



Modern Slavery Statement

Drake Trailers Pty Ltd

Introduction

This statement was approved by the board of Drake Trailers Pty Ltd in their capacity as principal governing body of Drake Trailers on 6th November 2025.

This statement, pursuant to the Modern Slavery Act 2018 (Cth) (**Act**), sets out the actions taken by Drake Trailers to address Modern Slavery risks in our business and supply chain for the financial year ending 30 June 2025. This is Drake Trailer's first statement under the Act.

We are committed to continuous improvement in our processes to effectively identify and prevent the risk, and remediate any circumstance, of Modern Slavery in our business or supply chain by;

- Engaging with industry and external experts to stay informed about best practice.
- Reviewing and updating our policy regularly to ensure it remains current and effective.
- Working collaboratively with stakeholders to address and mitigate risks of modern slavery.

Reporting Entity

This statement applies to Drake Trailers Pty Ltd (ABN: 91 009 761 031) and all of its associated business names.

Structure, Operations and Supply Chains

Drake Trailers Pty Ltd is a large privately owned Australian company with over 350 employees. Drake Trailers is structured as a company incorporated in Australia, and has its headquarters in Wacol, Queensland. The company operates through its core brands; Drake, Drake Trailers, O'Phee Trailers, Drake Collectibles and Dalzell & Bagley Engineering.





Drake's main operations include the manufacturing of semi-trailers and low loaders as well as associated engineering components, through direct employment of workers across its four sites across Australia.

Our operations in Australia include;

- Manufacturing facilities in both Wacol and Archerfield, Queensland
- Two Service and Repair centres located in Welshpool, Western Australia and Richlands, Queensland
- A supply chain consisting of approximately 300 suppliers across Australia, New Zealand, Europe and Asia

The Risks of Modern Slavery Practices in the Operations and Supply Chains of Drake Trailers

We undertook risk assessments of modern slavery risks in our operations and supply chains over the reporting period to consider the risk that we are causing, contributing, or directly linked to modern slavery practices. Drake considers that the risk of directly or indirectly contributing to the following practices:

- Slavery
- Servitude
- Unlawful child labour
- Forced labour
- Human trafficking
- Debt bondage
- Slavery like practices or
- Deceptive recruiting for labour or services

(individually or collectively **Modern Slavery**), in its own operations, is low because:

- i. Drake Trailers workers are engaged in direct employment relationships, subject to relevant awards or industrial instruments, and at all times, subject to National Employment Standards under the *Fair Work Act 2009* (Cth);





- ii. Our employees have free choice of employment; the use of forced, bonded or involuntary labour does not occur;
- iii. Drake complies with the national minimum age of employment;
- iv. Our employees are not permitted or encouraged to incur debt through recruitment fees, fines or other debts to their employing entity;
- v. Employees are not required to lodge deposits or identity papers with Drake and are free to seek other employment at any time;
- vi. Employees are free to leave their place of employment after their shift;
- vii. Wages or benefits for a standard working week meet or exceed all legal requirements;
- viii. Deductions from wages as a disciplinary measure do not occur, and any deductions which are not permitted by law do not occur unless the employee has consented;
- ix. Employees have the right to join or form trade unions or to collectively bargain
- x. Drake adopts an open attitude towards the activities of trade unions, workers representatives and their organisational activities and does not prevent or interfere with legitimate trade union activity.
- xi. Our operations occur in jurisdictions where adherence to law is the norm and transparent and strong labour system exist, subject to sound regulatory oversight.

Engagement with third-party international supplier factories pose as a potential geographical risk due to being in countries that may have poor governance. Additionally, internationally procured raw materials that are used in our product such as rubber from tyres have been identified as a high risk for modern slavery globally. This potential risk for Modern Slavery was identified and is continually monitored via our Modern Slavery Policy.

The Actions and Due Diligence Processes Implemented by Drake to assess and address risks of Modern Slavery Practices

Drake Trailers has established comprehensive policies and systems that actively support ethical practices and ensure compliance with legal standards across all areas of its operations. These policies include our Supplier Code of Conduct as well as Modern Slavery Policy to prevent the potential for modern slavery in our business. These policies are actively communicated and reinforced throughout our workforce and supply chain and used to screen and qualify suppliers. As part of our Modern Slavery Policy, a risk assessment is incorporated





into our supplier selection process to further support ethical sourcing and gather valuable feedback.

How Drake Assesses the Effectiveness of Its Actions and Due Diligence Processes

As this is our first reporting period, our focus was to gain an understanding of modern slavery risks and how such risks may be present in our operations and supply chain. At this early stage, the effectiveness of our actions and due diligence processes will be measured via;

- The establishment of a Modern Slavery awareness training program
- Number of suppliers completing our Modern Slavery Questionnaire
- Reports of any circumstances of Modern Slavery being identified and then appropriately remediated

The Process of Consultation

Drake Trailers' Board receive regular updates on the activities of Anti-Slavery Australia. Senior Management of Drake Trailers are aware of the contents of this statement.

John Drake (Nov 6, 2025 14:47:50 GMT+10)

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Modern Slavery Final Draft

Final Audit Report

2025-11-06

Created:	2025-11-05
By:	Maggie Drake (maggie@thedrakegroup.com.au)
Status:	Signed
Transaction ID:	CBJCHBCAABAAJpxhT8o3svF3idyscHgXEk_VyfjC6ASK

"Modern Slavery Final Draft" History

-  Document created by Maggie Drake (maggie@thedrakegroup.com.au)
2025-11-05 - 10:22:10 PM GMT
-  Document emailed to John Drake (john@thedrakegroup.com.au) for signature
2025-11-05 - 10:22:16 PM GMT
-  Document emailed to Samuel Drake (sam@thedrakegroup.com.au) for signature
2025-11-05 - 10:22:16 PM GMT
-  Email viewed by Samuel Drake (sam@thedrakegroup.com.au)
2025-11-06 - 3:59:38 AM GMT
-  Document e-signed by Samuel Drake (sam@thedrakegroup.com.au)
Signature Date: 2025-11-06 - 4:00:06 AM GMT - Time Source: server
-  Email viewed by John Drake (john@thedrakegroup.com.au)
2025-11-06 - 4:47:09 AM GMT
-  Document e-signed by John Drake (john@thedrakegroup.com.au)
Signature Date: 2025-11-06 - 4:47:50 AM GMT - Time Source: server
-  Agreement completed.
2025-11-06 - 4:47:50 AM GMT