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# MODERN SLAVERY STATEMENT

2022



# A MESSAGE FROM OUR CHAIR AND CEO

Welcome to carsales.com Ltd's (**carsales'**) third Modern Slavery Statement. This Statement outlines the actions taken in the 2021-22 financial year to minimise the risk of modern slavery in the operations and supply chains of carsales and its controlled entities (**carsales Group**).

Since publishing its [FY21 Modern Slavery Statement](#) and [FY20 Modern Slavery Statement](#), carsales has continued to improve its processes for identifying and addressing modern slavery risks across the carsales Group.

Key highlights in FY22 include:

- introducing a new supplier training program which has facilitated our engagement with high-risk suppliers to increase their awareness of modern slavery risks;
- rolling out supplier screening processes for our newly acquired entities and international subsidiaries; and
- completion of modern slavery training by all executive and senior leaders in Australia.

carsales is committed to actively assessing and managing modern slavery risks within its own supply chains and the supply chains of its controlled entities and suppliers. This work will continue into FY23 with the integration of modern slavery processes within our new acquisitions, ongoing enhancements to our modern slavery training program, as well as the development and implementation of a policy addressing non-compliant suppliers.

This Statement was approved by the carsales.com Ltd Board on 15 December 2022.



Pat O'Sullivan  
**Non-Executive Chair**  
for and on behalf of the Board  
of carsales.com Ltd



Cameron McIntyre  
**Chief Executive Officer**  
carsales.com Ltd



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PART A -  
REPORTING  
ENTITY AND ITS  
STRUCTURE,  
OPERATIONS AND  
SUPPLY CHAINS



## ABOUT CARSALES.COM LTD

carsales (ASX: CAR) (ACN 074 444 018) operates the number one online automotive classifieds business in Australia, founded in Melbourne 25 years ago. While carsales has maintained its roots in Melbourne, it now has operations in 10 countries and 1,700 team members around the world. carsales' recent acquisition of Trader Interactive in North America cements its position as a truly global leader in digital vehicle marketplaces.

carsales' purpose is to make buying and selling a great experience for consumers, dealers and manufacturers alike, whether it's a car, bike, boat, truck, caravan or tractor.

carsales develops world leading technology and advertising solutions to help its customers buy and sell with confidence across its operating countries, regardless of their level of vehicle knowledge or enthusiasm.



# OPERATIONS OVERVIEW

carsales owns the leading network of automotive and non-automotive classifieds sites in Australia and is the go-to place to buy and sell cars, bikes, boats, trucks, caravans and much more in many countries around the world. Its key operations include:

- **Online Advertising Services**
  - Classified advertising which allows our private and dealer customers to advertise automotive and non-automotive goods and services for sale across the carsales network.
  - Display advertising involves carsales' corporate customers, such as automotive manufacturers and finance companies, placing display advertising for their brand or vehicle on carsales' websites.
- **Data, Research and Services**
  - This segment comprises a diverse range of solutions for our customers including software as a service, research and reporting, valuations, appraisals, website development and hosting and photography services.
- **carsales Americas**
  - carsales operates digital non-automotive marketplaces in the United States and Canada through its subsidiary Trader Interactive. carsales owned 49% of Trader Interactive during FY22 and exercised a call option to acquire the remaining 51% which was completed early in FY23.
- **carsales Asia**
  - South Korea – Encar.com is the market leading digital automotive classified business in South Korea (100% owned).
  - Redbook Asia – provides automotive data services in New Zealand, Malaysia, Thailand and China.
- **carsales Investments**
  - This segment comprises our standalone investments in the consumer and wholesale tyre markets, vehicle inspections and mobility as a service.



Further information can be found in our [FY22 Annual Report](#).

# CARSALES' CONTROLLED ENTITIES

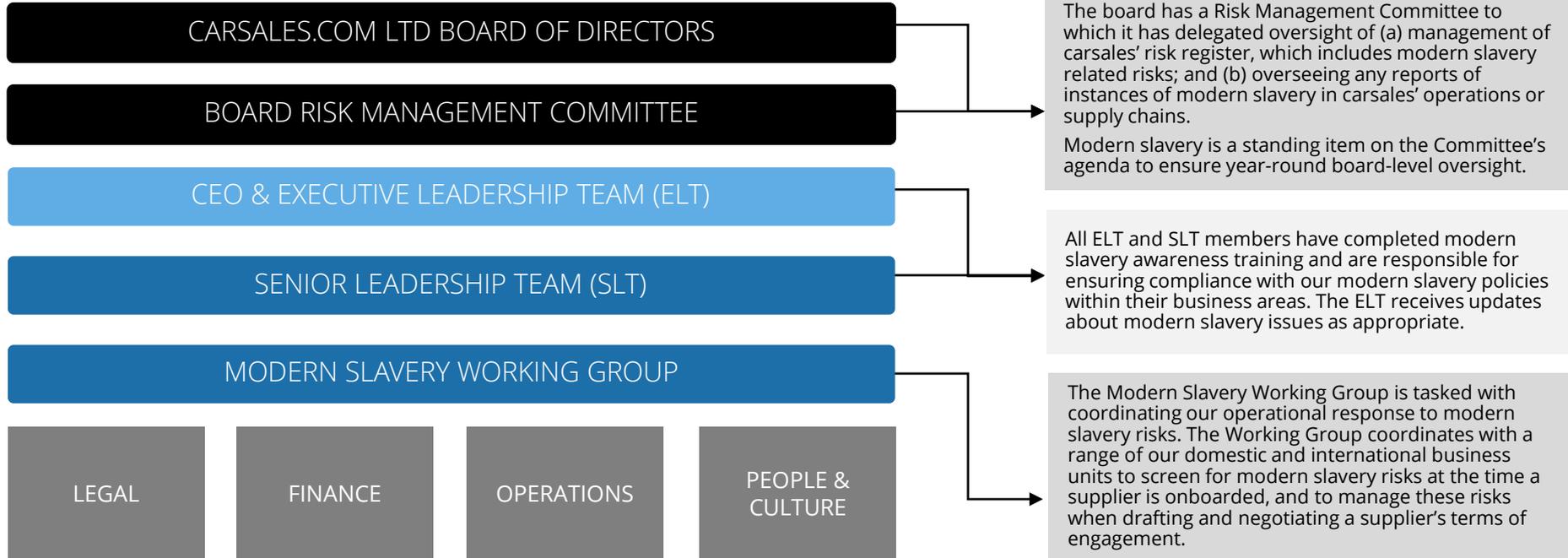
carsales controls various entities in Australia and overseas, including those listed below.

Country	Entities
Australia	Appraisal Solutions Australia Pty Ltd, AS1 Holdings Pty Ltd, Automotive Data Services Pty Ltd, carsales Argentina Pty Ltd, carsales Finance Pty Ltd, carsales Foundation Pty Ltd, carsales Holdings Pty Ltd, carsales Latam Pty Ltd, carsales.com Investments Pty Ltd, CS Motion Australia Pty Ltd, CS Motion Development Pty Ltd, CS Motion Holdings Pty Ltd, CS Motion Technologies Pty Ltd, Discount Vehicles Australia Pty Ltd, Equipment Research Group Pty Ltd, i-Motor Pty Ltd, RedBook Inspect Pty Ltd, carsales Tyre Holdings Pty Ltd, Tyresales Pty Ltd, Tyreconnect Pty Ltd, Transport Ventures Pty Ltd and Webpointclassifieds Pty Ltd
New Zealand	Auto Information Limited
USA	Trader Interactive, LLC (minority interest in FY22)
Chile	carsales Chile SpA, Chileautos SpA, DeMotores Chile S.p.A
Argentina	DeMotores S.A
South Korea	Encarsales.com Ltd
Malaysia	Red Book Automotive Services (M) Sdn Bhd
China	Red Book Automotive Data Services (Beijing) Limited
Thailand	Automotive Data Services (Thailand) Company Limited
Mexico	carsales Mexico SAPI De CV



# GOVERNANCE STRUCTURE

carsales adopts a multi-layered governance approach to address the risks of modern slavery, as described below. Further information about our corporate governance arrangements is set out in our [FY22 Corporate Governance Statement](#).



# GOVERNANCE FRAMEWORK

## GLOBAL CODE OF CONDUCT

Our [Global Code of Conduct](#) applies to all officeholders and employees. It prescribes high standards of behaviour reflecting both legal obligations and stakeholder expectations.

## SUPPLIER CODE OF CONDUCT

Suppliers are expected to adhere to our [Supplier Code of Conduct](#). This sets out required standards and behaviours for suppliers – including respect for human rights and the avoidance of modern slavery in suppliers' own supply chains.

## GLOBAL WHISTLEBLOWING POLICY

Our [Global Whistleblowing Policy](#) provides an independent whistleblower hotline, supported by Deloitte, to allow for confidential disclosure. We are committed to maintaining the anonymity of any whistleblower and providing the full protection required by law.

## PROCUREMENT FRAMEWORK

Our [Procurement Framework](#) ensures the integration of modern slavery risk controls into our procurement systems and processes. For example, as part of the Purchase Order process, suppliers are asked to complete our Supplier Questionnaire and accept our Supplier Code of Conduct.

## HUMAN RIGHTS POLICY

We are committed to respecting human rights and complying with all laws in the countries in which we operate. Our [Human Rights Policy](#) reflects our commitment to the ten principles of the United Nations Global Compact.

## RISK MANAGEMENT POLICY

Our [Risk Management Policy](#) reflects a comprehensive strategy to identify, evaluate and mitigate the risks relevant to our operations. Modern slavery risks are covered by the Risk Management Policy and identified on carsales' risk register.

# SUSTAINABILITY

## SUSTAINABILITY REPORT 2022

carsales understands that it relies on a licence to operate granted by its wider community and that this licence relies upon carsales continuing to act as a good corporate citizen.

carsales is committed to monitoring and developing its sustainability strategy and in FY22 established a Sustainability Committee. As an online services business, carsales' environmental impact is relatively low; however we continually strive for improvements, and FY22 saw carsales' Australian operations formally achieve carbon neutrality for FY21 in accordance with the Australian Government's carbon-neutral certification program Climate Active for the first time.

carsales' Sustainability Report for FY22 outlines carsales' approach to assessing, mitigating and managing a range of social, environmental and governance (ESG) risks.

The report also provides insight into our unique culture, how we attract and retain the very best talent, and seek to have a positive impact on our industry and community.

A copy of our FY22 Sustainability Report is available [here](#).

carsales.com Ltd

Sustainability Report 2022



## STAKEHOLDER ENGAGEMENT

Sustainability is about creating value in the long term by managing our risks and opportunities. We take our responsibilities to society seriously and ensure that we understand the varied interests and concerns of our key stakeholders including:

- Employees;
- Customers;
- Investors;
- Governing bodies; and
- Local communities.

## LOOKING AFTER OUR EMPLOYEES

Our employees are key to our sustainable operation, and we are proud to have achieved the following awards and recognitions in FY22:

- Great Place to Work® for the fifth consecutive year;
- Workplace Gender Equality Agency (WGEA) Employer of Choice for an eighth consecutive year- and becoming a certified Family Inclusive Workplace™;
- An Australian Association of Graduate Employers (AAGE) Top Graduate Employer; and
- A 6% uplift in overall employee engagement in our 2022 employee opinion survey.

# SUPPLY CHAIN OVERVIEW

carsales' major spending categories throughout FY22 included:

- **Technology** – such as software licences, hardware, cloud-based services and digital infrastructure;
- **Marketing** – such as events, sponsorships, advertising and merchandise;
- **Professional services** – such as consulting fees, specialist contractors and administrative support; and
- **Facilities** – office rent, capital improvements and support services (e.g. security, cleaning).
- **Tyres** – purchase of rubber-based tyres for supply to customers.
- **Travel** – airfares, accommodation, and transportation.

carsales carried out an initial supply chain review in FY20. This review identified and assessed the modern slavery risk of over 1,000 first tier suppliers across our Australian and international entities. Since conducting this review, approximately 250 suppliers have been onboarded as new suppliers to our Australian businesses, undergoing risk analysis as part of onboarding.

The process of identifying and mitigating modern slavery risks prior to engagement of any new supplier evidences carsales' intention to address and manage these issues from the outset. These onboarding processes are now well established in the Australian business and are in the process of being rolled out to our international entities.





# PART B – MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS



# IDENTIFYING RISKS IN OUR OPERATIONS

## OUR OPERATIONAL PROFILE

As a predominantly online services business, our modern slavery risk profile is lower than many similar sized businesses in other sectors.

## NEW MODERN SLAVERY RISKS THROUGH THE ACQUISITION OF TYRECONNECT

In FY22 we acquired TyreConnect, a business-to-business tyre distributor which services leading automotive dealership brands. Its supply network includes tyre manufacturers and third-party wholesale distributors, with a footprint throughout Australia. TyreConnect's operations present the following modern slavery risks:

- **Contingent workforce:** TyreConnect's workforce is supplemented by short-term contractors and labour hire arrangements on an as-needed basis to support TyreConnect's warehouse operations.
- **Supply chain risk:** Tyres have been identified as a high-risk product due to the typical locations and methods of manufacture. As such, the acquisition of the TyreConnect business has increased carsales' exposure to risks of modern slavery. These risks are being managed by closer attention to supply chain management in this business.

## CASE STUDY #1:

- TyreConnect sought to engage a labour hire firm to deal with fluctuating labour requirements at its warehouse.
- TyreConnect rejected two initial labour hire companies on the basis that they would not sufficiently accept changes to their terms and conditions, including the addition of modern slavery assurances.
- TyreConnect ultimately chose a more expensive supplier that did provide modern slavery assurances and is controlled by a modern slavery reporting entity.
- This demonstrates that carsales' businesses will accept a financial penalty to ensure that its suppliers have reasonable modern slavery risk safeguards in place.

# SPECIFIC RISKS - PRODUCT, SERVICE AND SECTOR

Prospective suppliers are asked to provide information about the types of products and services they will be providing and the sectors in which they operate. Suppliers operating in the electronics, automotive, agricultural, mining/minerals, raw materials, garments, textiles, shipping, transport or construction sectors are considered to present a higher sector risk. Additionally, we have identified the following products and services that are relevant to our businesses and present a heightened modern slavery risk:

## TYRES

Our controlled entities Tyresales Pty Ltd and TyreConnect Pty Ltd provide tyre-related services. Whilst neither company manufactures tyres, the supply of rubber-based tyres is central to both companies' operations.

## MERCHANDISE

As a leading consumer brand, we purchase promotional t-shirts and other apparel from time to time. Apparel and clothing accessories manufactured overseas continue to present an elevated modern slavery risk.

## LABOUR HIRE

With the ongoing shortage of skilled workers, our business has become more reliant upon external labour resources (including those based overseas).

## FACILITIES

To support the operations of our offices and facilities, we rely on support services including cleaning, hospitality, security, maintenance and construction. These industries have been identified by the Australian Human Rights Commission as presenting a higher risk of modern slavery.

## TECHNOLOGY

We use a range of businesses for the supply of computers, mobile devices and other hardware. The supply of imported laptops, computers and mobile phones presents a heightened modern slavery risk.

Identifying these areas of increased risk has allowed carsales to allocate additional resources to manage risk in these areas.



# ADDITIONAL SUPPLY CHAIN RISKS



## GEOGRAPHIC RISK

In FY22, carsales improved its approach to screening geographic risks associated with supplier location.

The 2018 Global Slavery Index measures the extent of modern slavery country by country, and the steps governments are taking to respond to this issue, by appointing a numerical rating for each country.

carsales has adopted the 2018 Global Slavery Index ratings and divided countries into four risk categories within its supplier questionnaire. Suppliers are now required to select the category which includes their country of origin. This allows carsales to appropriately assess and manage any geographic risks posed by the supplier in a quick and expedient manner.

PART C –  
ACTIONS TAKEN  
TO ASSESS AND  
ADDRESS RISKS



# EVALUATING SUPPLY CHAIN RISKS

## BROADER RISK ASSESSMENT OF SUPPLIERS

Our prospective suppliers are asked a range of questions to understand the extent to which they manage modern slavery risks, including whether they:

- have filed a Modern Slavery Statement under the *Modern Slavery Act 2018* or comparable international law;
- are aware of any historical incidents of modern slavery in their supply chains (and if so, the nature of such incidents);
- have implemented policies and procedures to manage modern slavery risks (and if so, provide details about such policies and procedures);
- provide training to employees about modern slavery;
- conduct audits of their operations and suppliers in relation to modern slavery risks; and
- require their suppliers to certify that materials incorporated into their final product were sourced, processed and manufactured in compliance with applicable laws.



# EVALUATING SUPPLY CHAIN RISKS:

## GEOGRAPHIC RISK



### NEW SUPPLIERS FY22

In FY22, our Australian operations onboarded approximately 120 new suppliers. These new suppliers (and their suppliers) were overwhelmingly based in Australia or other countries identified as being at lower geographic risk of modern slavery as outlined in the *Global Slavery Index 2018*.

carsales asked these suppliers to accept the following obligations in their terms of engagement:

- to keep sufficient records to enable carsales to verify the source of goods and/or services provided;
- to provide carsales with access to those records in order to comply with modern slavery laws, upon request; and
- to report any actual or suspected instances of modern slavery within its supply chains to carsales.

Where a new carsales supplier is determined to be high-risk (i.e. the supplier was based in a country that received a high-risk rating in the *Global Slavery Index 2018*), carsales made further enquiries in relation to that supplier's operations and sought to incorporate tighter reporting obligations in its contract (in addition to the general record keeping and reporting obligations listed above) including:

- to conduct awareness and compliance training with its employees, subcontractors and suppliers in relation to modern slavery laws;
- to make reasonable endeavours to integrate training on modern slavery laws into any induction program for new employees, subcontractors and suppliers; and
- to comply with all reasonable instructions provided by carsales in relation to modern slavery laws (in addition to the general requirement that the supplier comply with all relevant laws).

# EVALUATING SUPPLY CHAIN RISKS:

## LEARNING MORE ABOUT OUR SUPPLIERS

### SUPPLIER SCREENING PROCESS

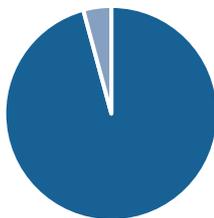
Our online supplier questionnaire tool provides insight into our suppliers, facilitates risk assessment, and helps us make informed decisions.

The data on this page reflects the suppliers which responded to our online supplier questionnaire tool in FY22.

These responses came from a wide range of suppliers to carsales' Australian business, from sole traders to multi-national corporations.

We are currently rolling out a similar supplier questionnaire across our international subsidiaries and hope to provide insights into their supplier responses in our FY23 report.

### DOES THE SUPPLIER AGREE TO COMPLY WITH OUR SUPPLIER CODE OF CONDUCT?

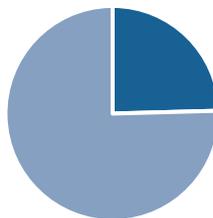


■ Yes ■ No

**95%** of suppliers agreed to comply with our [Supplier Code of Conduct](#).

Where a supplier did not agree to comply, this was typically due to the supplier having its own code of conduct that was comparable to carsales' Code of Conduct.

### DOES THE SUPPLIER HAVE POLICIES IN PLACE TO ADDRESS THE RISKS OF MODERN SLAVERY?

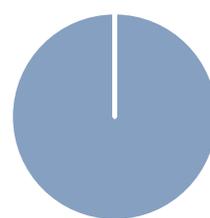


■ Yes ■ No

This question was asked only of those suppliers who had not submitted a Modern Slavery Statement under the Modern Slavery Act 2018 (Cth) (or equivalent foreign law) in the previous reporting period.

**24%** of non-reporting suppliers told us that they had policies in place to address the risks of modern slavery. The total proportion of carsales' suppliers with modern slavery policies would be higher if reporting entities were included.

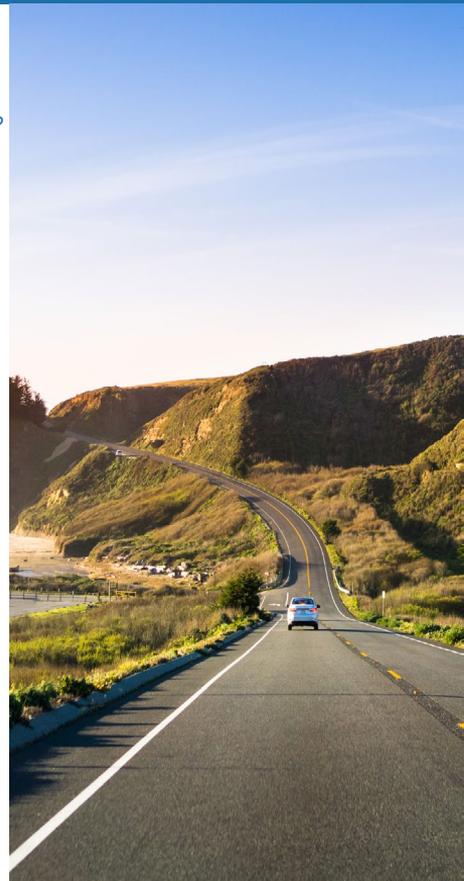
### HAS THE SUPPLIER HAD ANY KNOWN OR SUSPECTED INSTANCES OF MODERN SLAVERY IN ITS SUPPLY CHAINS?



■ Yes ■ No

**0%** of suppliers reported that they were aware of any known or suspected instances of modern slavery in their supply chains.

If a prospective supplier did identify a previous instance of modern slavery, our Modern Slavery Working Group would seek more information about the nature of the issue, the steps taken by the supplier to address the issue, and how the risks of future issues are mitigated.



# MANAGING SUPPLY CHAIN RISKS

## CONTRACTUAL CONTROLS

Where possible, carsales imposes the following contractual requirements on its suppliers:



### NOTIFICATION

To notify us of any actual or suspected instances of modern slavery in their supply chains.



### RECORD KEEPING

To keep sufficient records to enable carsales to verify the source of any goods or services supplied.



### AUDIT

To provide us with access to their records and premises relevant to modern slavery.



### MITIGATION

In FY23, we will seek to impose an obligation on our suppliers to take reasonable steps to mitigate modern slavery risks. This will encourage suppliers to be proactive in managing modern slavery risks.

## COMPLIANCE WITH CODE OF CONDUCT

We seek a commitment from suppliers to comply with our Supplier Code of Conduct (available [here](#)). The Code of Conduct sets out expected standards and behaviours – including respect for human rights and absence of modern slavery in the suppliers' own supply chains.

## TERMINATING SUPPLIER CONTRACTS

carsales prefers to engage constructively with our suppliers about modern slavery risks. However, where a supplier fails to adequately engage, or inadequately addresses a modern slavery incident, we may suspend or terminate our relationship with that supplier. Our standard contract terms allow for this action.

## ENGAGING WITH SUPPLIERS

Our engagement with suppliers includes:

- evaluating the supplier's existing arrangements to mitigate modern slavery risks (e.g. reviewing their Modern Slavery Statements, policies or procedures);
- advising suppliers about the importance carsales places on mitigating modern slavery risks;
- offering to provide training or explanatory materials to the supplier, which includes our new Modern Slavery Training Booklet; and
- working co-operatively to develop strategies to mitigate the risk of modern slavery.

# MODERN SLAVERY AWARENESS TRAINING

carsales monitors its current processes regularly to understand which areas require improvement.

Upon a review of the responses received from our supplier onboarding questionnaire in FY21, carsales identified some suppliers who had limited knowledge of the issues around modern slavery and no practices in place to address these issues.

carsales acknowledges that in order to effectively manage its modern slavery risks, it must be proactive in minimising the potential risks within its supply chains and the supply chains of its suppliers.

As a result, carsales created a [Modern Slavery Training Booklet](#) in FY22 which is now sent to suppliers that carsales has identified as 'high-risk'.

The initial feedback from suppliers regarding the Modern Slavery Training Booklet has been extremely positive.

In FY23, carsales will be seeking to implement a formal process and criteria for the completion of the Modern Slavery Training Booklet by its suppliers.



# WORKING WITH OUR SUPPLIERS



## CASE STUDY #2

In FY22, carsales engaged a supplier to provide event management and catering services.

Catering and similar businesses have been identified by carsales as high-risk services due to use of low-skill and low-wage workers.

The supplier in question completed carsales' supplier onboarding questionnaire and the responses indicated that it did not have sound knowledge of applicable modern slavery laws or the issues and risks surrounding modern slavery.

The supplier successfully completed the Modern Slavery Training Booklet and has now commenced its own investigation into modern slavery risks within its supply chain. It has advised carsales that it will implement its own policy and procedures addressing this issue.

# WORKING WITH OUR SUPPLIERS



## CASE STUDY #3

Tyres have been identified to be a high-risk product within our business. This is because the rubber required to produce the tyres is primarily sourced from Southeast Asia and is currently low in supply and high in demand. Such market conditions incentivise suppliers to take short cuts and raise social, environmental and economic risks- including relating to modern slavery.

Two of carsales' controlled entities, Tyresales Pty Ltd and TyreConnect Pty Ltd, rely upon the supply of rubber tyres. carsales carefully reviewed the supplier questionnaire responses for Tyresales Pty Ltd and TyreConnect Pty Ltd and identified two suppliers that did not have a sound understanding of modern slavery issues or appropriate controls in place to manage modern slavery risks within their organisations.

The Modern Slavery Training Booklet was completed by both suppliers who have since confirmed that:

- the Modern Slavery Training Booklet improved each company's knowledge about modern slavery issues; and
- each company would now take additional steps to manage modern slavery risks as a result of receiving the Modern Slavery Training Booklet.

# WORKING WITH OUR SUPPLIERS

The case studies contained in this statement demonstrate that:

1. carsales takes proactive steps to identify high risk suppliers within its supply chain.
2. carsales works collaboratively with suppliers to minimise risks of modern slavery within its supply chains.
3. Real and meaningful change occurs as a result of collaboration between carsales and its suppliers.



# PROCUREMENT FRAMEWORK

In FY22, a new Procurement Framework was rolled out across carsales' Australian operations. Key features include:

## (1) HOLISTIC ASSESSMENT OF SUPPLIERS

Suppliers must be assessed for their overall value which includes:

- modern slavery risk factors and the supplier's mitigation strategies;
- the supplier's willingness to accept and comply with our Supplier Code of Conduct; and
- the supplier's reputation, any previous modern slavery incidents and willingness to comply with all applicable laws.

## (2) EMBEDDING RISK MANAGEMENT PROCESSES

Changes to our procurement processes in FY22 include:

- making approval of Purchase Orders conditional upon completing modern slavery risk processes; and
- automating requests for all new suppliers to complete a supplier questionnaire.

Procurement for our Australian entities is managed by our Australian-based legal and finance teams working together with relevant business units. The legal team receives an automated warning when a "high risk" response is received to a supplier questionnaire.

Our international entities manage their own procurement and the Modern Slavery Working Group continues to work closely with them to enhance processes internationally.





# PART D – ASSESSING OUR EFFECTIVENESS



# ASSESSING EFFECTIVENESS AGAINST FY21 GOALS

FY21 goal	Our actions in FY22	Self-assessment
Integrate new acquisitions	In FY21, we acquired a number of new businesses in Australia. In FY22, we aligned these new entities with our standard procurement and modern slavery risk mitigation processes. A review of existing suppliers was conducted and high-risk suppliers were identified. These high-risk suppliers were asked to complete supplier onboarding questionnaires.	Fully achieved
Leverage our experience internationally	We have continued to engage with our controlled entities overseas, including by implementing new procedures to better engage with their suppliers. Our subsidiaries based in Mexico and several in Asia have already implemented a similar supplier onboarding questionnaire process as is followed in Australia. We have developed a supplier onboarding questionnaire process for our Korean based entity in FY22 which we will seek to roll out in FY23. We will continue to work with subsidiaries in other locations to develop processes which respect their operational and cultural contexts.	Significant achievement and ongoing
Increase visibility beyond the first tier of our supply chain	We enhanced our understanding of the depths of our supply chains by collecting second tier data around geographic risk of suppliers i.e. whether our suppliers' own suppliers are in high risk locations. These risks are now mapped in accordance with the Global Slavery Index 2018.	Significant achievement and ongoing
Refine our screening tools	The online questionnaire and automated screening tool developed in FY21 was enhanced in FY22 to enable us to collect more granular data about geographic risk by categorising a supplier's country of origin into four categories based on the Global Slavery Index 2018. Following feedback from larger suppliers, our screening tools were streamlined to ensure each supplier was asked appropriate questions following their initial response. For example, where a supplier has submitted a modern slavery statement in the previous reporting period, the supplier is not required to provide additional information regarding its products, services and policies and this information is accessed instead from its statement.	Fully achieved
Continue to engage with our suppliers and enhance our training program	In FY22, we developed the Modern Slavery Training Booklet in an effort to educate high-risk suppliers and spread awareness. The feedback from the Modern Slavery Training Booklet has been positive and some suppliers have confirmed that they will take steps to implement their own policies and procedures to address this issue.	Significant achievement and ongoing

# PART E - CONSULTATION



# CONSULTATION

This statement was prepared in consultation with our Australian and international controlled entities, and the following stakeholders:

- carsales.com Ltd's Board and its Risk Management Committee;
- relevant executive and senior leadership team members of controlled entities in Australia and overseas;
- relevant procurement personnel of controlled entities; and
- our Modern Slavery Working Group.



# PART F - OTHER



# GOALS FOR FY23



## 1. CONTINUE TO INTEGRATE NEW ACQUISITIONS

We will review and, where necessary, implement modern slavery processes for newly acquired businesses to reflect the approach of the broader carsales group. This will include Trader Interactive, a US entity acquired at the beginning of FY23.

## 2. ENHANCE OUR TRAINING PROGRAM INTERNALLY

In FY23, modern slavery awareness training will be made available to all employees in Australia. We will also deliver new training about our Procurement Framework to those internally that are involved in procurement.

## 3. ENHANCE OUR TRAINING PROGRAM EXTERNALLY

We will continue to provide support and guidance to our suppliers by making our Modern Slavery Training Booklet accessible online. We will also establish a formal policy requiring completion of the Modern Slavery Training Booklet for suppliers that fall within set criteria (e.g. those assessed as having a high modern slavery risk rating based on geographical location or industry).

## 4. DEVELOP POLICY REGARDING NON-COMPLIANT SUPPLIERS

We will develop a consistent policy for suppliers that may unreasonably refuse to complete our supplier onboarding questionnaire or that cannot provide any modern slavery assurances or commitment to training. This may involve a policy of non-engagement or termination at the next contractual opportunity with limited exceptions (for example where there is no reasonable alternative supplier).

## 5. CONTINUE TO ENGAGE WITH OUR SUPPLIERS

We will continue to engage with our suppliers around the world in FY23 to improve modern slavery risk controls. This engagement may include educating smaller suppliers about the concept of modern slavery, reviewing the existing modern slavery arrangements of larger suppliers, or asking our suppliers to engage with their own supply chains.