



# Modern Slavery Statement

## Financial Year 2025

PEDAL GROUP PTY LTD  
ABN 67 131 402 278



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## About the statement

Pedal Group Pty Ltd has prepared this Modern Slavery Statement (“Statement”) to meet the reporting requirements of the Australian Modern Slavery Act 2018 (Cth) and the United Kingdom Modern Slavery Act 2015. The statement outlines the actions that have been taken by the Pedal Group to identify, assess and address modern slavery risks across our operations and supply chain during the financial year commencing 1 July 2024 and ending 30 June 2025.

This Statement is made on behalf of the reporting entity Pedal Group Pty Ltd (ABN: 67 131 402 278) and its subsidiaries and the entities it owns and controls, including:

- 99 Bikes Pty Ltd (“99 Bikes AU”) (ABN: 87 123 966 665)
- 99 Bikes NZ Limited (“99 Bikes NZ”) (Business Number: 9429047826281)
- Advance Traders (Australia) Pty Ltd (“ATA”) (ABN: 21 130 664 194)
- Pedal Group Property Pty Ltd (“PGP”) (ABN: 66 622 878 808)
- 99 Bikes Limited (“99 Bikes UK”) (Company Number: 03690687)

The Statement was approved by our board on December 12th, 2025.

We welcome feedback, questions and collaboration from our stakeholders.

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# 1. A message from our CEO

I am pleased to present Pedal Group's Modern Slavery Statement for FY25. This year we have continued to make progress focusing on the identification of modern slavery and human rights risks within our supply chain and enhancing our policies and practices.



This year we have conducted our first human rights salience assessment that has enhanced our visibility and knowledge in relation to modern slavery and other human rights risks in our operations and supply chain. We have used this assessment and knowledge to enhance our existing policies and codes by updating and expanding our Supplier Code of Conduct and Supplier Self Assessment survey and creating our first Human Rights Policy.

We have focused on our human rights governance, creating a new due diligence process aligned with the OECD Guidelines for Responsible Business Conduct and have a new ESG Leader at Pedal Group to provide guidance and resources to our programs in this area.

Looking forward, we are firmly focused on engaging and collaborating with our suppliers to improve our supply chain transparency, expand our due diligence and ethical sourcing processes across more suppliers in our business.

As a purpose driven business with a B corp certification, we are committed to continuous improvement and stakeholder consultation. We are proud to sell products that enrich the lives of our customers and continue to focus on the identification and mitigation of modern slavery risks in our supply chain and operations.

This Modern Slavery Statement was approved by the Board of Pedal Group Pty Ltd, on behalf of itself, and all owned entities in December, 2025.

Andrew Garnsworthy  
Pedal Group CEO

25th November 2025

## 2. Our structure

99 Bikes, founded in 2007 by Matt Turner in Milton, Queensland, started as a small business with an original bike store that could only fit 99 bicycles! Over the years, we have grown to become Australia's largest bike retailer, with more than 70 stores nationwide. In 2013 we established Pedal Bikes, our bike brand, to offer our customers more affordable recreational bikes. Our Pedal Bike's range has expanded, now offering a wide range of bikes inclusive to all types of bike riding. In 2020 we expanded in New Zealand with the opening of 99 Bikes retail stores and commencing wholesaling operations under the Advance Traders New Zealand (NZ) brand. In 2022 Pedal Group also expanded into the United Kingdom (UK). Today the Pedal Group is proud to be Australia's largest bicycle company, backed by major investors, Flight Centre Travel Group & the Turner Family, and has over 1,000 shareholders that are current or former employees and contractors.

In FY25 we were proud to expand our 99 Bikes store network in Australia with new stores in Carnegie and Mornington in Victoria, Adamstown in New South Wales and Hobart in Tasmania. We also added a new store in the United Kingdom with our Walton location servicing south west London.

All Pedal Group businesses have a shared set of values and share a purpose to enrich mind, body, earth, or soul with the freedom of riding. We are proud to be known for our passion for cycling, our community engagement, and our commitment to finding the right bike for every rider. Purpose is one of our 10 Philosophies that we passionately believe in, and it drives both long and short term decision making in our businesses.



The World's Most Approachable Bike Shop. We take our customers from their first bike through to their dream bike. From beginners to recreational riders to enthusiasts, we are the experts; we add value, and we always maintain our approachable manner.

Visit our websites for more information: [99 Bikes AU](#), [99 Bikes NZ](#) & [99 Bikes UK](#)



Advance Traders Australia & New Zealand is a wholesale distributor, offering bike shops an extensive range to match the needs of every customer. We are passionate about helping our retail partners succeed by providing a multi-brand offering with products priced to sell. We strive to be "Easy to Deal With" in all of our interactions.

Visit our websites for more information: [Advanced Traders AU](#) & [Advance Traders NZ](#)



Pedal Group Property (PGP) is a Pedal Group owned business responsible for purchasing and managing all company-owned real estate. PGP currently owns over 25 99 Bikes retail locations across Australia and New Zealand.

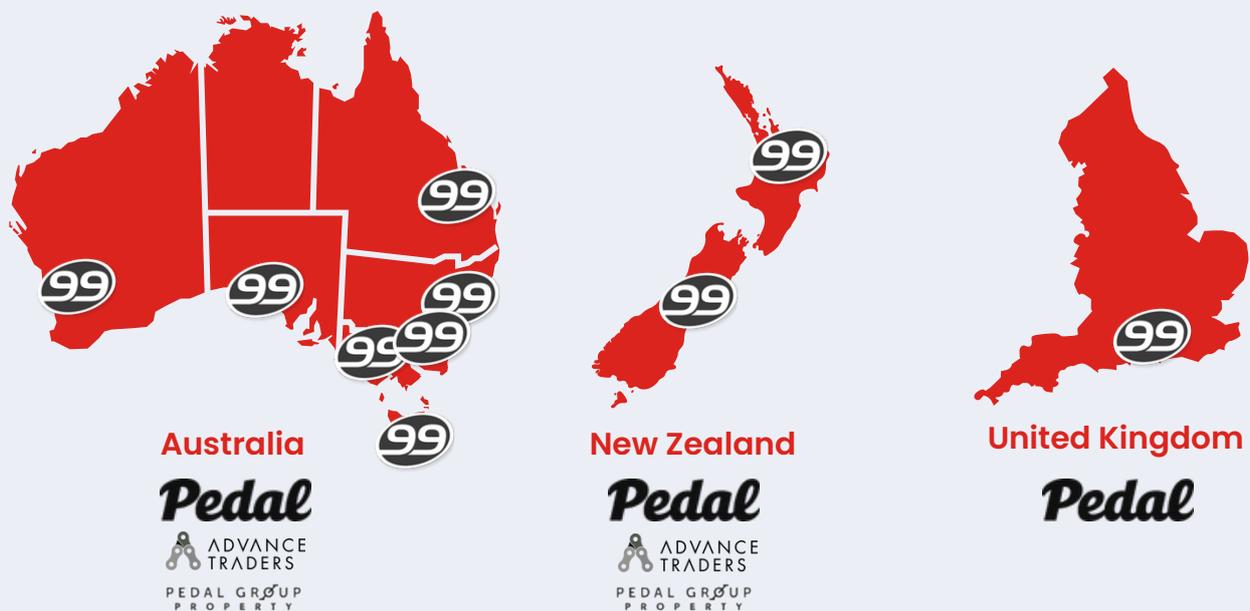
## Our operations

Headquartered in Brisbane, Australia, Pedal Group has operations in Australia, New Zealand and the United Kingdom. Our primary operations in these locations are bicycle retail shops including bicycle workshops and online stores. We do not directly manufacture products instead procure our range from suppliers globally. We also have wholesale operations in Australia and New Zealand servicing hundreds of independent bicycle stores.

We operate support offices to support our retail and wholesale operations and operate warehouses in two locations in Australia, as well as partnering with third party logistics providers.

We also own and manage property in Australia and New Zealand that are leased to 99 Bikes stores and/or sub leased to third parties.

Our own brand, Pedal, is designed in Australia, manufactured by third parties in China and sold in Australia, New Zealand and in the United Kingdom through our 99 Bikes stores and Advance Traders.



## Our people

Currently Pedal Group employs approximately 990 employees globally, with the majority employed by 99 Bikes Australia.

In FY25 all employees of the Group were employed in Australia, New Zealand and the United Kingdom with the majority employed under the General Retail Industry Award, which sets minimum pay and conditions for specific categories of workers. The majority of our warehouse employees are employed under the storage services and warehouse award. The remainder of our employees have individual employment contracts, which provide additional conditions for an individual employee, but cannot reduce or remove the minimum entitlements prescribed under the National Employment Standards.

We undertake reviews of the relevant awards and employment contracts to ensure our workers' entitlements are met. We undertake payroll reviews to ensure our workers are being paid correctly.

## Our supply chain

Our supply chain spans both the goods and services we purchase to operate our business and the products we source to sell to our customers. This includes everything from day to day operational needs, such as store fit outs, technology, and marketing services to the bicycles, components, and accessories that make up our 99 Bikes retail and Advance Traders wholesale offerings.

Goods and services procured include:

- Property
- Professional services and consulting
- Technology products and service
- Office consumables
- Utilities and telecommunications
- Travel services and accommodation
- Catering
- Fleet vans and cars
- Warehouse plant & machinery
- Transport and freight services
- Bikes, accessories and bike related products for resale
- Tools and equipment
- Bike workshop consumables

### Pedal Group's supply chain geography

Our supply chain knowledge and transparency is developing with increased effort in mapping and understanding the origin of our products and raw materials. Our supply chains are global, complex and visibility of our indirect suppliers is a challenge. We currently source products from suppliers in the following countries with the majority of our goods sold produced in China and Taiwan.

- Australia
- New Zealand
- United Kingdom
- Italy
- Poland
- Germany
- Portugal
- Netherlands
- Switzerland
- Spain
- Lithuania
- Hungary
- China
- Taiwan
- Vietnam
- Japan
- Indonesia
- Cambodia
- Malaysia
- United States of America
- Canada
- El Salvador



\*Note this does not include all suppliers to 99 Bikes UK

Pedal Group Supply Chain Map 2025

### 3. Modern slavery risks in our operations & supply chain

In 2025 we conducted a high level Human Rights Saliency Assessment to identify, assess and prioritise our most important (salient) human rights issues to focus our due diligence efforts

Our assessment was primarily desk based research using publicly available information, internal knowledge of our suppliers, adverse media scans and a high level map of our supply chain and operations. The assessment included various risk factors such as country, sector, key input materials and vulnerable populations.

Utilising our existing corporate risk management approach, each human right risk identified was given a likelihood and consequence and overall risk rating. Risks were then categorised as salient (most serious or likely risks of harm to people connected to our operations or supply chain) or other human rights risks. All modern slavery risks were categorised as salient human rights risks.

**Salient Human Rights Risks:** the most serious or likely risks of harm to people connected to our operations or supply chain. These are the issues prioritised for further due diligence as they have the greatest potential negative impact.

**Other Human Rights Risks:** the risks that are less severe but are still important to monitor and review over time.

The majority of the human rights risks identified are in our global supply chain from our direct suppliers through to our indirect suppliers and the raw materials in the products that we sell.

- East Asian region was identified to have the highest risk of human rights violations.
- Migrant workers were identified as a key vulnerable group in our supply chain.
- Key sectors with human rights risks were product manufacturing, raw material extraction and logistics, including both domestic and international freight.

Our assessment identified forced labour and child labour as both salient and modern slavery human rights risks within our supply chain.

Based on our assessment the risk of forced labour has potential to be in our direct supply chain (tier 1 suppliers) and child labour is a risk in our indirect supply chain.

There are 11 Indicators of forced labour defined by the ILO such as debt bondage, retention of identity documentation and restriction of movement. This risk was found predominantly in Taiwan, Malaysia and international shipping which are all within our supply chain.

Whilst we do not currently have visibility on where the raw materials used in our products come from, aluminium, steel, rubber, cobalt, lithium, copper and other metals needed for bikes, electronics and e-batteries have been identified as materials with associated human rights risks including child labour and forced labour in the mining and extraction stage in a range of mining countries.

Labour exploitation human rights risks are commonly associated with vulnerable migrant workers, where workers are treated unfairly through low pay, lack of legal rights and protections, discrimination, unfair treatment and unsafe working conditions. They can also be indicators and related to forced labor so are key risks to monitor within the manufacturing and logistics sectors in our supply chain.

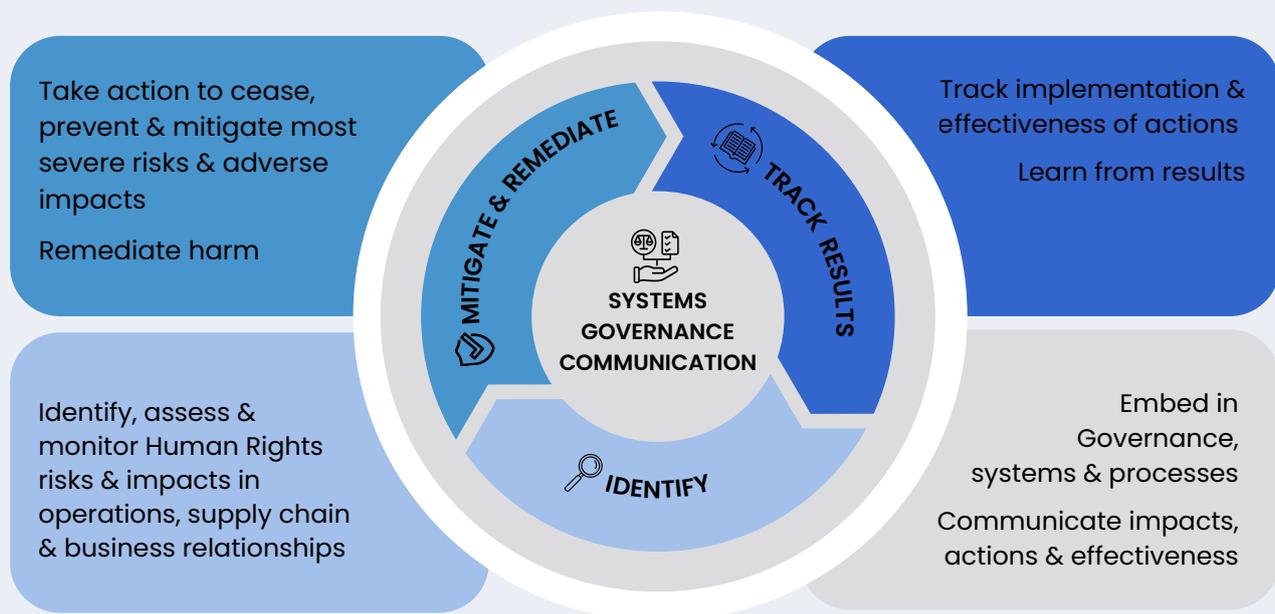
In our assessment we did not identify any modern slavery risks within our operations in Australia, New Zealand and the United Kingdom.

## 4. Actions taken to assess and address modern slavery risks

Pedal Group is committed to undertaking ongoing, risk based human rights due diligence to identify, assess, address, and report on actual and potential human rights risks in our operations and supply chain.

Our due diligence framework has been updated in 2025 and is aligned with the OECD Due Diligence Guidance for Responsible Business Conduct. Our updated framework is shown below:

### Pedal Group Human Rights Due Diligence Framework



#### STEP 1: IDENTIFY

Includes actions such as:

- Supply chain mapping
- Ongoing risk assessment
- Media screening
- New supplier onboarding
- Whistleblowing / reported risks

#### STEP 2: MITIGATE & REMEDIATE

Includes actions such as:

- Focusing on most severe risks
- Supplier engagement & education
- Corrective actions
- Industry collaboration
- Grievance channels
- Remediation of harm

#### STEP 3: TRACK RESULTS

Includes actions such as:

- Action & effectiveness tracking
- Supplier feedback
- Supplier KPIs and audits
- Regular review & continuous learning

#### SYSTEMS, GOVERNANCE & COMMUNICATION

Includes actions such as:

- Leadership & board oversight
- Defined operational responsibilities
- Policies & codes of conduct
- Integration with risk & procurement systems
- Training & awareness
- Modern slavery & ESG reporting

Whilst the modern slavery risks identified in our supply chain are not unique to Pedal Group and are global, complex and systematic issues, we believe it is our responsibility to do what we can to manage, mitigate and influence the risks identified.

We do this through utilising our human rights due diligence framework and have prioritised actions we can take to monitor, mitigate and influence the known risks.

Some actions taken in 2025 include:

- supplier engagement related to human rights risks identified.
- expanded our understanding of our human rights risks in our operations and supply chain through conducting a human rights salience assessment.
- updated our human rights due diligence framework to align with OECD guidelines.
- created a new human rights policy.
- updated and expanded our supplier code of conduct and self assessment.
- set a focus for the majority of key product and logistics suppliers to complete our updated supplier self assessment by end of FY25.
- updated our system for action and effectiveness tracking.
- employed an ESG leader to manage our human rights due diligence process.
- modern slavery risks were reviewed and updated in our corporate register for ongoing governance.

## Forced Labour in the Bicycle Supply Chain

Recent media reports have raised concerns about human rights risks in the bicycle supply chain in Taiwan and Malaysia, specifically related to indicators of forced labour associated with migrant worker recruitment fees and debt bondage. Some of our suppliers were identified in these reports.

In 2025, we initiated targeted engagement with these suppliers to understand the risks, the root causes, reinforce our expectations, and learn more about how we can support them in strengthening practices.

We have seen some early signs of positive changes both within these suppliers and more broadly among other bicycle related companies in Taiwan, with some companies adopting international best practice standards related to debt bondage and recruitment fees.

Although positive steps have been taken, addressing these risks requires ongoing, long term effort, and our suppliers in Taiwan and Malaysia remain a priority focus for Pedal Group.

Pedal Group has built a clear set of practices, codes and policies which our people are required to understand and adhere to across all entities, excluding 99 Bikes UK. The suite includes:

- Employee contracts
- Award and enterprise agreements
- Supplier contracts
- Code of Conduct
- Antibullying, harassment and discrimination policy
- Whistleblowing policy
- Occupational Health and Safety policy
- Sexual Harassment policy
- Dispute Resolution policy
- Domestic and family abuse policy
- Communication, email and internet policy
- Annual leave / flexible working arrangements policy
- Parental leave policy
- Drug, alcohol and smoking policy
- Human rights policy (new)

Pedal Group has compulsory modern slavery training for leadership and key teams. We continue to look for opportunities to build capability within our team in relation to modern slavery and human rights risks.



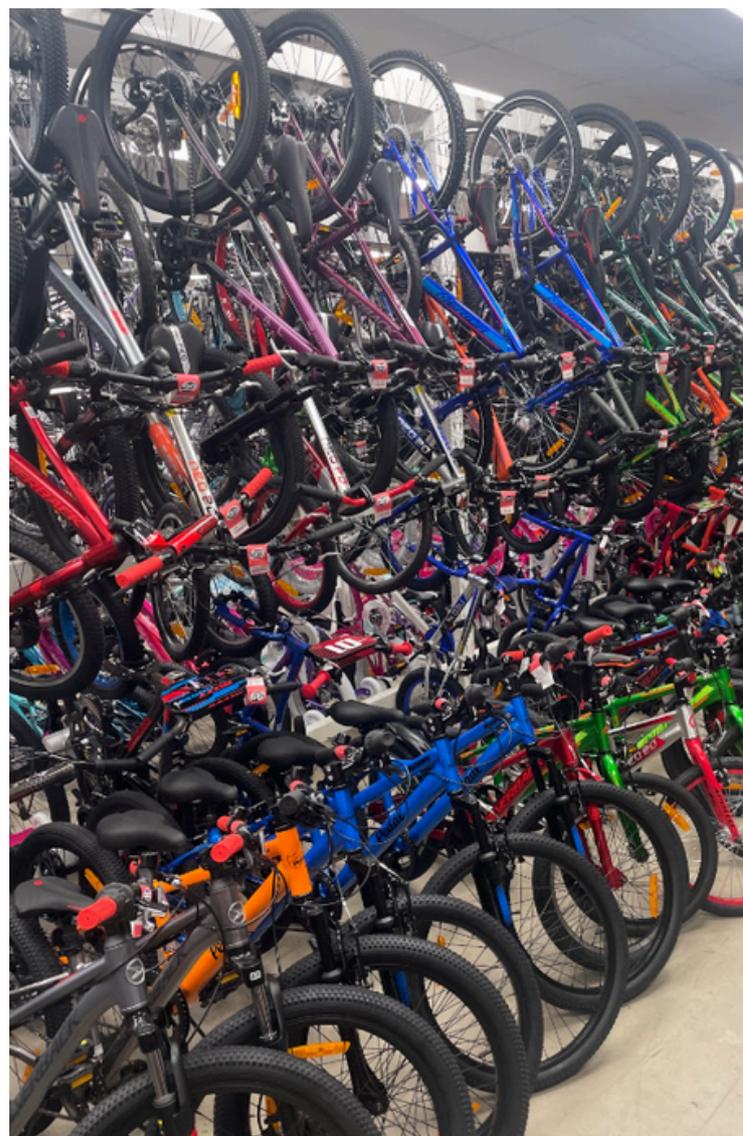
## 5. Measuring effectiveness of our actions

Pedal Group continually monitors its actions to assess and address modern slavery risks using a combination of tools and measures.

Below are the measures and indicators we use to measure our effectiveness at assessing and addressing modern slavery risks across all our reporting entities:

- Percentage of product suppliers who have completed our supplier code of conduct self assessment.
- Percentage of the leadership team and key teams that have completed modern slavery training.
- Number of issues found through media screening and monitoring.
- Monitoring responses to any modern slavery issues or concerns raised with suppliers.
- Monitoring grievances raised through our whistleblowing and other mechanisms in our operations.
- Associated policies and codes reviewed and updated on regular basis.

Our tools and systems are developing as our supply chain knowledge, supplier engagement and actions taken develop and evolve. We plan to bring in measures relating to supply chain visibility, grievance mechanisms in our supply chain and factory audit numbers in the near future.



## 6. Consultation with owned or controlled entities

This statement has been prepared in consultation with each of the reporting entities owned and controlled by Pedal Group.

The reporting entities covered by this statement have common directors, board and executive team, operate in the same sector, use many of the same suppliers and commonly share policies and processes.

Senior management of the reporting entities have been engaged, consulted and informed of the actions taken throughout this reporting period and forward looking plans through meetings, consultation, and email correspondence.

## 7. Looking forward

Looking forward in the next 12 months we plan to:

- Onsite factory visits from our team at selected key suppliers.
- Engagement with suppliers focusing on forced labour risks.
- Further engagement with our Pedal Brand suppliers including ensuring third party auditing of manufacturing facilities and investigation into the raw materials.
- Further training for leadership and key teams including updating our modern slavery training.
- Create relevant templates and educational materials for our suppliers to use to strengthen their own supply chain due diligence.
- Continue to improve our supply chain transparency to improve our risk assessment of human rights risks.
- Complete an annual adverse media screening.
- Seek out and participate in relevant industry groups addressing human rights.



## 8. Appendix 1

### Modern slavery Act 2018 (Cth) reporting criteria

This Statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018 (Cth). The table below identifies where each criterion of the Act is disclosed within sections of this Statement.

Reporting Criterion (as per s16 of the Act)	Description	Location in report
Identify the reporting entity	Name of the reporting entity, ABN, corporate structure, and reporting period covered by the statement.	1. Front page and about this statement
Structure, operations and supply chains	Describe the entity's structure, operations, and supply chains – including countries of operation, goods and services, and key supplier relationships.	2. Our structure, operations and supply chain
Risks of modern slavery practices	Outline risks of modern slavery in your own operations and supply chains, and how they have been identified and assessed.	3. Modern slavery risks in our operations & supply chain
Actions taken to assess and address those risks	Actions taken, due diligence processes, remediation and supplier engagement initiatives.	4. Actions taken to assess and address modern slavery risks
Assessing effectiveness	How effectiveness is measured (KPIs, audits, supplier outcomes, remediation tracking).	5. Measuring effectiveness of our actions
Consultation process	How consultation occurred across controlled entities or joint ventures.	6. Consultation with owned or controlled entities
Other relevant information	Additional governance, training, stakeholder engagement, and continuous improvement initiatives.	7. Looking forward

We welcome feedback, questions and collaboration from our stakeholders.

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