



FY25
Modern Slavery Statement





About RACQ

RACQ is one of Australia's most trusted brands owned by and working for the benefit of our more than 1.7 million members. Our purpose 'to drive a positive future for all Queenslanders' guides our strategy, operations, products, and the way our people show up every day on the road, on the phone and in our stores supporting members with their insurance, roadside, banking and solar energy needs.



Acknowledgement of Country

RACQ acknowledges the Traditional Custodians of the countries throughout Queensland and recognises their continuing connections to the lands, waters, and skies. We pay our respects to all Aboriginal and Torres Strait Islander cultures; and to Elders past and present.

RACQ is proud to operate in a nation that is home to the oldest continuous culture on Earth, dating back more than 65,000 years and continues today.

However, we recognise there is still much work for us to do to achieve meaningful reconciliation. We acknowledge that reconciliation must live in the hearts, minds, and actions of all Australians as we move forward, creating a nation strengthened by respectful relationships. In partnership with Aboriginal and Torres Strait Islander peoples and communities, RACQ has pledged to become part of the solution through our Reconciliation Action Plan.



Our Statement

This is the sixth modern slavery statement for The Royal Automobile Club of Queensland Limited (RACQ). It describes the actions taken by RACQ to assess and address modern slavery risk within our operations and supply chain for the financial year ended 30 June 2025. This statement has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth) (the Act). The RACQ Group Procurement function under the Chief Financial Officer developed this joint statement on behalf of all reporting entities within the RACQ Group as at 30 June 2025.

Reporting Entity

The reporting entity for the purposes of the Act is The Royal Automobile Club of Queensland Limited (RACQ). RACQ is the parent company that owns and controls other entities which together form the RACQ Group.¹

The 2025 RACQ Modern Slavery Statement is a joint statement made on behalf of the following reporting entities:

- The Royal Automobile Club of Queensland Ltd (ABN 72 009 660 575)
- RACQ Operations Pty Ltd (ABN 80 009 663 414)
- Members Banking Group Limited (ABN 83 087 651 054)
- RACQ Insurance Limited (ABN 50 009 704 152)
- Club Insurance Holdings Pty Ltd (ACN 143 864 082)
- RACQ Investments No.2 Pty Ltd (ABN 59 060 316 216)
- Club Finance Holdings Limited (ACN 612 096 787)

¹ RACQ Insurance was part of the RACQ Group as at 30 June 2025 but ceased to be a member of the RACQ Group on 1 September 2025. Refer to page 5.

Our structure and operations

Corporate Structure

RACQ is a public company limited by guarantee, incorporated and domiciled in Australia. RACQ is governed by its constitution, the Corporations Act 2001 (Cth) and common law principles of mutuality. It is also governed by industry specific regulations such as the Insurance Act 1973 and Banking Act 1959, and the various prudential standards regulated by the Australian Prudential Regulation Authority (APRA) for RACQ's specific insurance and banking activities.

RACQ Group's structure and the interest held in each controlled entity is as follows:

| | Interest held | |
|---|---------------|--------|
| | FY25 % | FY24 % |
| RACQ Operations Pty Ltd ² | 100 | 100 |
| RACQ Investments Pty Ltd | 100 | 100 |
| RACQ-Queensland Driving Excellence Centre Pty Ltd | 100 | 100 |
| Automotive Assistance Services Pty Ltd | 100 | 100 |
| RACQ Distribution Services Pty Ltd (formerly, RACQ Financial Planning Pty Ltd) ³ | 100 | 100 |
| Q Garage Pty Ltd | 100 | 100 |
| Basecamp No.2 Pty Ltd (formerly Hug Insurance Pty Ltd) | 100 | 100 |
| Basecamp Innovation Pty Ltd | 100 | 100 |
| RACQ Investments No.2 Pty Ltd ² | 100 | 100 |
| Club Insurance Holdings Pty Ltd ⁴ | 100 | 100 |
| RACQ Insurance Limited ⁵ | 100 | 100 |
| Club Finance Holdings Limited | 100 | 100 |
| Members Banking Group Limited | 100 | 100 |
| Arrow Funding Trust No.1 | 100 | 100 |
| RACQ Foundation Pty Ltd | 100 | 100 |
| RACQ Foundation Fund | 100 | 100 |
| RACQ Foundation Trust | 100 | 100 |

Strategic Evolution

On 28 November 2024, RACQ announced a landmark 25-year strategic partnership with IAG, one of Australia's leading general insurers. Under the new partnership, RACQ retains a 10% equity interest in RACQ Insurance and maintains the role of insurance marketing, sales and service. The transaction was completed on 1 September 2025.

² Subsidiaries are parties to a Deed of Cross Guarantee.

³ During the year, this entity was transferred from Members Banking Group Limited to RACQ Operations Pty Ltd in accordance with a Sale and Purchase Agreement.

⁴ 50% of the shares in Club Insurance Holdings Pty Ltd are held by RACQ Investments Pty Ltd, and 50% of the shares in Club Insurance Holdings Pty Ltd are held by RACQ Investments No.2 Pty Ltd.

⁵ 90% of the ordinary shares held in RACQ Insurance Limited were sold on 1 September 2025

RACQ Owned Entities

In addition to RACQ controlled entities, RACQ has equity interests in a range of other strategic investments. These entities are not wholly owned or controlled by RACQ or its controlled entities. These entities are involved in the distribution of batteries, solar energy, EV charging, travel insurance and other general insurances. Further information is available in RACQ's FY25 Annual Report [here](#).

Business Operations

RACQ's principal activities during the year included the provision of roadside assistance, motoring services, general insurance, banking, travel and solar products.



RACQ Bank

Accounts (transaction, savings, term deposits)
Loans (home loans, car loans, personal loans, boat loans, debt consolidation loans)



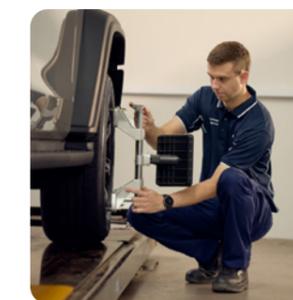
RACQ Insurance

Car, Home and Contents, Boat, Pet, Caravan and Trailer Insurance



RACQ Assistance

24/7 Roadside Assistance for e-scooters, e-bikes, mobility scooters, wheelchairs, cars, vans, RVs including electric vehicles



RACQ Auto

Car batteries
Glass services
Vehicle inspections
Logbook services
Minor mechanical
ADAS recalibrations

FY25 Highlights

193,521
total insurance claims lodged⁶

\$1.4b
total net assets

7,874
community volunteer hours
through RACQ initiatives¹⁰

736,924
Roadside Assistance jobs⁷

\$1.8b
total revenue

58,713
participants in RACQ road
safety education programs¹¹

\$700m
RACQ Bank loans funded

2,736
employees

132
public EV charging sites supported by
RACQ sponsorships and investments¹²

\$48.0m
net surplus after tax⁸

\$6.4m
provided to charities and
communities across the State⁹

774
residential solar systems and battery
systems installed through RACQ Solar



⁶ General Insurance excluding CTP and travel insurance.

⁷ Total Roadside Events (includes roadside, towing, member and community, business/commercial events).

⁸ Statutory net surplus after tax including \$68.2m income tax expense for the RACQ Insurance transaction.

⁹ Includes community sponsorships, donations, investments in RACQ owned regional EV charging assets, RACQ education programs, RACQ Foundation grants and assistance projects and volunteering by RACQ employees. Does not include commercial sponsorships or RACQ enabled employee and member fundraising activities.

¹⁰ Includes RACQ employees, Friends of the Foundation and trade volunteers.

¹¹ Includes road safety education programs delivered in-person or virtually.

¹² Includes RACQ sponsored Queensland Electric Super Highway, RACQ owned EV charging stations, and co-branded EV charging stations located in QLD and Northern NSW owned and operated by Evie Network.

Our sustainability framework

RACQ's 'A Force for Good' framework is made up of four key pillars that capture the Club's sustainability activities, including areas of focus, outcomes, metrics, and our alignment to the United Nations Sustainable Development Goals (SDGs). The progress made against these pillars is reported annually in our Annual Report.



Our focus areas

People

Thrivin together

Focus Areas:

- Improving member satisfaction, experience and benefits
- Building on our diverse and inclusive culture

Community

Safe at home and on the road

Focus Areas:

- Advocating for safe driving and safer, connected roads
- Supporting climate-resilient communities

Environment

Trading lightly on the earth

Focus Areas:

- Supporting Queensland's transition to a low-carbon future
- Working towards net-zero¹³ and circular operations

Governance

Trusted by Queensland

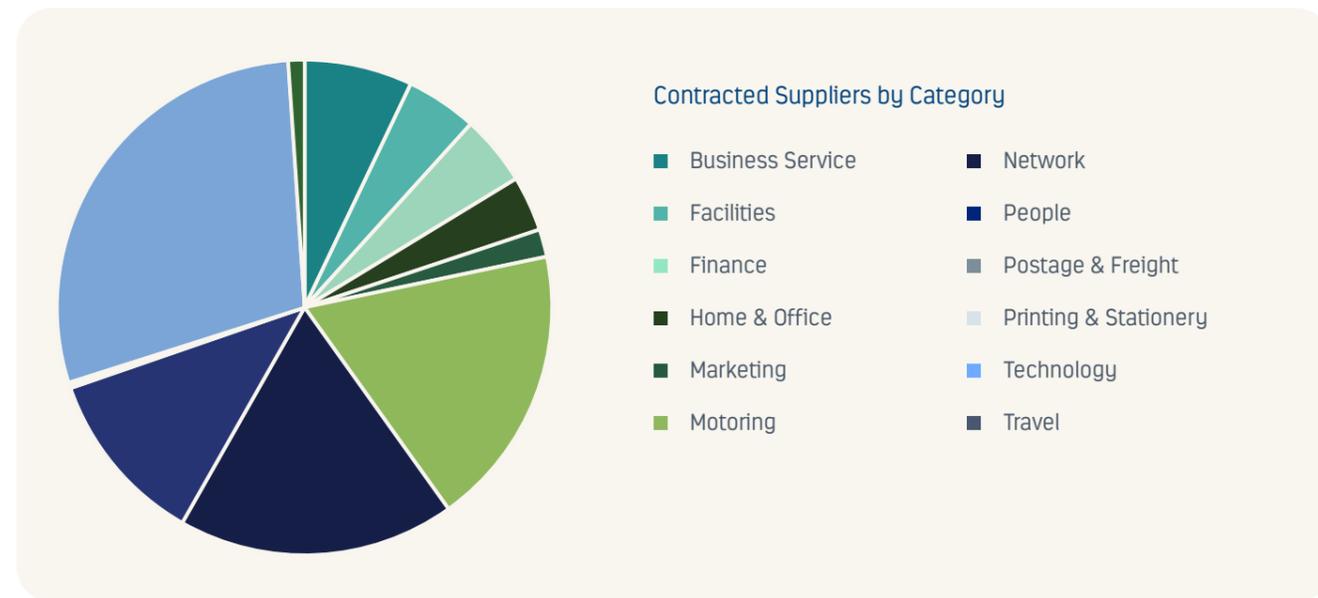
Focus Areas:

- Renewing and innovating our business model
- Leading with integrity and transparency

¹³ Our definition of net-zero is based on the Insurance Council of Australia Climate Change Roadmap, that net-zero is a state in which Green House Gas (GHG) emissions have been lowered at least 90% versus a baseline year, with remaining emissions neutralised via nature-based or technological carbon removals.

Our Suppliers

As at February 2025, we had supplier contracts for the provision of goods and services within the following categories:



Our analysis is based on data recorded in RACQ's central contract management system. It does not include low-risk, low-value suppliers who are engaged without formal contracts.

| Category | Sub-Category | |
|-----------------------|---|---|
| Motoring | Approved Repairers* Driver Training Vehicle Inspections Windscreen repairers Fleet Services New Vehicles Salvage/Auction Smash Repairs | Vehicle Recovery Battery Supply Fuel Supply Patrols/Traffic Response Unit Interstate Vehicle Assessing Tow-Trucks Caravan Repairs Paintless Dent Removal |
| | Recruitment Training/Wellbeing | Contractor/Consultant Uniforms |
| | Financial Accounting Tax Investment Management Banking | Actuary Corporate Insurance Reinsurance |
| Travel | Corporate | Leisure |
| Technology | Services IT Software | IT Hardware Telecommunications |
| | Legal Services Partnership** Loss Adjusting Services Intercompany Agreements Debt Collection Services | Audit Foundation Investigation Services Sponsorship |
| Home & office | Building Services Electronics/Electronic Jewellery | Managed Services Flat Glass Restoration |
| Postage & Freight | Postage | |
| Network | Contracted Service Providers | Agents/Brokers |
| Facilities | Occupancy Construction Maintenance Services | Utilities Cleaning/Waste Management Security |
| | Media/Advertising Merchandise | Design/Artwork |
| Printing & stationary | Stationary | Print Products |

*Approved repairers refers to Roadside Assistance mechanical repairs and insurance repairs. Note insurance repairers ceased to be a supplier category for RACQ following the sale of 90% of the ordinary shares in RACQ Insurance on 1 September 2025.

**Partnership refers to suppliers engaged to support strategic investments.

Procurement at RACQ

Group Procurement is part of RACQ's Group Corporate Services function and provides assistance and advice for sourcing and purchasing, supplier onboarding, outsourcing, governance and category management for the RACQ Group. RACQ has a Group Procurement and Supplier Management Procedure which supports these activities, which applies to all the reporting entities in the Group. Our coordinated shared services model for Group-wide functions means 82% of supplier contracts were managed by RACQ Operations Pty Ltd as at February 2025.

Our commitments

We are driven by a commitment to create a positive future for all Queenslanders. Our suppliers are essential partners in achieving this vision. We recognise and value the contribution our suppliers make to our organisation, and we aim to hold ourselves and our partners to high standards of ethical conduct.

RACQ recognises that modern slavery can take many forms, including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

RACQ acknowledges that no sector or industry is immune from the risks of modern slavery. We're committed to taking the necessary steps to identify and address modern slavery in our operations and supply chain, and to continuously improve our understanding of, and response to, modern slavery risks.

Identify Assess Address

Identifying the Risk of Modern Slavery in our Operations and Supply Chain

Although Australia is among the least vulnerable countries to modern slavery in the Asia Pacific region¹⁴, we acknowledge there remains a risk of modern slavery in our operations, particularly in high-risk areas including the use of labour hire contractors for cleaning, security and facilities management.¹⁵

Sector risks:

High-risk industries for the financial sector in Australia include financial products and services (for example, investing and lending), cleaning, maintenance and security, asset and tenant management, construction, sub-contracting labour hire, textiles and IT hardware.¹⁶

Imported risks:

Our imported products also present a high risk for modern slavery. In our extended supply chain, high-risk areas include electronics, garments, solar panels and textiles.¹⁷

Investments:

Investments (direct or managed) carry potential modern slavery risks, based on the investee business sector, geographical location, workforce and business structure.¹⁸

¹⁴ Walk Free, Global Slavery Index, Modern Slavery in Australia: [Modern slavery in Australia | Walk Free](#)

¹⁵ KPMG, Modern Slavery - [Are you ready to take the next steps in modern slavery due diligence \(2025\)](#), page 7

¹⁶ KPMG, Modern Slavery - [Are you ready to take the next steps in modern slavery due diligence \(2025\)](#), page 7

¹⁷ Four of the five most valuable products imported by Australia at risk of being produced under conditions of modern slavery:

Walk Free, Global Slavery Index, Modern Slavery in Australia: [Modern slavery in Australia | Walk Free](#)

¹⁸ [KPMG, Financial services and modern slavery \(2021\)](#), Page 10

We have identified the following risk factors in our operations and supply chain:

| Risk Factor ¹⁹ | Category | Sub-Category |
|---|------------------|--|
| Use of short-term contracts, temporary labour and outsourcing in industries with a high risk of labour exploitation | Technology | IT Software |
| | Facilities | Construction, Cleaning, Waste Management |
| | Home & Office | Building Services |
| | Motoring | Approved Repairers |
| Product or components of the product are made in countries or from materials or using services with a high risk of labour exploitation as reported by international organisations or non-governmental organisations | Business Service | Partnership |
| | Technology | IT Software, IT Hardware |
| | Home & Office | Building Services |
| | People | Contractors, Uniforms |
| | Motoring | Windscreen, Battery Supply |
| | Finance | Investment Management |
| Use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at nighttime or remotely | Facilities | Construction, Cleaning, Waste Management |
| | Home & Office | Building Services |
| | Motoring | Approved Repairers |

Location of our contracted suppliers

The majority (approx. 90%) of our contracted suppliers are Australian-based. Our international suppliers were located in the following countries:

| Country | Number of suppliers | Prevalence of Modern Slavery ²⁰ |
|----------------|---------------------|--|
| Austria | 2 | 1.9 per 1000 people |
| Bermuda | 1 | Not available |
| Canada | 2 | 1.8 per 1000 people |
| Czech Republic | 1 | 4.2 per 1000 people |
| Estonia | 1 | 4.1 per 1000 people |
| France | 2 | 2.1 per 1000 people |
| Germany | 3 | 0.6 per 1000 people |
| India | 1 | 8 per 1000 people |
| Ireland | 4 | 11 per 1000 people |
| Japan | 1 | 11 per 1000 people |
| New Zealand | 4 | 1.6 per 1000 people |
| Singapore | 1 | 2.1 per 1000 people |
| Slovakia | 1 | 7.7 per 1000 people |
| Switzerland | 1 | 0.5 per 1000 people |
| United Kingdom | 6 | 1.8 per 1000 people |
| USA | 34 | 3.3 per 1000 people |
| Total | 65 | |

Low  High

RACQ acknowledges that we have arrangements with a minority of suppliers in geographic locations with a higher risk of modern slavery.²¹ This is reflected in our assessment of modern slavery risks, detailed below.

Assessing the Risk of Modern Slavery in our Operations and Supply Chain

Our Investments

RACQ's external investment managers are signatories to the United Nations-backed Principles for Responsible Investment (PRI). Both our provider and its custodian have published modern slavery statements. The FY25 portfolio consisted of internally and externally managed investments with over 95% of those investments allocated to Australian fixed interest and money market securities, including cash. Other investment asset classes were infrastructure, direct property and alternative investments.

Our operations and supply chain

RACQ has assessed modern slavery risks present in our operations and supply chain:

- through our own assessments, led by our Group Procurement team in consultation with contract owners and managers, and our Modern Slavery Working Group
- by engaging a third-party provider specialising in modern slavery risk assessments to conduct an annual review of our contracted suppliers. Suppliers without a contract (those assessed as low-risk and low-value) were not included in this review
- focussing on our contracted suppliers in industries and countries with inherent high modern slavery risks.

Our third-party provider reviewed 701 contracted suppliers [FY24: 800 suppliers].

Our third-party provider assigned each supplier a risk rating based on the theoretical number of forced labourers per million dollars of estimated procurement spend. The inherent risk rating was derived from a combination of:

- Country and industry-specific data
- Global supply chain mapping (up to Tier 10)
- Modern slavery prevalence estimates (sourced from research and reports including those prepared by Walk Free Foundation, International Labour Organisation, and United States reports on International Child Labour, Forced Labour and Human Trafficking).

The following risk-ratings were used:

| Risk Level | What it Means | Examples |
|---|---|---|
|  Low | Very unlikely to involve forced labour. | Recreational, cultural and sporting services; Construction in Australia |
|  Moderate Low | Slightly more risk, but still relatively safe. | Stationary, petroleum, tarpaulins in Australia |
|  Moderate | Noticeable risk—at least 3x greater than Low. | Technology in India; Uniforms in Australia |
|  Moderate High | High risk—about 4x greater than Moderate. | Rice in India, Hotels in China |
|  High | Very high risk—at least 45x greater than Low and at least 4x greater than Moderate. | Sugar in Guatemala, Mining in Congo |

¹⁹ Attorney-General's Department, Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (May 2023) Pages 81-83:

²⁰ Walk Free Global Slavery Index: [World | The Global Slavery Index](#)

²¹ [Walk Free, Global Slavery Index \(2023\)](#) pages 146-147

The inherent risk of modern slavery across our contracted suppliers was assessed as follows:

| Inherent Risk of Modern Slavery | |
|---------------------------------|------------|
| Risk | Suppliers |
| ● Low | 676 |
| ● Moderate Low | 23 |
| ● Moderate | 2 |
| Grand Total | 701 |

Based on the assessment of inherent risk, our provider recommended a list of suppliers to receive a modern slavery questionnaire to obtain further information for assessment. Those selected to receive a questionnaire either received an inherent risk rating of moderate-low or higher, or have been classified by RACQ as significant or niche according to our procurement segmentations:



141 suppliers were sent questionnaires to complete. The questionnaire asked a range of questions about suppliers' policies, processes and practices (including staff training) to prevent, detect and report modern slavery in their operations and supply chains.

Forty-two percent (42%) of surveyed suppliers completed the survey (FY24: 48%). Suppliers with an inherent rating of moderate-low or above who did not complete the questionnaire were followed-up and also subject to further due diligence to identify any secondary sources to mitigate modern slavery risks (for example, a published Modern Slavery Statement). This due diligence resulted in one supplier's risk rating being revised from moderate to moderate-low, and one supplier revised from moderate-low to low.

The level of risk remaining after the assessment of risk via the Third-Party modern slavery questionnaire and/or revision of secondary sources (the residual risk) has been assessed as follows:

| Residual Risk of Modern Slavery | |
|---------------------------------|------------|
| Risk | Suppliers |
| ● Low | 677 |
| ● Moderate Low | 23 |
| ● Moderate | 1 |
| Grand Total | 701 |

The residual risk rating according to purchase category is assessed as follows:

| Purchase Category | Low | Moderate Low | Moderate | Grand Total |
|-----------------------|------------|--------------|----------|-------------|
| Business Service | 60 | 6 | | 66 |
| Facilities | 37 | 2 | | 39 |
| Finance | 25 | | | 25 |
| Home & Office | 43 | 3 | | 46 |
| Marketing | 17 | | | 17 |
| Motoring | 172 | 3 | | 175 |
| Network | 70 | | | 70 |
| People | 45 | 2 | | 47 |
| Printing & Stationery | 1 | | | 1 |
| Technology | 199 | 5 | 1 | 205 |
| Travel | 8 | 2 | | 10 |
| Grand Total | 677 | 23 | 1 | 701 |

In summary, ninety-seven percent (97%) of suppliers assessed have been assigned a residual modern slavery risk rating of low and 3% assigned a residual risk rating of moderate-low. One supplier (technology category, overseas supplier) has been assigned a residual risk rating of moderate. That supplier is not presently directly engaged by RACQ but is sourced through a reseller which:

- is subject to contractual requirements to identify and address modern slavery in its own operations and supply chain; and
- publishes a modern slavery statement in accordance with the Act, which has been reviewed by the Contract Owner.

²² "Risk level" refers to the overall risk level and is not modern slavery risk-specific.

Case Study



Club Assist

During the reporting period, we engaged with one of our key suppliers, Club Assist, part of the Australian Motoring Services Group (Club Assist), to better understand its approach to modern slavery prevention, detection and reporting. Club Assist supplies RACQ with automotive batteries and was selected for a deep-dive due to the inherent risk of modern slavery in its operations and supply chain as an importer of lead-acid and lithium batteries. Club Assist is also owned by the motoring clubs across Australia, including RACQ.

In FY25, the RACQ Roadside Assistance fleet responded to 262,788 battery-related problems – the primary reason for callouts. RACQ Auto also offers a range of vehicle services, including battery solutions.

RACQ Group Procurement representatives met with procurement representatives from Club Assist to discuss its approach to modern slavery²³. We intend to continue to work with Club Assist and implement similar initiatives to improve our own response to modern slavery during the 2026 financial year, including uplifts to our staff education and training, extending training to include Directors, and auditing a supplier in a high-risk industry.

²³ As outlined in its Modern Slavery Statement: [Club-Assist-Modern-Slavery-Statement-FY24.pdf](#)

Addressing the Risk of Modern Slavery in our Operations and Supply Chain

RACQ is committed to operating its business with integrity and to high standards of corporate governance practices and ethical conduct by all directors and employees of RACQ and its controlled entities.

RACQ has a suite of internal policies and procedures which inform the way we work and aim to ensure that we operate in an ethical and responsible manner. These include:

- RACQ Code of Conduct
- Discrimination, Harassment and Workplace Bullying Prevention Policy
- Diversity and Inclusion Policy
- Group Remuneration Policy
- Group Conflict of Interest Policy
- Internal Fraud Policy
- Group Whistleblower Policy
- Group Procurement and Supplier Management Policy and procedures
- Supplier Code of Conduct
- Strategic Partnerships Policy
- Group Risk Management Framework
- Group Risk Management Strategy
- Group Risk Appetite Policy and Group Risk Appetite Statement
- Sustainability Framework
- Group Responsible Investment Policy
- Customer Care and Conduct Framework
- Supporting Vulnerable Customers Policy

Our values



Show Care

Behaviours

- Prioritise safety and look out for each other.
- Listen, empathise, and communicate openly with our members and each other.
- Embrace difference and be inclusive.

Risk Behavioural Expectations

- Be inclusive and respect differences, so that everyone feels safe to bring their authentic self to work.
- Speak to the member, not the policy.
- Show empathy and support our members and each other especially in vulnerable moments.



Own It

Behaviours

- Be clear on accountabilities and hold ourselves and each other to account.
- Build trust by doing the right thing by members and each other.
- Create a safe environment for people to speak up.

Risk Behavioural Expectations

- Know, understand and manage your responsibilities including adherence to compliance obligations.
- Take ownership of risks and proactively remediate problems when things go wrong to ensure we have effective controls.
- Keep and maintain up to date risk records.
- Serve members by acting with honesty and integrity at all times.
- Work to resolve complaints diligently, fairly and quickly to drive better outcomes for our members and people.
- Protect our members and community by safeguarding confidential and personal information.
- Listen to understand, display empathy and treat others with respect.
- Promptly speak up about inappropriate conduct and behaviours.
- Embrace constructive feedback.



Embrace Learning

Behaviours

- Learn from our successes and failures to continuously improve.
- Constructively challenge the status quo and embrace new ideas.
- Seek diverse views and encourage learning and growth.

Risk Behavioural Expectations

- Be open about mistakes, understand what happened and remediate.
- Share your learnings from your successes and failures with others.
- Encourage continuous improvement through collaboration and diversity of thought.



Deliver Excellence

Behaviours

- Ensure the work we do adds value and has a positive impact.
- Work together and help each other succeed.
- Make informed decisions and act decisively.

Risk Behavioural Expectations

- Act early to manage risks and issues as soon as they are identified.
- Consistently deliver on business and risk related responsibilities in a timely manner.
- Seek diverse perspectives including the outside in to gain a multi-dimensional view of risk to inform decision making.

Risk Management

Building a robust risk management culture and framework remains a core priority. RACQ has a Risk Management Framework that enables it to appropriately develop and implement strategies, policies, procedures and controls to manage different types of material risks and provides the board with a comprehensive view of material risks. The Risk Management Framework allows the organisation to prioritise risk more effectively and to make informed risk decisions to assist in the delivery of RACQ's strategy.

Accountability

RACQ Group adopts a three lines of accountability model to support effective risk governance through clarity of responsibilities and independent oversight. The three lines are:

- 1st Line of Accountability: The business owns, identifies, understands, assesses and manages their risk and compliance, in line with policy and procedures that reflect the Board's risk appetite.
- 2nd Line of Accountability: Risk and Compliance functions own and maintain effective Group risk and compliance frameworks, systems and policies.
- 3rd Line of Accountability: Internal Audit provides independent and objective assurance over the adequacy and effectiveness of governance, risk management and internal control frameworks.

Education

RACQ has a mandatory electronic learning course to educate selected individuals with direct links to RACQ supply chains in our organisation on the risks of modern slavery and how to escalate concerns about or potential occurrences of modern slavery. All managers, contract owners and contract managers, together with Group Procurement operational staff were issued compulsory modern slavery e-learning to improve awareness and understanding of the risks of modern slavery. 171 of our employees completed the e-learning during FY25.

Procurement Practices

RACQ assesses and segments suppliers in accordance with contract value and risk level. Procurement procedures require that:

- a modern slavery risk assessment is conducted for all new purchase activities
- modern slavery risks are monitored throughout the supplier relationship
- procurement employees assess compliance with procurement procedures before supplier contracts are signed

Our template request for proposal (RFP) and request for quotation (RFQ) documents require candidates to provide information about any policies in place addressing modern slavery and systems to monitor compliance with these policies.

RACQ's template supplier contracts include a clause requiring the supplier to take actions in accordance with its policies and procedures to identify and address the risk of modern slavery in its operations and supply chains and notify RACQ in writing as soon as reasonably practicable upon becoming aware of, or having a reasonable basis for suspecting, instances of modern slavery in its operations or supply chain.

RACQ's Supplier Code of Conduct

As part of our ongoing commitment to integrity, transparency, and responsible business practices, during FY25 the RACQ Boards approved a new [Supplier Code of Conduct](#) which is published on our website. RACQ expects all suppliers to adhere to the principles outlined in this Supplier Code of Conduct. The Code provides guidance on the environmental, social, and governance (ESG) expectations for all suppliers and business partners, including with respect to modern slavery. The Code outlines RACQ's expectation that suppliers uphold human rights and operate in a manner that respects and protects the dignity of individuals, ensure that their supply chains are free from forced, bonded, or child labour and, where required by law, report any risks of modern slavery and provide annual assessments of their operations and supply chains. The Code also provides suppliers with guidance about how to report concerns anonymously.

Reporting

RACQ provides access to an external reporting service (Stopline) which is an independent and confidential service that operates 24 hours a day, 365 days a year to receive whistleblower reports from our employees and third parties regarding illegal or unethical conduct, including modern slavery. Reporting of information can be made anonymously. In FY25, no instances of suspected modern slavery were reported.

Assessing the effectiveness of our actions

RACQ undertakes an annual review of its contracted suppliers as outlined in this statement. We review the residual risk ratings and act to further investigate with the contract manager where necessary to mitigate and monitor the risk. Following our FY25 review, all RACQ contract owners and managers responsible for the management of a supplier with a residual risk rating of moderate-low or higher across the RACQ Group were advised of that assessment and advised to monitor for 'red flags.' Those contracted suppliers with a residual risk rating of moderate-low or above have been tagged in RACQ's contract management system.

RACQ conducts an annual review of the adequacy of staff modern slavery training to identify whether any changes are required to the content or audience.

We have adopted a monitoring plan to periodically review application of modern slavery policy requirements. The objective of the plan is to assess how policy design addresses compliance obligations and the effectiveness of controls.

Reflecting on FY25, key improvements have been introduction of our new Supplier Code of Conduct, engagement with Club Assist, and enhanced risk management through our Risk Transformation Program.

RACQ intends to continue to build its maturity in identifying and addressing modern slavery risks in FY26 through:

- uplifts to our procurement policies and procedures
- improved supplier data and increased due diligence during new supplier onboarding
- introducing modern slavery training for directors and enhanced staff training and education
- deep-dive into a supplier in a high-risk industry

Consultation and Approval

Modern Slavery Working Group

In FY25, RACQ's Modern Slavery Working Group (MSWG) met twice to discuss modern slavery risk in RACQ's operations and supply chain. The purpose of the MSWG is to connect with our operational representatives that have direct links to our supply chain, operations and governance to continually seek out initiatives that improve the way we assess effectiveness and manage risk. The MSWG includes senior managers representing each of the reporting entities.

Consultation Process

To ensure an accurate and comprehensive risk assessment, RACQ has consulted with representatives from each reporting entity in developing this Statement.

Consultation with RACQ's owned or controlled entities has involved:

- seeking feedback from RACQ's Modern Slavery Working Group, comprising representatives from our Assistance, Bank, Insurance, Investments and Corporate Services business units;
- circulating a draft of this Statement for feedback to RACQ's Group Executive Team²⁴, Group Company Secretary and leaders in our People & Culture, Mobility Centre, Autoglass, Home Solutions and Technology teams;
- advice from our Group Risk and Compliance team; and
- consultation with contract owners responsible for monitoring suppliers with a residual risk rating of moderate-low or higher.

Statement Approval

RACQ's Modern Slavery Statement covering the 2025 Financial Year was approved by the Board of RACQ, the principal governing body of RACQ Group as defined by the Act, on 25 November 2025. This statement is signed by a responsible member of RACQ Group who is authorised to do so.

David Carter
Managing Director and
Group Chief Executive Officer

| Modern Slavery Act requirements | Relevant paragraph(s) |
|--|-----------------------|
| (a) identify the reporting entity | page 4 |
| (b) describe the structure, operations and supply chains of the reporting entity | pages 5-8 |
| (c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls | page 9-10 |
| (d) describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes | page 11-16 |
| (e) describe how the reporting entity assesses the effectiveness of such actions | page 16 |
| (f) describe the process of consultation with: | page 17 |
| (i) any entities that the reporting entity owns or controls; and | page 17 |
| (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement | page 17 |
| (g) include any other information that the reporting entity, or the entity giving the statement, considers relevant. | N/A |

²⁴ Further information about RACQ's Group Executive team is available on RACQ's website: <https://www.racq.com.au/about-us/corporate/group-executive-team>



The Royal Automobile Club of Queensland Limited
ACN 009 660 575 ABN 72 009 660 575
13 1905 | racq.com