



Modern Slavery Statement

GRAYS GROUP

Reporting Period: financial year ending 30 June 2024

Approved by the Grays Group Board of Directors on 13 December 2024

1 Who we are

This modern slavery statement is made on behalf of Grays.com Pty Ltd (ABN 78 634 636 310) and it covers Grays.com Limited and each of its subsidiaries (the “**Grays Group**”).

2 About our structure, operations and supply chains

The Grays Group comprises businesses that connect sellers and buyers across various categories of commercial and consumer goods and assets, including industrial, automotive and liquor. This exchange takes place primarily through our online selling platform (known as “**Grays**”) by either auction or outright sale. In addition, the Grays Group provide sellers support relating to valuation, cataloguing, project management, marketing, WHS compliance and reporting.

The Grays Group and its related entities operate in Australia and focus on sales to consumers and businesses in Australia. The Grays Group currently employs approximately 336 employees (as at June 2024), all of whom work in Australia. The Grays team is supplemented by the employees of third-party service providers located in the Philippines, who provide call-centre and business intelligence services.

The Grays Group have operational sites in Sydney, Melbourne, Adelaide, Brisbane, Darwin and Perth, covering approximately 22,000sqm of warehouse space, 150,000sqm of yard space, as well as having access to other third-party sites across Australia.

The main focus of the business activities of the Grays Group is facilitation of the sale of goods and assets between a seller and a purchaser. In these circumstances, the Grays Group acts as agent for and on behalf of sellers on a consignment basis. Items are listed on the Grays website and sold to interested parties. The Grays Group collects a fee for facilitating the sale.

Grays Group procures the following in its business activities:

- Various goods and assets for auction or sale, which may include imported assets, which Grays sells on consignment for or on behalf of a seller.
- Transport and logistics services to transfer goods and assets: (i) from a seller’s site to a Grays Group Site, (ii) from a Grays Group site or a seller’s site to a buyer location, or (iii) between Grays Group Sites.
- Office supplies and stationery, staff uniforms, corporate merchandise, standard and heavy duty cleaning products and equipment, and packaging/labelling equipment.
- Equipment such as forklifts, tools and other miscellaneous items for the operation and administration of our sites.
- Assets and services that are ancillary to our core business and required for maintenance of our sites and



management of our workforce, including professional services.

- Labour hire services (on a limited basis).
- Offshore call-centre and business intelligence services from the Philippines.

3 The risks of Modern Slavery in our Supply Chains

Grays Group recognises that modern slavery is a complex, global problem that requires a collaborative commitment and we are committed to working with our stakeholders to eradicate this practice from our supply chains.

Grays Group has assessed its risks in respect of the potential to cause, contribute or be directly linked to modern slavery practices and considers that these risks are no greater than other businesses of comparable size and operations.

Grays Group has identified the following modern slavery risks with in its business and supply chains:

- A risk that we procure assets or services from suppliers who engage in modern slavery, either directly or indirectly. In this regard, we note that there is a higher risk in areas such as cleaning, security, offshore administration, transport and shipping.
- A risk that our suppliers directly or indirectly source their inputs from entities who engage in practices of modern slavery.
- A risk that there is modern slavery further down into the supply chains of our suppliers.

4 Our Response to Modern Slavery Risks

The Grays Group takes modern slavery risk seriously. We have taken the following steps to assess and mitigate the risks of modern slavery in our operation and associated supply chains:

- **Group-wide policy implementation:** We have published a “Modern Slavery and Ethical Sourcing Policy”, outlining our commitments, as well as related business and reporting procedures. The policy is available on the Grays Group’s website (“**Policy**”).
- **Minimum requirements for suppliers:** We seek the inclusion of our standard modern slavery clause in all supply agreements. Where suppliers have their own provisions, we review their terms to ensure they are satisfactory..
- **Agency Agreements:** Our Agency Agreements include a warranty from our suppliers that, to the best of their knowledge, the assets they auction or sell via Grays are not the product of modern slavery.
- **Reporting mechanisms:** We provide a mechanism for confidential and/or anonymous reporting through our “Whistleblower Policy”.
- **Raising awareness:** We raise awareness of our internally through internal communications channels.
- **Training:** Our employees are required to complete training on modern slavery and ethical sourcing each year.

Grays Group is continually improving its practices in relation to Modern Slavery. In the next 12 months, the Grays Group plans to:



- **Policy:** Review and update the Modern Slavery and Ethical Sourcing Policy and consider how to apply this policy in Gray's procurement practices.
- **Supply Chain:** Map our supply chain and conduct a more detailed analysis of the risk of modern slavery in our supply chain.
- **Supplier due diligence:** Develop a modern slavery questionnaire to begin engagement with suppliers.

Grays Group will also continue its internal awareness and training activities.

5 How we assess the effectiveness of our response

As at the date of this modern slavery statement, the Grays Group is not aware of any Modern Slavery occurring in its operations or supply chains. Grays Group continues to mature its approach to modern slavery and, in doing so, Grays seeks to implement policies, procedures and practices which are recognised as relevant and effective by the business community and by experts in this field.

6 Our consultation process in preparing this modern slavery statement

While there are a number of entities in the Grays Group, all of those entities are managed and overseen by a central Board and Executive Team. This means that a formal consultation process with the governing bodies of other entities is not required.

This Modern Slavery Statement was reviewed and approved by the Board of Directors of Grays.com Pty Ltd, and the Board has authorised Simon Pither, Chairman, to sign it.

A handwritten signature in black ink, appearing to be "SP", written in a cursive style.

Simon Pither
Director, Grays.com Pty Ltd
13 December 2024