

Modern Slavery Statement 2023

This Statement is published in accordance with the Modern Slavery Act 2018 (Cth) (**Act**) and outlines the steps Inchcape Australia Limited and its group companies has taken to assess and address the risk of modern slavery in our business and supply chains during the financial year ending 31 December 2023. This is our fourth Modern Slavery statement under the Act.

A. The reporting entities

As with our previous Modern Slavery statements, this is a single joint Statement and covers the following group entities:

- Inchcape Australia Limited (**IAL**);
 - Subaru (Aust) Pty Ltd (**Subaru Australia**);
 - Inchcape European Automotive Pty Ltd (**Peugeot Citroen Australia**);
 - Trivett Automotive Retail Pty Ltd (**Trivett**);
 - AutoNexus Pty Ltd (**ANX**); and
 - Partslane Pty Ltd (**PartsLane**).
- (collectively, **Inchcape Australia**)

B. Structure, operations and supply chains

Our structure, operations, and supply chains have not materially changed in the last few years, other than the addition of PartsLane in 2023. IAL is ultimately owned by Inchcape plc, a company domiciled in the United Kingdom and listed on the London Stock Exchange. IAL is the Australian parent of the Inchcape Australia group companies Subaru Australia, Peugeot Citroen Australia, Trivett, ANX and PartsLane.

Inchcape Australia is a leading player in the automotive services sector operating in the distribution, retail and logistics markets.

The Inchcape Australia group operates the following businesses, with the following supply chain requirements:



| Main operations | Supply chain requirements |
|--|--|
| IAL supports five businesses through 7 shared services functions, being: <ul style="list-style-type: none"> - Finance - Human Resources - Information Systems - Legal & Company Secretariat - Procurement | IAL mainly purchases goods and services in the following categories: <p>Facilities management - security, cleaning, office supplies, postage and couriers, waste management, catering, fire protection and furniture.</p> <p>Finance, company secretarial & legal services - insurance, professional company secretarial, legal and financial support.</p> |

| | |
|--|--|
| <ul style="list-style-type: none"> - Marketing & PR - Property | <p>Human Resources - recruitment, training, employee and payroll services</p> <p>Information Technology - hardware, software, telecommunications and network services.</p> <p>Marketing and PR - advertising, media, creative services, print, public relations and marketing services.</p> <p>Operations - call centres, freight, health and safety, workshop parts and consumables, warehousing and logistics.</p> <p>Property - rent, signage, access goods and services, utilities, local authority payments and building services.</p> <p>Travel and Events - travel management, local & international transport, accommodation, parking, employee and customer events.</p> |
|--|--|



SUBARU

Confidence in Motion

| Main operations | Supply chain requirements |
|--|--|
| Subaru Australia is the exclusive Australian importer and distributor of new vehicles manufactured by Subaru Corporation of Japan. | Subaru Australia mainly purchase vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies. |



| Main operations | Supply chain requirements |
|--|---|
| Peugeot Citroen Australia is the exclusive Australian importer and distributor of new Peugeot & Citroen vehicles manufactured by Groupe PSA of France. | Peugeot Citroen Australia mainly acquires vehicles, vehicle parts, freight services and professional services from organisations such as creative agencies. |



| Main operations | Supply chain requirements |
|---|--|
| Trivett operates an automotive retail business selling, servicing and financing new and used vehicles, with dealerships located in New South Wales, Victoria and Queensland. Some used motor vehicle dealerships are operated under the brand name 'Bravoauto'. | Trivett mainly acquires the following goods and services: Operations - vehicle cleaning, service, maintenance and repairs, vehicle logistics, workshop parts, consumables and customers gifts Facilities Management - cleaning Marketing and PR - creative services, digital advertising and hosting services, local print and radio media |

| | |
|--|---|
| | <p>Vehicles and Vehicle Parts – new vehicles from its OEM or Distributor partners, including Subaru, Peugeot Citroen Australia, Mitsubishi Australia, Isuzu Ute Australia, Volkswagen Group Australia, FCA Australia and Kia Australia parts, MRO & workshop consumables.</p> <p>Used Vehicles – used vehicles are acquired from the owners of used motor vehicles.</p> |
|--|---|



| Main operations | Supply chain requirements |
|---|--|
| <p>ANX is a leading national operator in the automotive services industry providing fleet conversions, fleet refurbishment and maintenance, vehicle logistics, parts & vehicle warehousing and distribution, and inventory management services.</p> | <p>ANX mainly acquires goods and services in the following areas:</p> <p>Finance and Legal - insurance</p> <p>Human Resources - temporary and contingent labour</p> <p>Operations - freight, distribution and packaging materials, MRO consumables and services.</p> <p>Property - property management rent and utilities.</p> |



| Main operations | Supply chain requirements |
|--|--|
| <p>PartsLane operates an Automotive Genuine Parts E-commerce platform in Australia, including warehousing and distribution, and inventory management services.</p> | <p>PartsLane mainly acquires goods and services in the following areas:</p> <p>Finance and Legal - insurance</p> <p>Human Resources - temporary and contingent labour</p> <p>Operations - freight, distribution and packaging materials, MRO consumables and services.</p> <p>Property - property management rent and utilities.</p> |

C. The risks of modern slavery practices in Inchcape’s operations and supply chains

In the 2023 reporting period, Inchcape Australia sought to better understand the inherent modern slavery risks in its operations and supply chains and, in doing so, conducted a detailed review of potential risks and evaluated its engagement with suppliers.

Every business entity within Inchcape Australia operates to a centralised governance framework. For all business entities located in Australia, Inchcape Australia is required to comply with all Australian industrial relations laws.

Inchcape Australia obtained an independent preliminary risk analysis report as a key instrument for understanding the inherent risks within the business operations. The report concluded that the ability to effect significant change is more attainable with suppliers in which Inchcape Australia directly purchases goods and services from.

As illustrated in Figure 1 below, the report identified the majority of Inchcape Australia’s spend (Level 1 Commodities) and found that most Level 1 commodities pose low to moderate risk. This is primarily because 82% of the supply chain spend originates from Japan, where the national level of modern slavery risk is low (as per the Global Slavery Index).

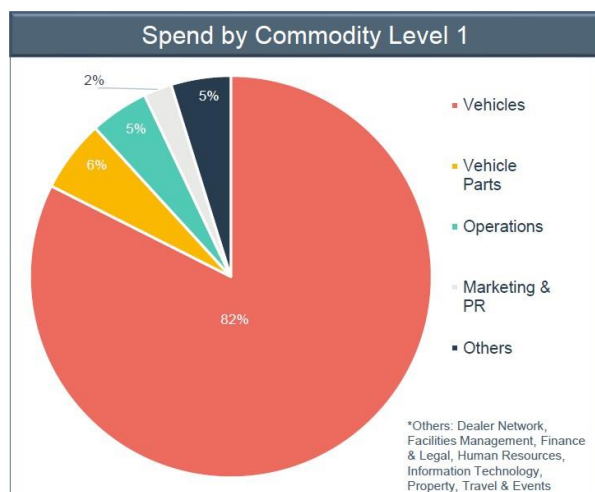


Figure 1 Spend by Commodity – Inchcape Australia

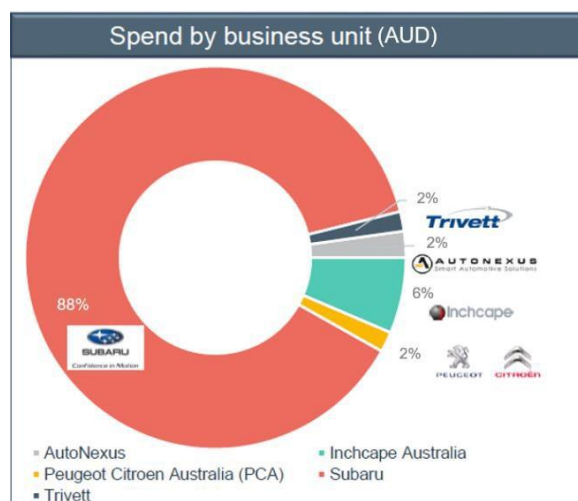


Figure 2 Spend by Business Unit (AUD)

Risks identified in the report were reviewed against the Global Slavery Index, which provides country and industry rankings developed by the Walk Free Foundation, the International Labour Organisation (ILO), and the International Organisation for Migration. The Risks related to the Global Slavery Index are assessed based on four standards:

- Social, Health and Economic Rights;
- Civil and Political Protections;
- Personal Security; and
- Refugees and Conflict.

In addition, risks identified in the report were tracked against The Dow Jones Sustainability Index:

- Industry Specific Criteria;
- Human Capital Development;
- Labour Practice Indicators;
- Corporate Citizenship; and
- Social Reporting.

As shown in Figure 2 above, Subaru Australia represents **88%** of the total spend across all business units. In Figure 3 below, within Subaru Australia, **94%** of its total expenditure is allocated to the purchase of new Subaru vehicles from the manufacturer. Furthermore, **82%** of the total spend originates from the Level 1 Commodities in the “Vehicles” category (refer to Figure 1).

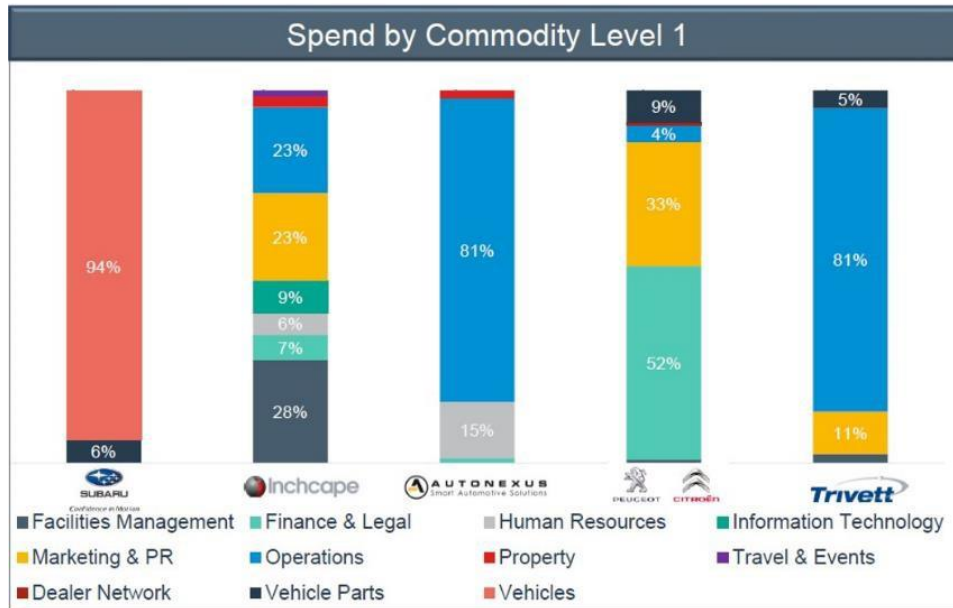


Figure 3 Spend by Commodity Level 1 - Business Unit

Overall, in 2023 Inchcape Australia’s view remained that the inherent risk of modern slavery in its operations and supply chain is low as most of the goods and services Inchcape Australia purchases continue to be from countries where the prevalence of modern slavery is considered to be quite low. As previously reported, products purchased from higher risk countries only account for approximately 1% of the products Inchcape Australia acquires.

D. Actions taken to assess and address modern slavery risk

1. Conducting due diligence of our suppliers through online due diligence software platform.

Inchcape Australia has reviewed and assessed supplier compliance management platforms and is currently in the process of selecting a suitable platform for implementation.

A primary objective of this platform will be to enable suppliers to demonstrate their adherence to modern slavery regulations. Additionally, the platform will track suppliers' compliance with modern slavery and code of conduct standards, and will store essential supplier and contractor information, including health and safety documents and policies related to their commitment to and acknowledgment of Inchcape’s Code of Conduct for Suppliers.

2. Code of Conduct for Suppliers.

Inchcape Australia has conducted a comprehensive review of our Code of Conduct for Suppliers policy to ensure it aligns with our elevated expectations and the higher global awareness of modern slavery issues.

For new suppliers to Inchcape Australia, there is a supplier onboarding process where all suppliers are required to acknowledge the Inchcape Code of Conduct for Suppliers prior to any purchase orders being created through the digital ERP platform.

Our Code of Conduct policy is guided by international standards and guidelines. It has six key expectations that Inchcape Australia's suppliers acknowledge:

- **Human Rights and Labour Standard:** Suppliers acknowledge that they ensure and protect against practices of modern slavery in the form of forced labour and that necessary steps have been taken to identify risk of modern slavery.
- **Business integrity:** Requirement for all suppliers to comply with applicable laws in the market which they operate.
- **Freedom of Assembly:** Suppliers are to acknowledge workers have the freedom to choose employment, and to respect the laws regarding freedom to form interest groups.
- **Whistle-blower Policy:** Process and protections afforded to suppliers or any employees of Inchcape Australia, to raise concerns that they may have about suspected wrongdoing within the organisation.
- **Safety in Working Environment:** Suppliers should seek to avert dangers to employees by means of preventative occupational safety measures.
- **Environmental Protection:** Suppliers comply with applicable environmental standards and commit to principles of sustainable management as part of their corporate value.

E. Assessing the effectiveness of Inchcape's actions

Inchcape Australia continued its journey on modern slavery due diligence during the 2023 reporting period and will continue to review and assess the effectiveness of actions taken to address modern slavery, to determine whether they are effective or require further refinement or improvement.

The following steps were undertaken in assessing the effectiveness of our actions in the 2023 reporting period:

- Inchcape Australia has reviewed and assessed supplier compliance management platforms and is currently in the process of selecting a suitable platform for implementation. This platform will allow Inchcape Australia to track the status of supplier compliance regarding modern slavery.
- The Inchcape Code of Conduct for Suppliers has been shared with suppliers with an open line of communication to contact regarding our approach.
- An established process to review the actions Inchcape Australia has taken in the 2023 reporting period, including a regular working group meeting to review Inchcape Australia's response to modern slavery.
- Through Inchcape Australia's Whistleblowing policy, no complaints were received regarding any potential modern slavery incidents.

We are continuing to monitor and improve our processes in relation to outcome and to further reduce the risk of modern slavery in our operations and supply chain network.

F. Consultation with Inchcape's entities

Inchcape Australia has a Modern Slavery Project Team that works across all business units and functional departments. The Modern Slavery Project Team consults with key staff members of each business unit as required and regularly meets to provide updates.

G. Other information

Inchcape Australia has no additional or other information to provide in respect of the reporting period of 2023.

Approval

This Modern Slavery Statement was approved by the Board on 28 June 2024.



Colin Christie
Managing Director
Inchcape Australia Limited