

# Modern Slavery Statement 2025

**Pamsim Pty Ltd ABN 34 083 219 318 and Jefferson Ford Pty Ltd ABN 27 005 620 897**

## Reporting Period

This Modern Slavery Statement is a joint statement made by Pamsim Pty Ltd and Jefferson Ford Pty Ltd (together, the Companies) in the reporting period 1 January 2025 to 31 December 2025.

This statement sets out the steps taken by the Companies during the reporting period to prevent modern slavery within their business operations, and supply chains.

The Companies recognise their obligations under the Modern Slavery Act 2018 (Cth) and the importance of protecting human rights and ensuring their employees, customers (guests) and those within their supply chain operations are free from all forms of modern slavery.

## Covered Entities

This statement covers the following entities:

- Pamsim Pty Ltd
- Jefferson Ford Pty Ltd

The Companies have prepared this statement jointly as they operate within a closely aligned automotive retail group structure and share similar operational processes, governance oversight, policies and supply chain management practices.

The Companies consulted with each other in the preparation of this statement, including through management discussions and review of operational practices, policies, and supplier engagement processes.

## Business Structure, Operations and Supply Chains

### Pamsim Pty Ltd

During the 2025 reporting period, Pamsim Pty Ltd's structure did not change. The company continues to trade as Nunawading Toyota operating as a motor vehicle dealership in Victoria under a franchising arrangement with Toyota Motor Corporation Australia Limited (TMCA). As at 31 December 2025, Pamsim Pty Ltd's financial year end, the company employed 104 staff.

### Jefferson Ford Pty Ltd

Jefferson Ford Pty Ltd operates as a motor vehicle dealership in Victoria under a franchising arrangement with Ford Motor Company Australia. The business undertakes similar activities to Pamsim Pty Ltd including vehicle sales, servicing, parts and accessories sales, and the provision of

finance and insurance products to customers. As at 31 December 2025, Jefferson Ford Pty Ltd's financial year end, the company employed 244 staff.

The Companies' key business operations include:

- the sale of new and used vehicles
- the sale of parts and accessories and aftermarket (car care) products
- the full servicing of new and used vehicles
- the provision of finance, insurance and warranty products to vehicle customers (guests)

The Companies' supply chains include:

- motor vehicles and parts supplied through manufacturer franchise networks,
- consumables such as fuel, oil, and lubricants
- services including car and office cleaning, waste disposal, vehicle and parts transportation
- IT hardware and software
- telecommunications,
- office supplies and professional services

### **Modern Slavery Risks in our Operations and Supply Chains**

The Companies are committed to ethical and fair conduct of their managers, employees, contractors and suppliers. This commitment is demonstrated through policies, employment practices and efforts to combat modern slavery in all its forms.

The Companies are committed to working within their operations and supply chains to prevent the existence of a modern slavery environment wherever possible.

### **Our Operations**

The automotive industry in Australia relies on the importation of motor vehicles, accessories and spare parts from overseas.

Pamsim Pty Ltd sources the vast majority of products from Toyota Motor Corporation Australia Limited (TMCA) as part of a franchise arrangement. Both TMC (Global) and TMCA's Anti-Modern Slavery Statements 2025 provide specific details of their targeted approach to modern slavery risks both locally and abroad, and we would expect that TMCA's operations would comply with the Modern Slavery Act 2018.

Jefferson Ford Pty Ltd sources the majority of products from Ford Motor Company of Australia as part of a franchise arrangement. Ford Motor Company's (FMC) Global Modern Slavery and Human Trafficking Transparency Statement provides details of their targeted approach to modern slavery risks and we would expect that FMC's operations would comply with the Modern Slavery Act 2018.

The Companies operations are largely performed in-house, by its own employees. There is very little reliance on external labour hire or local contractors. As a result, the Companies consider the risks of modern slavery practices within its business operations to be low. The Companies operate primarily within Victoria, Australia and all staff are employed and remunerated under the Federal Award

system. The Fair Work Act National Employment Standards are incorporated into all employment contracts.

The Companies work closely with the Victorian Automobile Chamber of Commerce on policy determination and interpretation and it has direct access to legal support services.

The Companies have a direct association with the Department of Home Affairs on any skilled migrant labour intake and work within the prescribed legislative framework.

Given our operations are solely in Australia, our geographic risk of modern slavery remains low according to the Global Slavery Index. There is no identified vulnerability to modern slavery in our industry sector within Australia.

### **Our Supply Chains**

The manufacture and supply of motor vehicles and parts to Australia is handled by TMC global and TMCA for Pamsim Pty Ltd and the Ford Motor Company (FMC) for Jefferson Ford Pty Ltd.

During late 2024 to early 2025, Pamsim Pty Ltd.'s dealer management system changed from Pentana to Revolution, Revolution is wholly owned by TMCA and its main products are software management systems for automotive dealers. Products are split between two main categories; the sourcing of technology, and supply and support of the software. Revolution is included in the 2025 TMCA Modern Slavery Statement.

Given that our main supplier of vehicles and parts, and information technology (for Pamsim Pty Ltd), are sourced via our franchise agreement with TMCA and FMC, modern slavery risk minimisation activities are focused on the next tier of local suppliers. Typically, these include consumables such as fuel, oil, and lubricants and services including car and office cleaning, waste disposal, transportation of vehicles and parts, IT hardware, telecommunications, and office supplies, trades and professional services.

### **Actions to Assess and Address Modern Slavery Risks**

In 2024, the Companies introduced an online Contractor / Service Provider prequalification and induction database. The Companies continue to ask contractors and suppliers to complete a detailed questionnaire on their business operations, including compliance with a range of legislative and regulatory frameworks. A component of the prequalification questionnaire asks the contractor / supplier if they are obligated to report under the Modern Slavery Act (Cth) 2018, and if so, requires them to attach a copy of their Modern Slavery Statement. The potential contractor / supplier is also required to complete a company induction that includes in part, a commitment to comply with our ethical and fair conduct standards.

Note: A 2025 audit of contractor prequalification questionnaires indicates that the vast majority of suppliers / contractors are not required to report under Modern Slavery Act (Cth) 2018.

Over the years, the Companies have developed an extensive suite of employment policies and procedures that reinforce its commitment to ethical and fair conduct. This includes the Company Code of Conduct, the Employee Handbook, New Starter documents and an array of policies and procedures that are made available on the company intranet. The inclusion of a Modern Slavery

statement to the company's suite of policies reinforces the company's commitment to the Modern Slavery Act and protecting human rights throughout the business. All employment policies are reviewed periodically and updated to ensure compliance with legislative changes or community standards.

The Companies' policies reviewed during 2025 included:

- Code of Conduct applicable across the Companies– which applies to all employees and clearly defines the values of the business and the expectation that all staff, contactors, and suppliers will work within its framework.
- Personal Conduct Policy – grievance and complaints processes
- Employee Handbook – Modern Slavery included
- Employment Contracts
- Notifiable Data Breach Policy
- Online Incident Register
- Modern Slavery Policy
- Whistleblowers policy

The annual Minimum Wage Case (MWC) review was completed in July 2025. This yearly review ensures all employees receive at least the minimum base award rate of pay and took into account minimum award adjustments determined by the Fair Work Commission, and handed down in June 2025. In addition to the annual review, quarterly audits of employee salaries and payments undertaken throughout 2025 ensured employees were remunerated in accordance with the Fair Work Commissions general principle that employees should be paid at least the equivalent of the minimum award rate for all hours worked.

The Companies continue to work within the required legislative frameworks for the recruitment, and ongoing employment of all its staff from both within Australia and from overseas.

The Companies' Whistleblower Policy offers an anonymous channel to report unethical conduct or behaviour. This includes illegal acts and modern slavery violations. Any reports are treated confidentially and are fully investigated. If the complaint is in relation to a supplier, the Companies will notify the supplier and work with them to resolve the matter and reinforce our code of conduct and ethical standards. A breach of the modern slavery principles may well result in the termination of our business relationship. The Whistleblower Policy is available to all staff and we encourage employees to report any concerns.

## **Assessing the Effectiveness of our Actions**

The Companies assess the effectiveness of their actions through a combination of qualitative and quantitative measures including:

- periodic internal audits of employment practices and payroll systems
- monitoring supplier onboarding completion rates and responses to modern slavery questionnaires
- tracking the number and nature of whistleblower reports and grievances
- reviewing supplier compliance documentation, including Modern Slavery Statements where applicable
- management review of high-risk suppliers and escalation where required

These processes are reviewed annually to ensure they remain appropriate to the size and risk profile of the Companies' operations and supply chains.

## **Key Areas of Action 2026**

The Companies will continue to identify areas of focus to strengthen its measures and prevent modern slavery in all parts of its business. Key initiatives will include:

- Identify new high risk suppliers for review of their ongoing compliance
- Finalise and distribute a Supplier Code of Conduct

## **Approval**

This statement was approved by the principal governing bodies of Pamsim Pty Ltd and Jefferson Ford Pty Ltd on 5 March 2026.

This statement is signed by Brett Jefferson in his role as CEO and Director of the Companies on 5 March 2026.

A handwritten signature in black ink, appearing to read "Brett Jefferson". The signature is written in a cursive, slightly stylized font.

**Brett Jefferson**

**CEO and Director Pamsim Pty Ltd and Jefferson Ford Pty Ltd**

5 March 2026