categories, including cleaning, contingent labour services and third-party services. All new contracts signed require 100% compliance.
6. Whistle-Blower Policy	Through Inchcape Australia's Whistleblowing policy, no complaints were received regarding any potential modern slavery incidents.

F. Consultation with Inchcape's entities

Inchcape Australia has a Modern Slavery Project Team that works across all business units and functional departments. The Modern Slavery Project Team consults with key staff members of each business unit as required and regularly meets to provide updates.

G. Other information

Inchcape Australia has no additional or other information to provide in respect of the reporting period of 2025.

Approval

This Modern Slavery Statement was approved by the Board on 25 June 2026.

A handwritten signature in black ink, appearing to read 'BR', with a horizontal line underneath.

Blair Read
Managing Director
Inchcape Australia Limited