

MODERN SLAVERY STATEMENT

PENSKE AUSTRALIA JOINT STATEMENT FOR FINANCIAL YEAR 2024



Australia & New Zealand



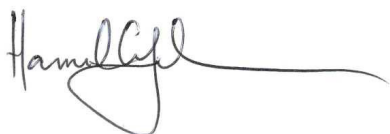
MANAGING DIRECTOR'S FOREWORD

At Penske we are committed to upholding human rights and creating, as well as sustaining, an environment where our employees, customers, and business partners are treated with respect, equality, and fairness. In recognition of this and in accordance with our obligations under the *Modern Slavery Act 2018* (Cth), Penske Transportation Group International Pty Ltd is pleased to be publishing its fifth Modern Slavery Statement.

Penske has a zero-tolerance approach to modern slavery and is consistently working to minimise and address any modern slavery risks within our operations and supply chain. Penske remains committed to identifying opportunities to refine our procedures and processes to improve visibility of modern slavery risks in our complex supply chain and work collaboratively with our customers, business partners and suppliers to eradicate modern slavery.

Penske supports the intent of the *UN Guiding Principles on Business and Human Rights* as well as related international conventions, treaties, and protocols. We are committed to protecting our organisation and workers from risks of modern slavery or human trafficking.

This Joint Modern Slavery Statement is approved by the Board of Penske Transportation Group International Pty Ltd ACN 164 850 355 on behalf of the reporting entities.

A handwritten signature in black ink, appearing to read 'Hamish Christie-Johnston', followed by a long horizontal flourish.

Hamish Christie-Johnston
Managing Director
June 2025

REPORTING ENTITY

This Modern Slavery Statement is made by Penske Transportation Group International Pty Ltd ACN 164 850 355 (PTGI) for the reporting period 1 January 2024 to 31 December 2024 for the purposes of the *Modern Slavery Act* (Cth) 2018 (Act).

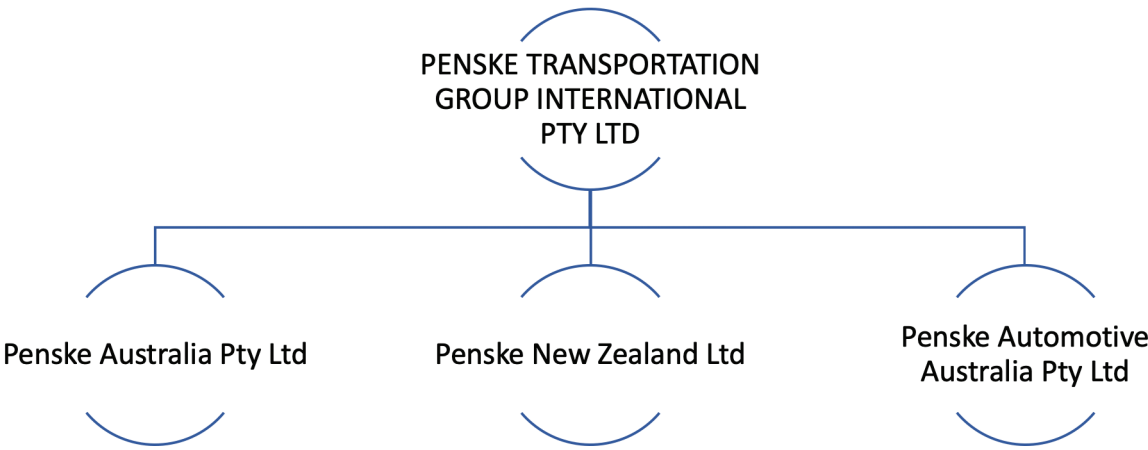
During the reporting period, PTGI’s operations expanded with the acquisition of two businesses by a newly established subsidiary of PTGI, Penske Automotive Australia Pty Ltd.

This statement covers the following entities (together referred to as Penske):

- Penske Transportation Group International Pty Ltd ACN 164 850 355
- Penske Australia Pty Ltd ACN 073 690 990
- Penske Automotive Australia Pty Ltd ACN 676 147 158
- Penske New Zealand NZBN 9429032261783

Penske Australia Pty Ltd (PAU) and Penske Automotive Australia Pty Ltd (PAA) operate within Australia. The Boards of PAU and PAA include two Directors of PTGI. The Penske entities are centrally governed and managed and have a common registered office at 72 Formation Street, Wacol, Queensland.

This statement refers to elements of the Penske New Zealand operations despite this entity not meeting the definition of “reporting entity” under the Act. The Australian entities and Penske New Zealand are subject to the same central governance structure and management as Penske Transportation Group International Pty Ltd.



REPORTING ENTITY'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Structure

Penske is wholly owned by international transportation services company, Penske Automotive Group, Inc. (NYSE: PAG), and operates independently to provide exceptional standards of service to its customers. Penske's primary operating subsidiaries in Australia are Penske Australia Pty Ltd and Penske Automotive Australia Pty Ltd, and in New Zealand is Penske New Zealand.

Penske Australia and Penske New Zealand

Operations

Penske Australia and Penske New Zealand supply heavy-duty trucks, diesel and gas engines, and energy systems across Australia and New Zealand. Its key brands are Western Star Trucks, MAN Truck & Bus, Dennis Eagle, MTU, Detroit, Allison Transmission, Bergen and Sauer Compressors. Penske Australia and Penske New Zealand also represent aftermarket products from leading oil, coolant, and filter brands.

Penske's customers operate in the Asia-Pacific region's most critical and dynamic markets, including:



On-highway



Rail



Marine



Construction and
Industrial



Power Generation



Off-highway



Defence



Oil and Gas



Mining

Commercial vehicles

Penske imports trucks in an assembled condition. Penske then certifies the vehicles to Australian standards and upfits or modifies the vehicles in-country to customer specifications. Modifications may include bullbars, guard systems, air conditioning, electrical upgrades, hydraulics, paint or fitting equipment manufactured by bodybuilders.

Buses are imported as a rolling chassis, which are sent to third-party body building production facilities for body building as part of the final assembly process.

Power systems

Penske's energy solutions business supplies generator sets as well as complete turnkey solutions from design, engineering and manufacturing through to installation, commissioning and aftersales support. Penske's equipment range includes diesel and gas gensets for continuous power, prime power, emergency standby power and mobile applications, cogeneration and trigeneration, as well as energy storage and control systems. Penske provides tailored solutions including small scale through to multi megawatt applications to suit unique customer requirements.

Penske operates two engine-remanufacturing centres located in Sydney and Perth, which service the specialist demands of our on-highway and off-highway customers. The only facilities of their type in the southern hemisphere, these bespoke, innovative engine remanufacturing centres conduct advanced research and engineering to produce the finest quality remanufactured engines and componentry.

Network

Penske’s Australian operations are headquartered in Wacol, Brisbane. Penske Australia operates 16 retail branches in capital cities and regional towns across Australia and a world-class parts distribution facility located in Wacol. Penske also operates a fleet of vehicles which provide mobile technical support to customers across the country. In New Zealand, Penske operates three state-of-the art dealerships in Auckland, Tauranga and Christchurch.

Penske’s customers are supported by its significant investments in its dealer networks across Australia and New Zealand, and Penske’s four regional training centres (including a dedicated facility in Glendenning, Sydney) which deliver factory-backed technical training. Penske’s dealer network comprises of Penske owned as well as independently owned and operated dealership businesses.

Penske Australia dealership businesses represent Western Star Trucks, MAN Truck & Bus and Dennis Eagle trucks, as well as Detroit engines at selected locations. The majority of the Penske dealerships provide full vehicle retail sales, maintenance and repair services, and parts supply. Only 2 of the dealerships provide vehicle parts and maintenance and repair services. All these locations also provide retail sales and servicing of Detroit engines.

Penske Automotive Australia

Operations

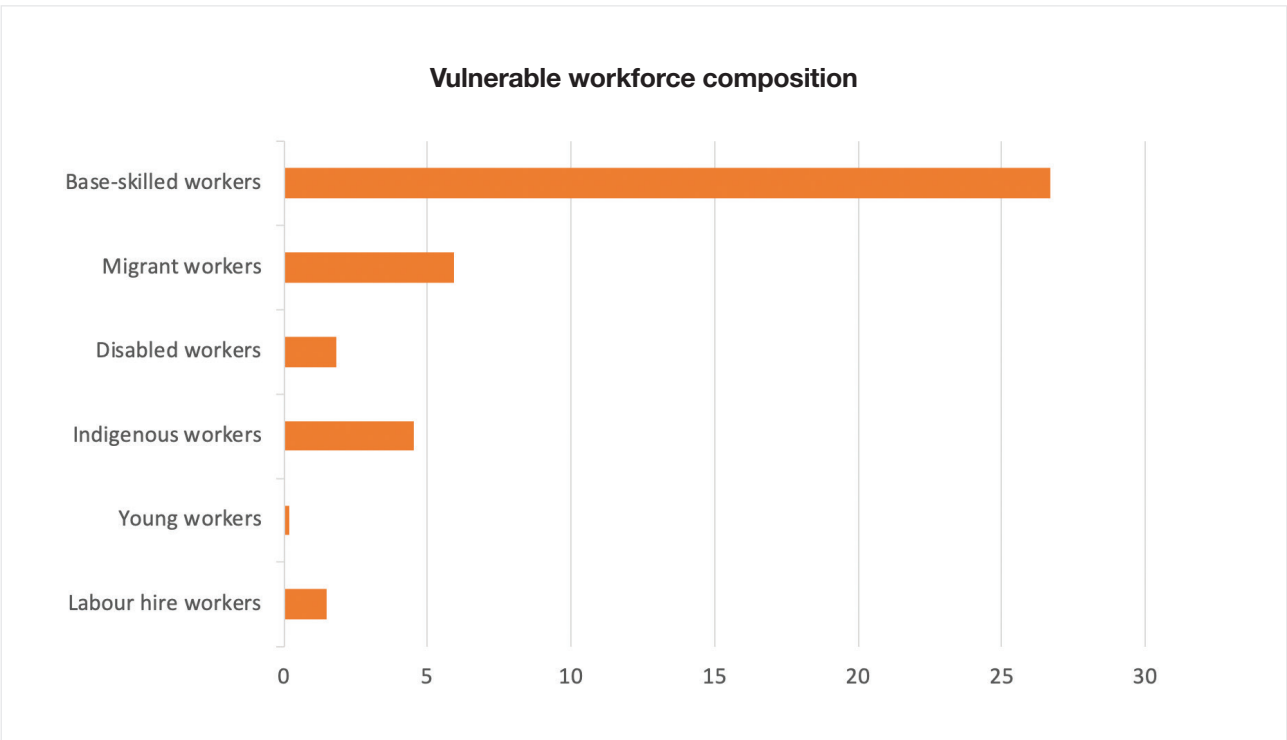
Penske Automotive Australia is a wholly owned subsidiary of PTGI. PAA undertakes sales and marketing activities for new and pre-owned Porsche sports cars, new automotive parts, and aftersales services. New Porsche cars and automotive parts are sourced from the Porsche distribution network. PAA also undertake various marketing activities and events to promote the Porsche products and services and the Porsche brand.

Penske Automotive also operates its own, independently-branded, premium used car dealership retailing used cars of various brands.

Total Workforce

As at 31 December 2024, Penske employed over 1,400 employees across Australia and New Zealand under employment contracts.

Penske employs vulnerable workers across the business in the following categories:



Supply chains

Penske sourced its products and services from various suppliers across the globe. The majority of those suppliers were based in Australia and New Zealand, followed by USA and Germany. A large proportion of its supply base comprises long standing and reputable suppliers who have worked with Penske to create supply chain synergies and stable partnerships. Penske procure products, parts and accessories to support their Original Equipment Manufacturer (OEM) distributed products, along with all of the products and services you would expect to see in a large-scale retail and distribution business.

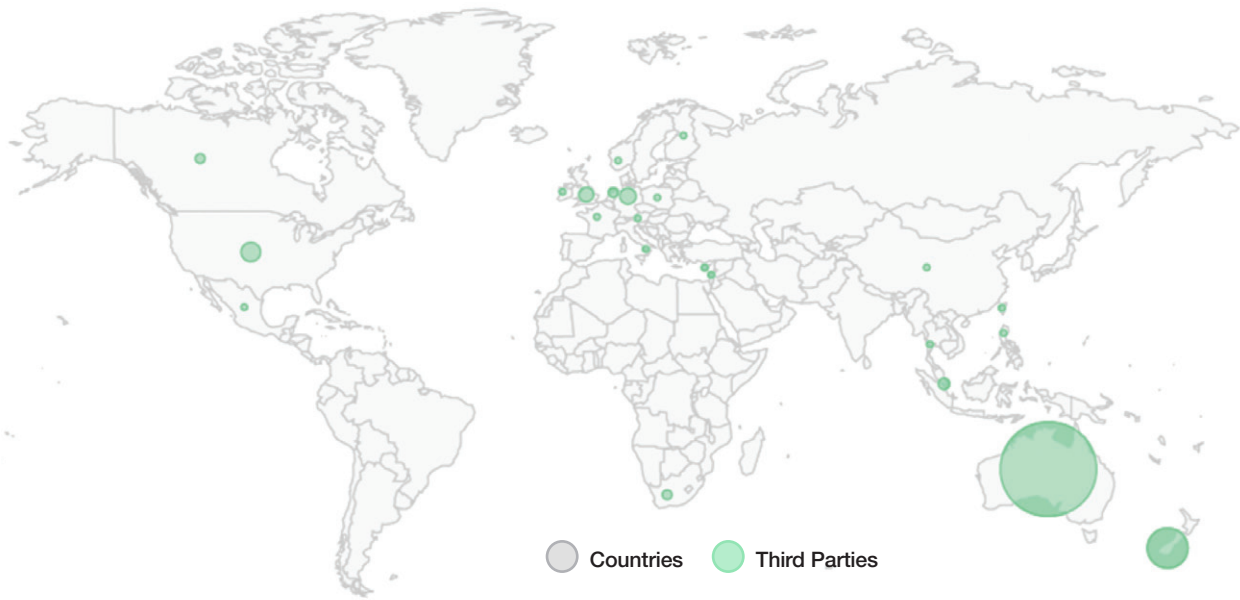


Fig 1: Geographical locations of suppliers which Penske procures products and services from

Most of Penske’s suppliers manufacture and/or purchase the goods and services they provide to Penske from Australia, however, there is a proportion of suppliers that manufacture and/or purchase components from across the globe:

Locations where Penske’s suppliers manufacture/produce goods and services

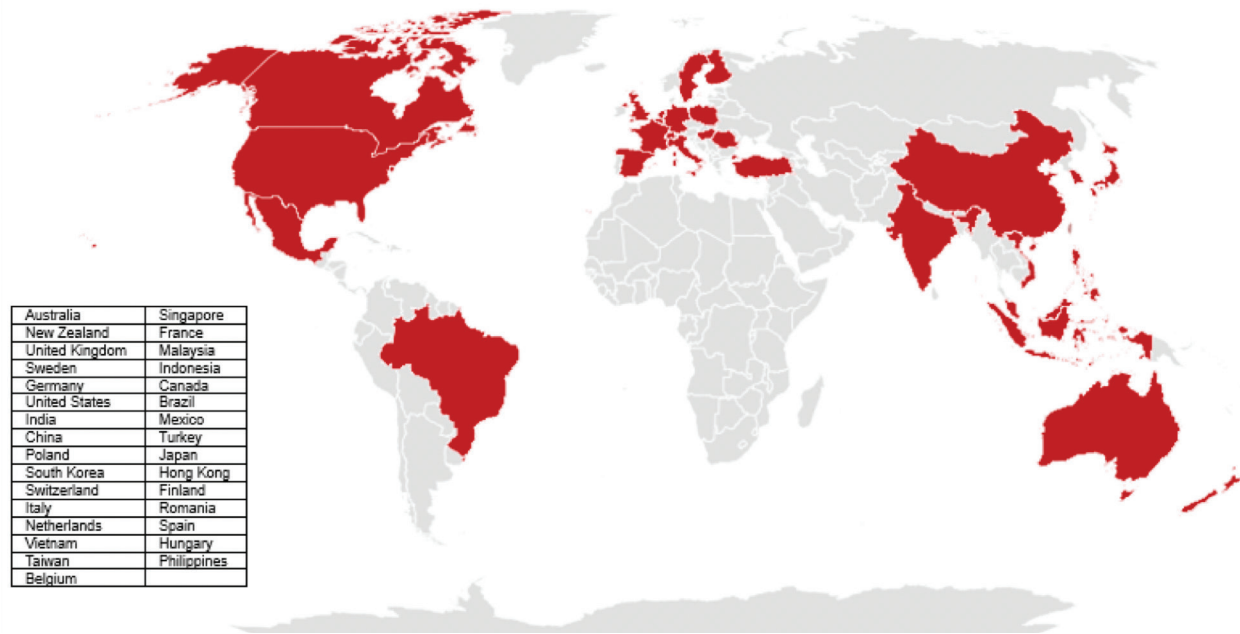


Fig 2: Geographical locations of where suppliers manufacture/produce goods and services

Penske Australia and New Zealand's operations are supported by a network of independent dealers located, as follows:

Country	Type	Number of dealers	Number of locations
Australia	Independent	54	75
NZ	Independent	17	25
Indonesia	Independent	1	1

Penske's business imports and distributes the following brands:

Brand	Product	Ownership	Headquarters	Manufacturing locations
Western Star Trucks	Trucks	Daimler Trucks North America LLC	Portland, Oregon, USA	USA
MAN Truck & Bus	Trucks and buses	MAN Truck and Bus SE	Munich, Germany	Germany; Poland; other parts of Europe depending on customer specifications
Dennis Eagle	Refuse collection trucks	Terberg RosRoca SA	Spain	United Kingdom
Porsche	Sports cars	Porsche AG	Stuttgart, Germany	Germany

Penske's off-highway business principally distributes engines, transmissions, energy storage and associated power equipment from the following global manufacturers:

Brand	Product	Ownership	Headquarters	Manufacturing locations
Allison Transmission	Automatic transmissions	Carlyle Group	Indianapolis, USA	USA; India
Bergen	Gas engines	Langley Holdings Plc	Bergen, Norway	Bergen, Norway
Detroit	Diesel engines	Daimler Truck Holding AG	Detroit, Michigan, USA	USA; Mexico
Donaldson	Air filters	Donaldson Company, Inc.	Bloomington, Minneapolis, USA	NSW Central Coast, Australia
MTU	Diesel and gas engines; battery storage systems; Kinetic UPS	Rolls-Royce Holdings	Friedrichshafen, Germany	Germany; Spain; USA
Rolls-Royce Power Solutions	Energy storage and control systems	Rolls-Royce Holdings	Berlin, Germany	Germany
Sauer Compressors	Compressors	JP Sauer & Sohn Maschinenbau GmbH	Kiel, Germany	Germany; France

Penske's ancillary activities include promotion of Daimler Truck Financial Services, Volkswagen Financial Services and other financial products through their retail locations. Finance is offered by third-party brokers which operate out of Penske's Brisbane, Sydney and Perth retail branches.

DESCRIPTION OF RISKS

Operations risk

To assess modern slavery risks within Penske's operations for the reporting year, the following factors were considered:

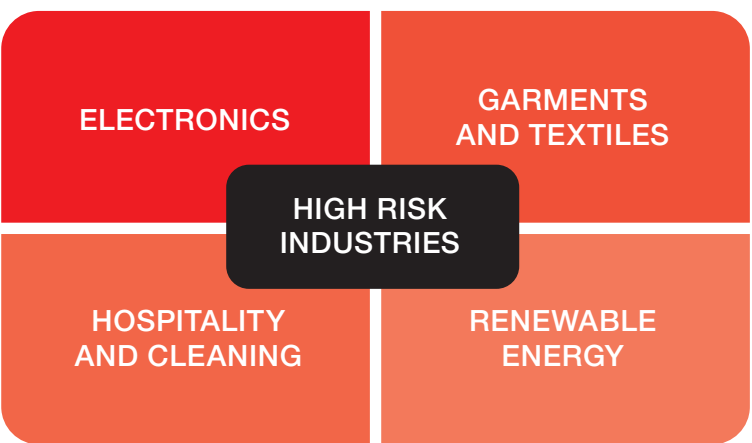
- the geographical locations of Penske's facilities
- the geographical locations of Penske's employees (including labour hire)
- Penske's operations
- the type of suppliers we engage

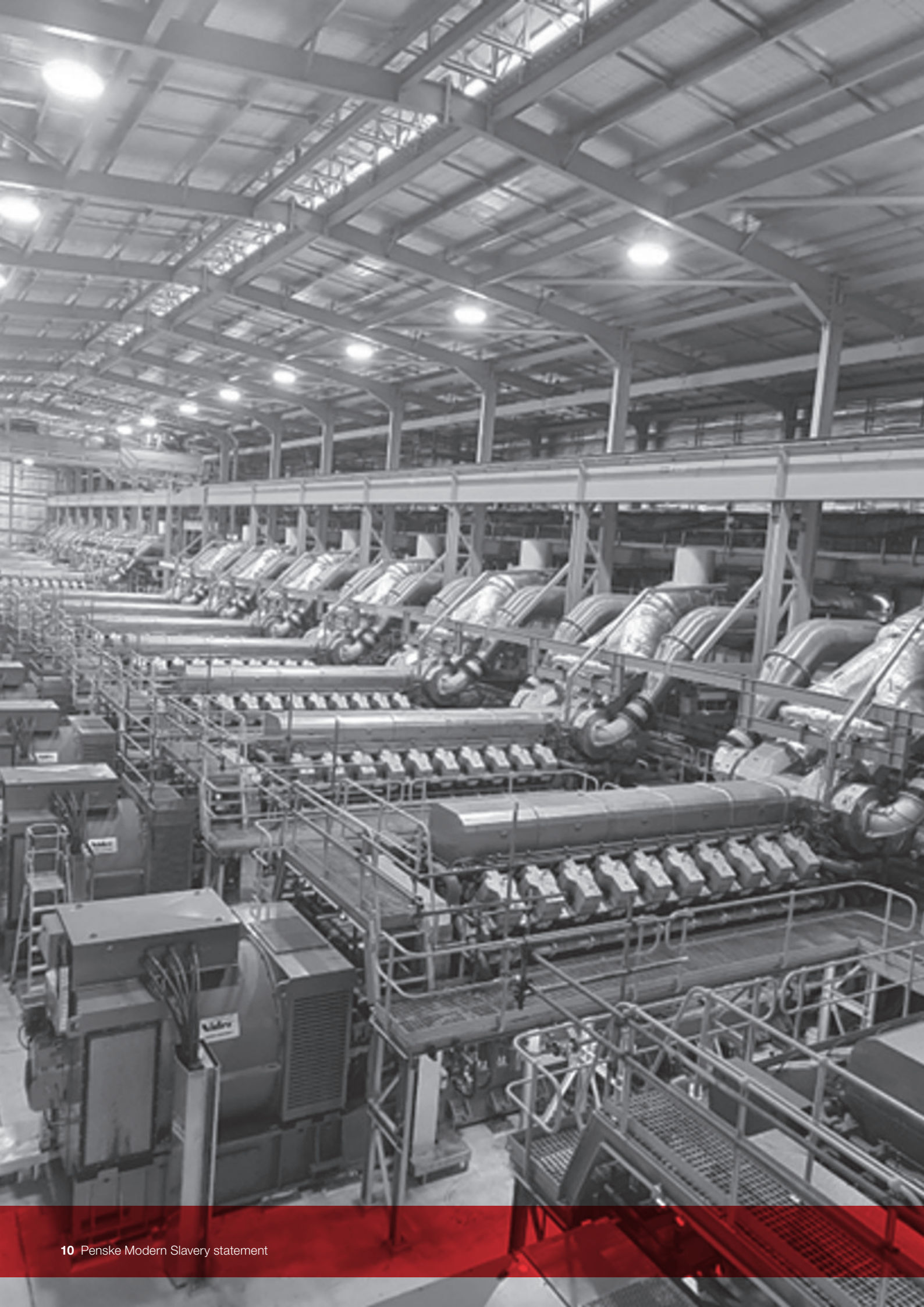
Supply chain risk

Penske undertook a risk assessment of its supply chain over the reporting period to understand how it may be causing, contributing or be directly linked to modern slavery practices. Penske's principal products and associated spare parts are sourced from reputable and long-standing OEMs with manufacturing facilities located in regions with low prevalence and vulnerability of modern slavery risks and with high governmental response to modern slavery practices.

The sectors from which Penske draws labour and goods are diverse and complex making supply chain visibility challenging. Penske acknowledges that certain industries carry a higher risk of modern slavery practices due to geographic risk associated with the locations where products and materials are sourced, and the supply chain models involved.

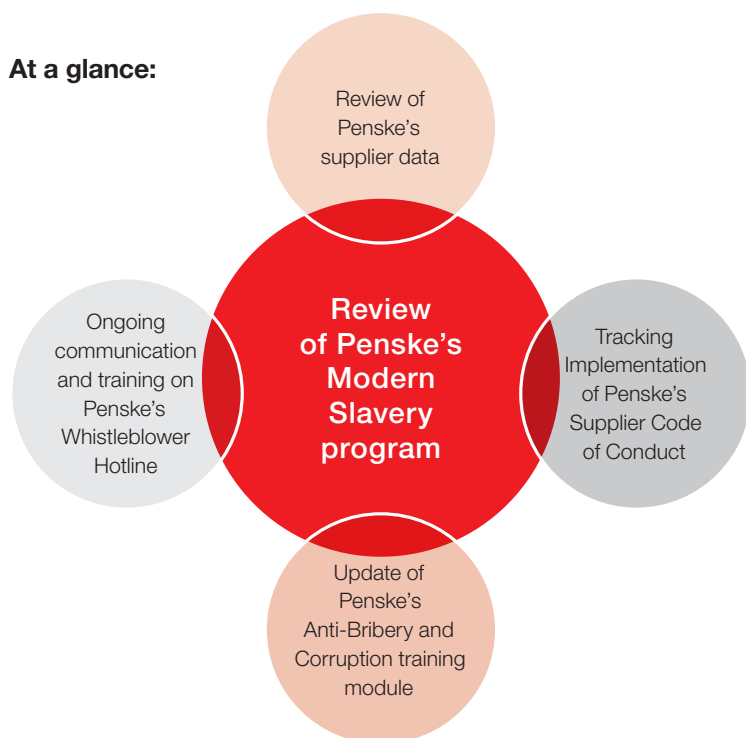
The high-risk industries which Penske sources products and services from are as follows:





DESCRIPTION OF ACTIONS TAKEN

At a glance:



Policies and procedures

Penske is committed to conducting business responsibly and maintaining and improving policies and procedures to assess, manage and mitigate the risk of modern slavery practices. Penske's Human Rights Policy highlights human rights risks and the principles which underpin Penske's commitment to upholding human rights. Penske's Code of Ethical Conduct details the principles, standards, and actions which make up the values and behaviours all employees are expected to align with. The Code of Ethical Conduct sets out the general framework which guides ethical conduct and decision making.

All procurement and purchasing personnel must comply with the standards of integrity, probity, professional conduct, and ethical behaviour set out in Penske's Procurement Policy and document the procurement process to demonstrate that decisions and purchases were made in accordance with the policy.

All new and renewing dealers in Penske's independent dealer network are required to comply with Penske's Human Rights Policy under written dealer agreements.

Penske's Supplier Code of Conduct sets out the requirements and expectations regarding various topics (e.g. modern slavery, anti-bribery and corruption, integrity and health and safety) which Penske has of its suppliers, contractors, subcontractors and consultants whilst doing business with Penske.

The Policies take guidance from the *UN Guiding Principles on Business and Human Rights* and *ILO General Principles for Fair Recruitment*. These policies are publicly available at www.penskeanz.com.

Awareness, training and communication

Penske recognises that awareness raising is a critical feature of instigating change. In the reporting year Penske reviewed and updated its Modern Slavery and Code of Ethical Conduct training. All new employees are required to complete this training at the commencement of their employment with Penske. Penske's modern slavery training helps employees to recognize modern slavery, understand how it might present in the course of their duties, and what they should do if they encounter any signs of modern slavery. Penske actively monitors completion of these modules.

Supplier obligations

As part of engaging with suppliers and using Penske's influence to mitigate the risk of modern slavery in the supply chain, Penske includes contract clauses in its supplier contracts which require suppliers to:

- act in a manner which is consistent with the principles contained in Penske's Supplier Code of Conduct, Human Rights Policy, and Anti-Bribery and Corruption Policy;
- have adequate procedures and policies in place to prevent modern slavery in a manner aligned with Australian and recognised international standards, including the UN Guiding Principles on Business and Human Rights;
- provide information about their labour practices and provide Penske with reasonable access to audit those practices; and
- communicate to their employees and their family members that Penske's Australian Whistleblower Policy and hotline are available to them.

Collectively these obligations are termed "Ethical Business " in this document.

Where Penske decides to accept contract conditions prepared by prospective suppliers in relation to significant purchase items, Penske has sought to include clauses that reflect the commitments above.

Due diligence and remediation

Penske's Third-Party Risk Assessment Procedure (the Procedure) details its process for identifying, assessing, and remediating modern slavery risks.

Based on Penske's risk assessment methodology, defined in the Procedure, select suppliers are subject to an instant due diligence assessment which involves screening against several sanctions and enforcements lists. A subset of suppliers, selected in accordance with criteria set out in the Procedure are also assigned a modern slavery questionnaire (MSQ) and anti-bribery and corruption questionnaire (ABCQ) for completion.

Completed MSQs receive a risk rating (low to high-risk) based on responses relating to:

- jurisdiction of the supplier;
- where the goods or services are grown, produced or manufactured;
- type of goods and services supplied to Penske;
- the controls (policies and procedures) suppliers have in place;
- modern slavery risk assessments and business impact on human rights; and
- staff training and awareness of human rights and modern slavery risks.

If a supplier receives a high-risk rating, or there is an allegation of modern slavery practices within Penske's supply chain, Penske will enquire into the matter to ascertain the facts and circumstances surrounding the modern slavery risk and/or allegation. Based on the circumstances, Penske will decide on an appropriate course of action which could include the following:

- I. undertake an audit of the supplier (e.g., attendance at supplier's premises and interviewing workforce);
- II. create a remediation plan to be implemented by the supplier;
- III. suspend the goods and/or services provided by the supplier until such time as Penske's enquiry into the matter has been concluded to Penske's reasonable satisfaction; or
- IV. terminate the supplier contract/engagement for the goods and/or services.

Penske's independently owned dealers are subject to a separate but extensive due diligence process using a similar compliance questionnaire prior to engagement and at every renewal. Rather than scoring and categorising dealers, given their importance to the Penske network, Penske assesses and investigates each independent dealer's responses individually.

Whistleblowers

Penske recognises the importance of whistleblowers in alerting conduct posing a modern slavery risk to attention for remediation. Penske has an established Speak Up program backed by an Australian Whistleblower Policy and anonymous reporting hotline, which is available to all employees, contractors and their families. Penske's standard ethical business clause in its supplier facing contracts requires suppliers to communicate to their employees and their family members that Penske's Australian Whistleblower Policy and hotline are available to them. Information about the Speak Up program is widely publicised throughout Penske's facilities, documents and website. Further, Penske's Whistleblower training module must be completed by all employees at the commencement of their employment and on a recurring basis following thereon.

Any whistleblower reports received are treated seriously, anonymously (if requested by the disclosing person) and investigated by a dedicated Whistleblower Review Group involving senior leaders of Penske. Outcome of the investigations are reported to the Compliance Risk Review Board and to Penske Automotive Group, Inc.'s Audit Committee.

Sanctions lists

Penske prohibits any business dealings with countries and entities, which are subject to UN Security Council Sanctions and Australia's autonomous sanctions, as published by the Australian Government Department of Foreign Affairs & Trade.

Future Goals

Penske's future goals in relation to its modern slavery program are captured below.

Supplier Risk Assessment

- continue risk profiling of Penske's supplier base
- enhancing relationships with suppliers to increase cooperation in relation to modern slavery risk management
- review results of supplier risk profiling exercise and identify target group of suppliers for due diligence
- develop remediation measures as required and appropriate in the relevant context

Suppliers

- working with suppliers to address gaps in modern slavery awareness, training and reporting within their workforce
- continue strengthening supplier relationships to improve engagement with Penske's modern slavery program
- review Supplier Code of Conduct adherence

Training

- maintain relevant and engaging awareness training for staff
- explore extension of modern slavery awareness training to independently owned dealerships
- strengthen supplier onboarding process and bi-annual evaluation process
- overhaul of the modern slavery training module



ASSESSING EFFECTIVENESS

The table below outlines how Penske proposes to assess the effectiveness of its modern slavery program. These may be adjusted to adapt to changes in its risk profile and to ensure reporting is relevant and responsive.

Area	Assessment
Policy	Review of Supplier Code of Conduct, Human Rights Policy and other policies identified as affecting modern slavery risk regularly on an as needed basis.
	Extent to which suppliers are required to comply with Penske's Supplier Code of Conduct and Human Rights Policy standards.
Training	Continued awareness training for all Penske staff and relevant contractors.
	Extent to which modern slavery training is conducted by dealers and suppliers.
	Annual review of relevance and currency of training material.
Supplier	Extent to which supplier contracts contain clauses to require suppliers to implement procedures and policies to act against modern slavery and to provide Penske with information about their practices.
	Proportion of and response to supplier commitment to comply with Penske's Supplier Code of Conduct via modern slavery questionnaire.
Risk assessment and remediation	Annual risk assessment of Penske operations for modern slavery risk.
	Extent to which suppliers are profiled for modern slavery risk.
	Number and proportion of suppliers identified as posing modern slavery risk.
	Extent to which due diligence is completed on suppliers meeting relevant risk threshold.
	Extent to which remediation actions are required and types of remediation taken.
	Extent to which remediation actions have been implemented and complied with.
Detection	Extent to which Penske's Speak Up/Whistleblower program is available and publicised.
	Number of reports of conduct posing a modern slavery risk.

PROCESS OF CONSULTATION

The Penske entities are centrally governed and managed with largely common directors across the companies. Penske's operational functions are supported by national teams for Finance, Procurement, Human Resources, Supply Chain, Information Technology, Compliance and Legal and Governance ensuring a consistent approach and shared efficiencies.

A diverse and consultative approach was taken with the various national teams mentioned above and the different business divisions to understanding Penske's operational and supply chain risks and developing an appropriate modern slavery program and statement in response.

Prior to being presented to the Board for review and approval, this statement was reviewed by relevant members of the Executive Management team including the Managing Director, Chief Financial Officer, Chief Operating Officer, General Manager – Legal and Compliance, and General Manager – People and Culture.

Thank you for reading this report.



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