Modern Slavery Statement
2025

CAR Group

Acknowledgement of Country

CAR Group acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respects to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

Globally, CAR Group recognises the significance of indigenous peoples' communities, consistent with our efforts to build a culture that embraces diversity, equality and inclusion.

About This Statement

CAR Group Ltd (ABN 91 074 444 018) and its wholly owned subsidiary, carsales.com.au Pty Ltd (ABN 97 670 975 943), are the reporting entities covered in this statement. This commitment to operating responsibly and upholding human rights applies across all CAR Group entities and business activities.

This Modern Slavery Statement covers the reporting period from 1 July 2024 to 30 June 2025 (FY25). It has been prepared in line with the *Commonwealth Modern Slavery Act 2018* and follows the structure outlined in the official *Guidance for Reporting Entities.*

CAR Group's Controlled Entities

CAR Group controls a range of entities in Australia and internationally. These entities are listed on pages 132 and 133 of CAR Group's FY25 Annual Report.

Consultation

In preparing this Statement, we engaged with a range of internal and external stakeholders. This included feedback from external experts across industry and academia, as well as insights from our training provider. This Statement was prepared in consultation with the entities owned or controlled by CAR Group Ltd, including carsales.com.au Pty Ltd and our global subsidiaries. Through our Modern Slavery Working Group, input was sought from key contacts in these entities to confirm the accuracy of the information provided, and to understand local-level risks and approaches to addressing them.

While the primary drafting was led by the CAR Group team, relevant representatives from controlled entities were engaged to provide feedback on specific areas of the Statement relevant to their operations. This process helped inform the sections relating to operational and supply chain risks across the Group.

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Introduction

Chair and CEO Statement

At CAR Group, we recognise that responsible business practices support trust in our platforms and the people behind them.

Pat O'Sullivan

Cameron McIntyre

As a global technology company with digital marketplaces across many markets, we understand the responsibility that comes with our scale. We are committed to promoting ethical and sustainable practices in our operations and supply chains.

This modern slavery statement outlines the actions we took in FY25 to strengthen our governance, engage with suppliers, and build a proactive approach to identifying and managing modern slavery risks.

During the year, we refined our due diligence processes and focused our assessments on higher-risk sectors and geographies. We rolled out modern slavery training to all Australian team members through an interactive module and continued to support supplier awareness and capability-building. Our Modern Slavery Working Group also played a role in creating consistency, accountability and continuous improvement.

Modern slavery remains a complex and evolving issue. We know that progress requires transparency, collaboration, and a willingness to adapt. In FY26 and beyond, we will continue to enhance our systems and practices to reflect our values, meet stakeholder expectations and contribute to an ethical and resilient supply chain.

Pat O'Sullivan
Non-Executive Chair
CAR Group Ltd

Cameron McIntyre
Managing Director and
Chief Executive Officer
CAR Group Ltd

Our FY25 Highlights

Rolled out modern slavery training to all Australian team members

We delivered a bespoke, interactive training module tailored to CAR Group, with mandatory completion for all new starters and annual refreshers.

Strengthened supplier due diligence processes

We focused assessments on higher-risk sectors and geographies, using a structured questionnaire and screening tool, with additional steps for high-risk suppliers.

Expanded supplier engagement and support

We provided modern slavery training materials and guidance to high-risk suppliers and continued to embed our Supplier Code of Conduct across the supply chain.

Deepened governance and oversight

Our cross-functional Modern Slavery Working Group drove progress across capability, policy and risk management, supported by Board-level oversight and senior accountability.

Our Culture

CAR Group's culture is more than a set of values. It's the foundation of how we operate, collaborate, and grow. It reflects who we are, how we show up for each other, and how we deliver on our purpose: to make buying and selling a great experience.

Our Group strategy articulates a clear and unifying cultural identity that supports high performance, innovation, and a sense of belonging. Our culture is defined by five core statements that guide behaviours and decision-making across the Group.

These statements have been endorsed by the Board, reinforced by our senior leaders, and are embedded in leadership expectations, employee experiences, and strategic initiatives, ensuring that culture remains a living part of CAR Group's identity as it grows globally. They also underpin how we manage our businesses, including our approach to addressing modern slavery.

We think differently
Innovation is at our core, we challenge convention and seek better ways to do things.

We are passionate about what we do
Our energy and commitment drive us to deliver great outcomes.

We've got the courage to try new things
We embrace experimentation and learn from failure.

We collaborate for growth
We believe in the power of teamwork to unlock potential and scale impact.

We have fun, but we get it done
We balance performance with enjoyment, creating a workplace that's both productive and energising.
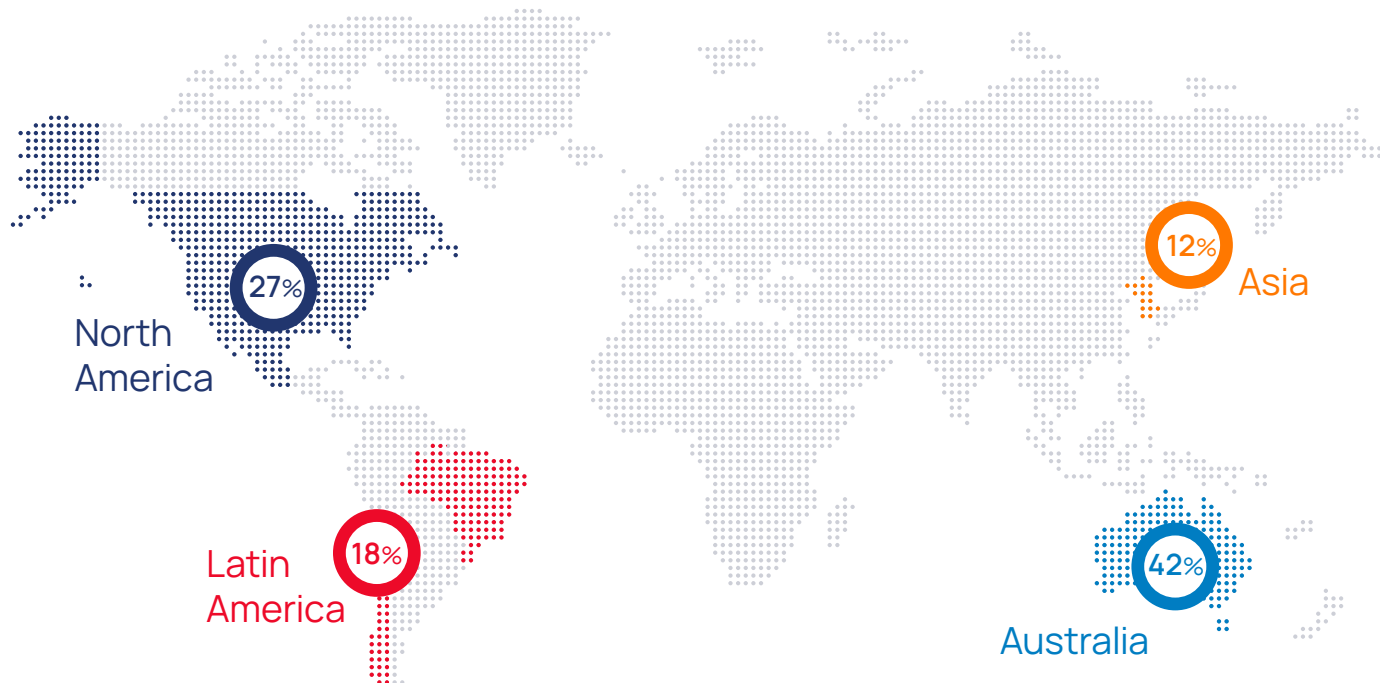
1. About CAR Group

CAR Group Limited ("CAR Group" or "the Group") is a global digital marketplace business dedicated to making buying and selling a great experience. With a vision to be the global leader in online vehicle marketplaces, we offer world-leading technology and advertising solutions designed to transform how people buy and sell across the globe.

Employing more than 2,500 people, CAR Group operates across diverse vehicle categories - automotive, commercial, industrial, and leisure - and spans several international markets including Australia (carsales), South Korea (Encar), the United States (Trader Interactive), Chile (chileautos) and Brazil (majority shareholder of webmotors). We also operate RedBook data businesses across Australia, New Zealand and Asia.

CAR Group operates scalable, data-driven digital marketplaces, powered by digital innovation and a strong performance culture. We bring together technology platforms that support listings, transactions, and advertising, alongside data and analytics to enhance customer experience, and customer-centric innovation designed to continuously improve platform functionality and user engagement.

Our Commitment to Human Rights

We take a principled and proactive approach to managing social and ethical risks in our supply chain. Our approach is grounded in transparency, accountability, and alignment with our values.

By maintaining high standards and embedding responsible business practices across the supplier lifecycle, we aim to protect people, uphold human rights, and meet the expectations of our customers, team members, and communities we serve. This not only reduces legal and reputational risk but also strengthens the resilience and integrity of our business.

North America **27%**

Latin America **18%**

Asia **12%**

Australia **42%**

Percentages refer to Proforma Revenue contribution per segment. Proforma Revenue contribution adds to 100% when investments segment is included.

2. Our Operations and Supply Chain

2.1 Our Workforce

At CAR Group, our people are at the heart of our success. We employ over 2,500 highly skilled, professional team members across our operations, with most roles focused on technology development, product, design, data analytics, strategy, marketing, advertising, and corporate services.

We foster a culture where all team members are heard, can contribute meaningfully, and grow with the business, regardless of their role or location.

Table 1. CAR Group's Workforce

Employment Status (at 30 June 2025)	Employees
Full time	**2,508**
Permanent[1]	2,335
Fixed term[2]	173
Part time	**62**
Permanent	42
Fixed term	20
Casual[3]	**27**
Total CAR Group Headcount	**2,597**

1 Permanent employees are employed by CAR Group on a full time (38 hours per week) or part time (less than 38 hours per week) basis.

2 Fixed term employees are employed by CAR Group for a fixed term (their employment has an agreed end date).

3 Casual employees are paid on an hourly basis.

## 2. Our Operations and Supply Chain continued

2.2 Our Operations

CAR Group operates leading online vehicle marketplaces that support both private sellers and dealers. Our core offering includes online advertising services, including display advertising, as well as a range of data and research products.

Across our markets, we also provide a range of complementary services. These include software solutions, research and reporting, vehicle valuations and appraisals, website development and hosting, and photography. In selected regions, we offer vehicle inspections and repair or maintenance services as part of this broader services portfolio.

Our core businesses operate in Australia, the United States, Brazil, South Korea, and Chile.

Figure 1. Key Brands, Service Areas and Business Models Across CAR Group's Operations

Brand	Key Area	Description	Business Model
carsales	Dealer	Dealer vehicle listing	Subscription and pay per lead
	Private	Private seller listings	Pay up-front until sold
	Media	Digital advertising on websites	Cost per view
	Data, research and services	Vehicle specification data	Periodic subscription
TRADER INTERACTIVE	Dealer	Dealer vehicle listing	Monthly subscription based on inventory
	Private	Private seller listings	Pay up-front until sold
	Media	Digital advertising on websites	Cost per view
	Data, research and services	Vehicle specification data	Periodic subscription
webmotors / chileautos	Dealer	Dealer vehicle listing	Subscription and pay per lead
	Finance	Finance application on vehicle ads	Up-front commission on loan commencement
	Private	Private seller listings	Pay up-front until sold
	Media	Digital advertising on websites	Cost per view
Encar	Standard ads	Dealer vehicle listing	Pay up-front until sold
	Guarantee	Encar inspects and certifies car	Pay per car inspected
	Dealer direct	Digital trade-in	24hr dealer auction, winning dealer pays
	Home	Digital home delivery service	Pay up-front upon reservation

2. Our Operations and Supply Chain continued

2.3 Our Supply Chain

CAR Group's supply chain underpins our ability to operate and grow as a global digital marketplace. While we are a technology-led business, we rely on a broad network of suppliers that support our platforms, operations, and people across several countries. These suppliers deliver the tools, services, and expertise we need to connect buyers and sellers, manage our infrastructure, and scale our business globally.

In FY25, we utilised over 10,000 direct suppliers across our global operations. The majority of our procurement spend remained concentrated in Brazil, Australia, and the United States, with smaller portions in South Korea, India, and Ireland.

Our supply chain can be described in three main segments: Technology, Corporate Services, and Operational Support.

CAR Group's supply chain reflects the nature of our business as a global technology company operating digital marketplaces. Our suppliers provide a wide range of products and services, from digital infrastructure to marketing support and professional services.
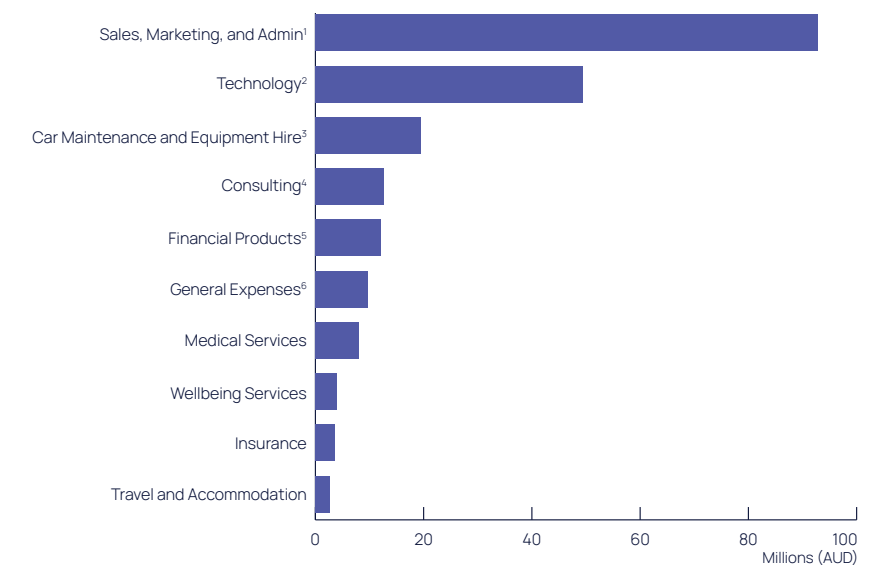
We primarily purchase:

- **Marketing and media:** including digital advertising, branded merchandise, and sponsorships that support our brand presence.
- **Technology and software services:** including cloud platforms, IT infrastructure, and software licences to power our marketplaces.
- **Professional services:** including specialist consultants and business support contractors.
- **Facilities and property:** including office rent, fit-outs, and services such as cleaning and waste management.
- **Travel and logistics:** including accommodation, flights, and ground transport.

Figure 2. Spend by Country

● Brazil	31%
● Australia	25%
● United States	22%
● South Korea	15%
● India	3%
● Ireland	2%
● Chile	1%
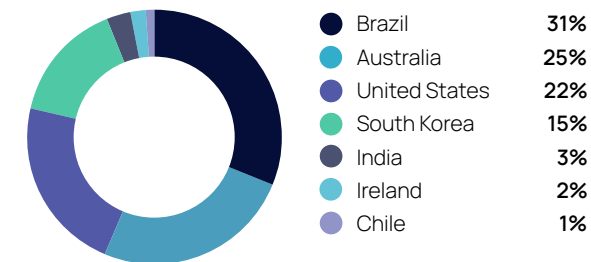
Only countries with values above 1% are shown.

Figure 3. Top 10 Categories by Spend

> **10,000**
Suppliers Assessed

$274.9m
Total Spend (AUD)

26
Countries

1. Sales, Marketing, and Admin represents procurement spend across Advertising and Marketing, Digital/Social Media, Trading Companies and Distributors, and Finance and Administration.
2. Technology represents procurement spend across Software, Broadband/Web Hosting, ICT, and Data Processing and Outsourced Services.
3. Car Maintenance and Equipment Hire represents procurement spend across Car Maintenance and Repair, and Equipment and Plant Hire.
4. Consulting represents procurement spend across Consulting Services and Professional Services.
5. Financial Products represents procurement spend across Financial Products and Diversified Capital Markets.
6. General Expenses represents procurement spend across General Expenses and Temporary Expenses.

3. Identifying our Modern Slavery Risks

3.1 Risks in Our Operations

CAR Group's business is built around operating digital marketplaces and online platforms, supported by a skilled and professional workforce. Most of our team members are directly engaged in office-based roles, working in countries where strong labour protections and regulatory frameworks are in place. This structure means that the risk of modern slavery within our direct operations is considered low.

Our operations are based primarily in Australia, the United States, Brazil, South Korea, and Chile - countries that are broadly recognised as having relatively low vulnerability to modern slavery. Most of our people are employed under direct, permanent contracts, with clear entitlements and access to internal grievance processes.

That said, we remain conscious that operational risk is not uniform. In some parts of our business, there is potential for elevated risk. These include:

- **Operations in higher-risk jurisdictions:** The majority of CAR Group's operations are based in countries with low modern slavery risk, including Australia, the United States, Brazil, South Korea, and Chile. We also maintain a small team of employees in Malaysia, China, and Thailand as part of our RedBook business. These roles are managed from Australia and follow consistent employment and governance practices. Given the limited size and strong oversight in place, these operations are considered low risk.

- **Use of offshore business services:** Some support functions, such as customer service and data processing, may be delivered from locations where third-party staffing models and lower oversight can increase the risk of poor labour conditions.

- **Contingent labour arrangements:** We acknowledge that contingent labour can present modern slavery risks in some contexts. However, CAR Group's use of contingent workers is predominantly limited to skilled professional roles, which significantly reduces this risk within our operations

We actively consider these risk factors in our governance and procurement decisions and will continue to monitor operational practices to ensure we maintain appropriate visibility and controls across the Group.

3.2 Identifying Supply Chain Risk

To identify and prioritise the most significant modern slavery risks in CAR Group's operations and supply chains, we engaged Edge Impact to conduct an independent risk assessment. This process aligns with recognised global frameworks, including the UN Guiding Principles on Business and Human Rights (UNGPs), and reflects our shift from compliance to proactive risk governance.

1. Supplier Spend Mapping

Edge Impact reviewed our FY24/25 procurement spend, categorising expenditure by product and service type. This provided insight into the scale and concentration of our purchasing across business areas.

2. Multi-Source Risk Screening

Edge Impact assessed each procurement category against multiple global risk indicators and data sources, including:

- EXIOBASE (input-output life cycle database)
- Social Hotspot Database
- Global Slavery Index
- Child Rights Index
- A targeted media and academic literature review

This data was applied across the full supply chain lifecycle - from raw material extraction and processing to manufacturing and delivery - and was normalised to CAR Group's procurement spend by geography and sector. The output of this stage was an inherent risk score for each procurement category, representing the likelihood of modern slavery exposure in the absence of supplier-specific controls.

3. Applying the UNGPs: Understanding CAR Group's relationship to risk

To support effective and proportionate responses, CAR Group assessed its relationship to each risk domain using the UNGPs framework. This involved evaluating whether the Group may:

- Cause harm through its own actions or decisions,
- Contribute to harm through its business practices or relationships, or
- Be directly linked to harm through its products, services, or suppliers.

This framing has helped clarify CAR Group's responsibility to act, consistent with the UNGPs. Where the Group may cause or contribute to harm, we recognise our responsibility to take proactive steps to prevent and mitigate that harm. Where we are directly linked to harm through business relationships, we focus on using our leverage and influence to support risk reduction and improved outcomes for affected workers.

3. Identifying our Modern Slavery Risks continued

3.3 Our Risk Assessment Findings

The findings from our supply chain risk assessment are helping us take a more targeted approach to identifying and mitigating modern slavery risk. These insights are guiding the prioritisation of actions and shaping focused initiatives to address areas of higher concern.

Based on the results of the independent risk assessment, several high-risk areas for modern slavery were identified within CAR Group's top 10 procurement categories. These include:

Advertising and marketing (digital marketing and social media)

Car maintenance and repair services

Information and communications technology (ICT) (including equipment, data processing and outsourced services)

Data processing and outsourced services

Travel and accommodation

The figure below represents the outcome of our assessment, illustrating our risk across our top spend categories.

Figure 4. CAR Group Inherent Risk by Top 10 Categories of Spend

Assessment	Risk	
Sales, Marketing, and Admin	Very high	
Technology	Very high	
Car Maintenance and Equipment Hire	Very high	
Consulting	Low	
Financial Products	Medium	
General Expenses	Medium	
Medical Services	Low	
Wellbeing Services	High	
Insurance	Low	
Travel and Accommodation	Very high	

3. Identifying our Modern Slavery Risks continued

3.4 Our Key Risk Areas

The table below presents inherent risks identified across CAR Group's key procurement categories. These are risks that may be present globally, based on industry practices, supply chain structures, and known vulnerabilities. While not all risks apply directly to CAR Group's operations or suppliers, this analysis helps inform where further due diligence, controls, or mitigations may be warranted. Specific controls in place are described in section 4 of this statement.

Table 2: Key Risk Areas for CAR Group

Risk Domain	Nature of Risk	UNGP Association
Advertising and Marketing (Digital & Social)	Use of offshore content producers, digital freelancers, or influencers through third-party agencies or platforms. These roles may involve informal contracts, poor payment terms, or lack of labour protections.	Directly Linked
Vehicle Inspection and External Labour (South Korea)	Use of third-party providers for vehicle inspections and specialist support roles (e.g. data verification, content production, consultancy) may involve subcontracted or informal labour. Risks include underpayment, job insecurity, and limited visibility over working conditions - particularly in inspection services linked to the Guaranteed listing product, where oversight is weaker and employment models vary.	Directly Linked (with potential for contribution depending on contracting and commercial practices)
ICT (Hardware, Equipment, Services)	Risks in upstream electronics manufacturing (e.g. forced or bonded migrant labour in China or Malaysia), particularly in Tier 2+ production of laptops, servers, and peripherals. Mining and refining of raw materials (e.g. cobalt, tungsten, gold, tin) used in electronics are linked to forced and child labour, particularly in the Democratic Republic of the Congo, Indonesia, and Myanmar. While Tier 1 suppliers are often large, reputable vendors, traceability and leverage in lower tiers are limited.	Directly Linked
Data Processing and Outsourced Services	Use of offshore teams for customer service, data entry, or analytics—often hired through third parties. Risks may include informal contracts, excessive hours, and low wages, especially in countries with weak labour protections.	Directly Linked / Contribute (if commercial terms enable exploitative practices)
Travel and Accommodation	Hotels, flights, and transport booked via third-party platforms may involve services (e.g. room cleaning, baggage handling) in high-risk jurisdictions, where labour rights violations are more common.	Directly Linked

CASE STUDY
Independent Risk Assessment

In FY25, CAR Group engaged an external consultancy, Edge Impact, to conduct an independent risk assessment of our supply chain. This was our first independent review of modern slavery risks across the business and formed a key step in maturing our approach to responsible sourcing.

The assessment provided a clearer view of where modern slavery risks are most likely to occur in our supply chain, based on the types of goods and services we procure and where they are sourced. It confirmed that risks are not evenly distributed, with some categories - such as technology hardware and digital services - presenting higher levels of inherent risk due to known sector and geography factors.

The process also helped us better understand how CAR Group may be connected to these risks. Using the UNGPs, we considered whether we may cause, contribute to, or be directly linked to potential harm. This framing has strengthened our internal understanding of where our responsibility lies, particularly in areas where we have leverage to influence supplier practices.

The findings have already started to inform decision-making within legal, procurement and sustainability teams. We are using the insights to improve how we prioritise supplier due diligence, review commercial arrangements in high-risk areas, and engage more effectively with selected suppliers.

This work lays an important foundation for our ongoing efforts to reduce modern slavery risks and improve outcomes for workers in our supply chain.
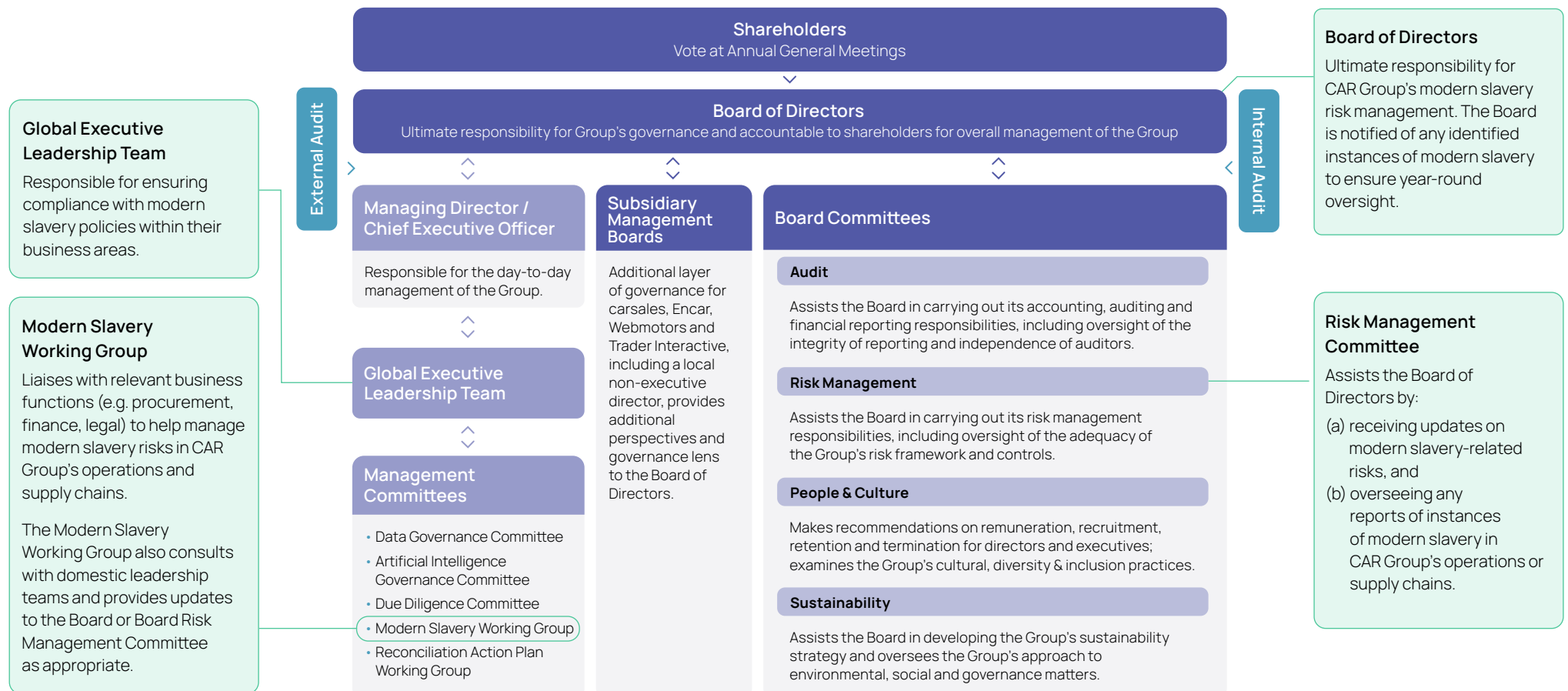
4. Addressing our Modern Slavery Risks

4.1 Our Governance

As a global Group, our governance framework supports effective oversight and risk management across all parts of the business. Robust policies, systems, leadership and training are essential elements of our governance framework, helping us manage strategic, operational, reputational and financial risks – including modern slavery risks.

Modern slavery risk is managed through clear lines of accountability. Oversight sits with the Board and relevant Committees, with implementation supported by the Global Leadership Team and the Modern Slavery Working Group. This coordinated structure ensures consistent action, compliance with regulatory requirements, and continuous improvement.

Further detail about our corporate governance arrangements is available in our FY25 Corporate Governance Statement. Key components of our governance structure that support modern slavery compliance are shown in Figure 5.

Figure 5: Governance Roles Supporting Modern Slavery Compliance

Global Executive Leadership Team
Responsible for ensuring compliance with modern slavery policies within their business areas.

Modern Slavery Working Group
Liaises with relevant business functions (e.g. procurement, finance, legal) to help manage modern slavery risks in CAR Group's operations and supply chains.

The Modern Slavery Working Group also consults with domestic leadership teams and provides updates to the Board or Board Risk Management Committee as appropriate.

External Audit

Internal Audit

Shareholders
Vote at Annual General Meetings

Board of Directors
Ultimate responsibility for Group's governance and accountable to shareholders for overall management of the Group

Managing Director / Chief Executive Officer
Responsible for the day-to-day management of the Group.

Global Executive Leadership Team

Management Committees
• Data Governance Committee
• Artificial Intelligence Governance Committee
• Due Diligence Committee
• Modern Slavery Working Group
• Reconciliation Action Plan Working Group

Subsidiary Management Boards
Additional layer of governance for carsales, Encar, Webmotors and Trader Interactive, including a local non-executive director, provides additional perspectives and governance lens to the Board of Directors.

Board Committees

Audit
Assists the Board in carrying out its accounting, auditing and financial reporting responsibilities, including oversight of the integrity of reporting and independence of auditors.

Risk Management
Assists the Board in carrying out its risk management responsibilities, including oversight of the adequacy of the Group's risk framework and controls.

People & Culture
Makes recommendations on remuneration, recruitment, retention and termination for directors and executives; examines the Group's cultural, diversity & inclusion practices.

Sustainability
Assists the Board in developing the Group's sustainability strategy and oversees the Group's approach to environmental, social and governance matters.

Board of Directors
Ultimate responsibility for CAR Group's modern slavery risk management. The Board is notified of any identified instances of modern slavery to ensure year-round oversight.

Risk Management Committee
Assists the Board of Directors by:
(a) receiving updates on modern slavery-related risks, and
(b) overseeing any reports of instances of modern slavery in CAR Group's operations or supply chains.

4. Addressing our Modern Slavery Risks continued

4.2 Our Policies

Maintaining clear and well-embedded policies is a key part of CAR Group's commitment to responsible business practices. These policies guide how we identify, manage and respond to risks such as modern slavery across our operations and supply chains. A summary of our key policies is provided in Table 3.

Table 3: Policy Framework

Policy	Relevance to Modern Slavery
Modern Slavery Policy	Since our first Modern Slavery Statement in FY20, we have developed a range of processes to help manage modern slavery risks in our operations and supply chains. Our overarching Modern Slavery Policy formalises these processes and promotes consistency and awareness across CAR Group. It outlines: • Requirements for onboarding new suppliers, including supplier questionnaires • Our methodology for assessing modern slavery risks • Management of identified modern slavery risks in our supply chains • Remediation arrangements for identified incidents • Training expectations for internal and external stakeholders
Code of Conduct	Our Code of Conduct outlines the ethical guidelines and principles that guide our behaviour and the interactions of our team members. It supports us with ensuring consistency in decision-making across diverse cultural and geographical contexts, maintaining the reputation of our businesses, promoting ethical practices, and compliance with legal requirements on a global level. Key principles that assist us in addressing modern slavery risks include: • Acting in accordance with the highest ethical standards • Respecting and abiding by all laws both domestically and internationally • Complying with all local and global company policies, procedures and guidelines, which address issues such as work hours and employment conditions • Outlining a zero-tolerance approach to unlawful discrimination, harassment of any kind, violence and offensive conduct • Providing a healthy and safe environment for all team members, contractors and visitors • Valuing and acting to embrace and respect diversity

Policy	Relevance to Modern Slavery
Supplier Code of Conduct	Our Supplier Code of Conduct outlines the ethical, social, environmental, and business standards expected of all CAR Group suppliers. The purpose of the Code is to ensure that suppliers align with our values and expectations and promote responsible and ethical business practices, including through the supplier's own supply chains. Our Code was first developed to reflect the Responsible Business Alliance Code of Conduct, which was prepared with reference to international norms and standards. This includes the Universal Declaration of Human Rights, ILO International Labour Standards, OECD Guidelines for Multinational Enterprises and ISO and SA standards. Our Code sets out a range of principles relating to modern slavery risk mitigation. It seeks commitments from suppliers that: • Human rights of workers will be upheld • They comply with applicable laws regarding labour practices and human rights • There are no unreasonable restrictions on workers' freedom of movement • Their personnel will not be required to surrender government-issued identification, passports, or work permits as a condition of employment • Working hours do not exceed the maximum set by law • All wages and benefits comply with applicable awards and laws • There is no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, nor is there the threat of any such treatment. Australian entities within CAR Group use this Supplier Code of Conduct. Some international CAR Group entities adopt versions tailored to their local operating environment, such as in the local language, but these retain the same core principles.

## 4. Addressing our Modern Slavery Risks continued

Table 3: Policy Framework continued

Policy	Relevance to Modern Slavery
Human Rights Policy	We are committed to respecting human rights and complying with all laws in the jurisdictions where we operate. Our Human Rights Policy reflects our commitment to the ten principles of the United Nations Global Compact regarding human rights, labour, environment and anti-corruption.
Procurement Framework	Our Procurement Framework facilitates the integration of modern slavery risk controls in our procurement operations. For example, for CAR Group's Australian entities, suppliers are asked to complete our supplier questionnaire and accept our Supplier Code of Conduct as part of our supplier onboarding process.
Risk Management Policy	Our Risk Management Policy details how we identify, assess, and manage various types of risks to protect our operations and stakeholders. The policy defines responsibilities, risk assessment methods, mitigation strategies, and compliance measures to facilitate effective risk management.
See Something? Say Something! Policy	Replacing our former Whistleblower Policy, this policy is designed to make it easier for team members (past and present), contractors, suppliers, and other stakeholders to raise concerns about behaviour that breaches global or local workplace policies, or that feels unsafe, unfair, unethical, or simply 'not right'. *See Something? Say Something!* clearly outlines all available avenues for speaking up, including confidential and anonymous options. A *See Something? Say Something!* clause has also been embedded into key global policies - including our Code of Conduct, Anti-Bribery and Corruption Policy, Diversity, Equity and Inclusion Policy, and Human Rights Policy.
Anti-Bribery and Corruption Policy	All CAR Group team members must be aware of and understand the relevant obligations and requirements to protect the Group and its people from bribery and corruption risks. This policy sets out principles and guidelines to ensure bribery and corruption risks are appropriately minimised and mitigated, and guides the mechanisms used to address actual or suspected acts of bribery or corruption. It enables CAR Group to prevent, detect and respond to bribery and corruption risks and comply with Anti-Bribery and Corruption laws in relevant jurisdictions.

ⓘ CAR Group's policies can be found on our shareholder website

cargroup.com/charters/ ⟩
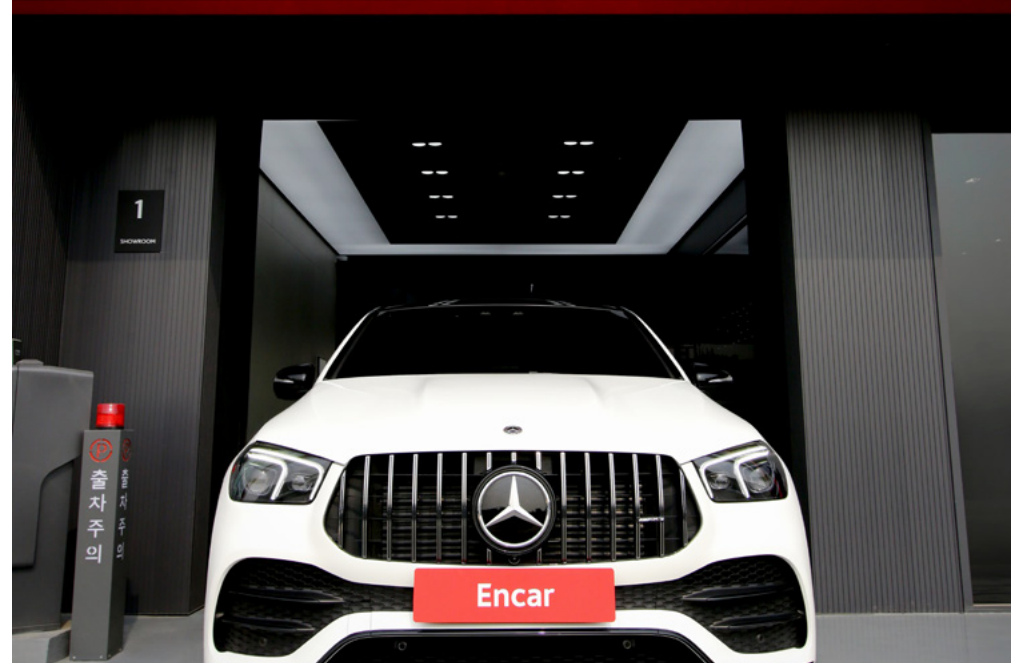
CASE STUDY

Aligning Supplier Expectations in Korea

In FY25, CAR Group progressed efforts to standardise supplier governance across global operations by adopting the Group Supplier Code of Conduct (SCoC) within our Korean business, Encar, for the first time.

Previously, Encar used a localised supplier onboarding process, which created inconsistencies in how ethical sourcing expectations, particularly around modern slavery and labour rights, were communicated and enforced. To address this, the CAR Group and Encar teams worked collaboratively to align documents, ensuring the Group SCoC could be implemented in a way that meets both CAR Group standards and local legal requirements.

The Group SCoC sets clear expectations on human rights, workplace conditions, and grievance processes, aligned with international frameworks. From FY25, all new suppliers engaged by Encar are required to adhere to the same standards as those across our wider operations.

This change strengthens consistency, enables clearer risk oversight, and supports a unified approach to managing supplier-related human rights risks.

4. Addressing our Modern Slavery Risks
continued

4.3 Our Due Diligence Process

CAR Group continues to evolve and strengthen our approach to identifying and managing modern slavery risk across our supply chains. Our due diligence process is embedded into supplier onboarding and ongoing supplier relationships. This helps us take a more targeted, risk-based approach.

We aim to gather modern slavery information from suppliers through a questionnaire. Responses are assessed through our supplier screening tool, which evaluates their risk profile. Where a higher risk is identified, the matter is referred to our Modern Slavery Working Group for review and further action.

Where a questionnaire cannot be completed, we assess risk using other sources of information such as the supplier's modern slavery statement, relevant policies, publicly available data, or informal discussions.

We expect suppliers to:

- Notify us of any suspected instances of modern slavery
- Maintain records that allow us to verify the source of goods or services
- Agree to meet the expectations set out in our Supplier Code of Conduct
- Provide reasonable access to records and premises, where appropriate
- Support the training of their employees and subcontractors

Where a supplier has its own Code of Conduct, we assess its alignment with our expectations. If it meets a similar standard, we may accept it in place of CAR Group's Supplier Code of Conduct.

CASE STUDY
Leveraging Technology for Supplier Screening in Brazil

CAR Group's Brazilian business, webmotors, operates in a partnership structure alongside Santander Bank, which has contributed to the development of a mature and structured procurement governance process. As part of their due diligence approach, the webmotors procurement team uses a platform called Linkana to conduct integrity checks on all prospective suppliers.

Linkana consolidates public data to assess suppliers for potential compliance concerns - including environmental violations, outstanding debts, and inclusion on government watchlists. The platform generates a risk rating from A to E, with only suppliers rated A or B permitted to proceed. This initial screening is completed before any contract negotiations begin and is required for all suppliers above a set financial threshold.

This technology-enabled process ensures that suppliers engaged by webmotors meet minimum standards of legal and ethical conduct. It also supports broader risk management objectives, including modern slavery prevention, by filtering out suppliers with known compliance red flags.

The due diligence system is embedded into a tiered procurement workflow, which includes quotation comparisons, legal contract review, and appropriate sign-off levels based on the value of the engagement. This approach demonstrates how structured procurement systems and early-stage risk screening can help reduce exposure to labour exploitation and strengthen overall supplier accountability.

4. Addressing our Modern Slavery Risks continued

4.4 Building Capability and Awareness

CAR Group recognises that effective modern slavery risk management relies on building awareness and capability across our workforce. We provide our team members with access to a range of training and support tools designed to ensure staff can recognise and respond appropriately to modern slavery risks.

Our training approach includes:

- **eLearning modules:** A core modern slavery training module, developed in partnership with an external provider, is delivered to team members via a SCORM-compliant platform. It includes interactive content and scenario-based quizzes to reinforce understanding.
- **Onboarding integration:** Completion of the modern slavery module is mandatory for all Australian-based team members and is embedded within the onboarding program for new starters.
- **Supporting materials:** Team members have access to background resources, internal guidance documents, and step-by-step instructions for identifying and reporting concerns.
- **Scenario-based exercises:** Tabletop simulations and facilitated workshops are used to explore hypothetical modern slavery incidents with relevant teams, helping to strengthen incident response capability.

External Awareness and Training

To support risk reduction beyond our direct operations, CAR Group also extends education and support to suppliers.

Our supplier training initiatives include:

- **Training access for questionnaire respondents:** Suppliers who complete our modern slavery due diligence questionnaire are given access to tailored training materials and guidance.
- **Targeted follow-up:** In high-risk categories, we follow up with selected suppliers to encourage engagement with training materials and provide clarification on our expectations.

These efforts aim to support supplier capability uplift and ensure that our ethical sourcing commitments are clearly understood by our business partners.

CASE STUDY

FY25 Internal Training Roll Out

In FY25, CAR Group expanded its modern slavery awareness program, delivering training to all Australian team members for the first time. This represented a significant shift from previous years, where training was targeted to specific teams.

Key highlights included:

- **Full workforce rollout:** All team members received access to the modern slavery eLearning module, creating consistent baseline awareness across the organisation.
- **Interactive module design:** The training was tailored to CAR Group's operating context and included quiz-based learning scenarios to test understanding.
- **Annual refresh commitment:** The training module will be refreshed and reissued annually to maintain relevance and reinforce key messages over time.

This rollout marked a step change in how modern slavery risks are understood across CAR Group and forms part of a broader investment in sustainability capability across the business.

4. Addressing our Modern Slavery Risks
continued

4.5 Grievance and Remediation

Where concerns or potential risks are identified in our supply chain, we take a case-by-case approach to remediation, grounded in our values and supplier expectations.

Depending on the nature and severity of the risk, our actions may include:

- Requiring the supplier to rectify risks before the engagement commences
- Restricting the scope of engagement
- Enhanced surveillance and audits
- Conducting a deeper analysis of the relevant tier two suppliers
- Seeking additional contractual assurances
- Requiring the supplier to undergo training
- Discussing our concerns with the supplier
- Where modern slavery risks cannot be mitigated or managed, we will engage an alternative supplier and/or terminate the existing supplier relationship
- Dedicated modern slavery contact point for suppliers to be able to contact us with any questions or issues

CASE STUDY

Reinforcing our Whistleblower and Informal Grievance Pathways

In FY25, CAR Group rebranded its whistleblower program under a new, more accessible identity: *See Something? Say Something!* This change was driven by a desire to increase awareness of reporting pathways and ensure that all team members feel confident raising concerns.

While internal grievance data shows that employees are willing to speak up when needed, our formal Whistleblower Service was underutilised. We saw an opportunity to simplify the process and improve visibility by uniting all reporting channels under a single, easy-to-remember banner.

The updated *See Something? Say Something!* Policy includes our formal whistleblower process alongside other internal reporting options, such as:

- Speaking to a line manager or leadership team member,
- Contacting the People and Culture team, or
- Emailing our monitored internal inbox: seesomethingsaysomething@cargroup.com.

To support the rollout, we are launching a global communications campaign and placing signage in our offices to promote awareness. The goal is to make it easy for employees, contractors, and suppliers to raise concerns - whether about misconduct, unethical behaviour, or human rights issues in our operations or supply chain.

This initiative reflects CAR Group's commitment to open communication, transparency, and early issue resolution.

5. Measuring the Effectiveness of our Actions

Measuring the effectiveness of our actions is essential to ensuring that our response to modern slavery risks is meaningful and leads to continuous improvement. We assess our progress against three overarching goals:

- Reducing the risk of modern slavery in our operations and supply chains
- Responding promptly to concerns when they arise
- Enabling internal and external stakeholders to take informed and tangible action

We also reflect on how well we have delivered against the specific priorities outlined in previous Modern Slavery Statements. This includes reviewing qualitative indicators, stakeholder feedback, and the extent to which modern slavery considerations are embedded in decision-making.

Effectiveness is formally reviewed annually by the Sustainability team, working closely with relevant business units as part of our broader sustainability performance cycle. This process helps ensure our actions remain relevant, proportionate, and aligned with our risk profile.

Table 4: Update on Last Year's Commitments

Commitment	Progress
Goal 1: Targeted in-depth engagement with selected existing suppliers of higher-risk products/services	**Complete** ✓
In FY25, CAR Group will conduct a targeted review of selected ongoing suppliers that provide higher-risk products or services. The focus of this review will include: • Obtaining assurances that suppliers are meeting CAR Group standards, and any additional commitments made by the suppliers regarding modern slavery compliance measures when they were onboarded. • Ensuring CAR Group has an active and ongoing dialogue with these suppliers about modern slavery issues. • Ensuring these suppliers have good knowledge of modern slavery issues and providing support to help uplift their capabilities if it is found to be lacking.	Undertaken external risk assessment to allow us to prioritise high-risk products and services for future engagement.
Goal 2: Internal review of selected controls	**Complete** ✓
In FY25, our Internal Audit team will review selected key modern slavery controls to further help us measure our effectiveness and identify potential improvements.	In FY25, we shifted focus from internal audit to undertaking an external risk assessment. This will support more targeted reviews of key controls over the highest-risk products and services in future years.
Goal 3: Synergies with domestic and international CAR Group businesses	**In progress** ↻
Whilst CAR Group operates a decentralised procurement model, in FY25 the Modern Slavery Working Group will focus on exploring synergies across international subsidiaries to further improve processes and reporting data.	Internal engagement has commenced, including one-on-one meetings between Sustainability and relevant business leads. A modern slavery champion has been appointed in each international business to support alignment and knowledge sharing across jurisdictions.
Goal 4: Tabletop exercise for managing modern slavery incidents	**In progress** ↻
Building on the success of our previous tabletop exercise, in FY25 we will involve more internal stakeholders in further tabletop exercises that consider a range of modern slavery issues, with the aim of further increasing knowledge and awareness of modern slavery risks and processes across our businesses.	Training rolled out across Australia.
Goal 5: Continue to positively engage with our suppliers.	**Complete** ✓
As in previous years, we will continue to positively engage with our suppliers about modern slavery issues. We will also review our Supplier Code of Conduct to ensure it aligns with current best industry practice, such as reflecting the requirements of the most recent Responsible Business Alliance Code of Conduct.	Supplier Code of Conduct review was completed in July 2025.

5. Measuring the Effectiveness of our Actions continued

Table 5: Update on Key Performance Indicators

KPI	FY21	FY22	FY23	FY24	FY25
Global					
Grievances: Number of grievances submitted relating to modern slavery	0	0	0	0	0
Modern slavery incidents: Number of identified instances of modern slavery in CAR Group's operations or supply chains	0	0	0	0	0
Remediation: Number of identified modern slavery incidents that have involved remediation action by CAR Group	0	0	0	0	0
Notified instances of modern slavery in supply chains: Reported instances from suppliers of modern slavery in a supplier's operations or supply chains	0	0	0	0	0
Australian Operations					
Modern slavery training: Percentage of employees who have been assigned modern slavery training that have completed that training. Training is considered valid for 12 months and must then be recompleted	N/A	100%	100%	100%	83%[1]
Mandatory training: Percentage of employees who have been assigned mandatory induction training that have completed that training (e.g. covering our Global Code of Conduct, Global Whistleblower Policy)	96%	98%	99%	99%	98%
Code of Conduct: Percentage of suppliers who completed the onboarding questionnaire and agreed to comply with CAR Group's Supplier Code of Conduct	97%	95%	93%	90%	95%

1   The reason for the YoY drop in this figure is due to the timing of the roll out of our new modern slavery training module to all Australian team members which commenced late in FY25. At the time of reporting not all team members had had sufficient time to complete the online training. We expect that this figure will be significantly higher in future years.

6. Our Future Commitments

We recognise that addressing modern slavery is an ongoing responsibility. As our business grows and the world around us changes, so too must our approach. In FY26 and beyond, CAR Group will continue to strengthen how we identify and manage modern slavery risks.

Table 6: Our Future Roadmap

Area	Future Actions
Synergies with domestic and international CAR Group businesses	Whilst CAR Group operates a decentralised procurement model, in FY26 the Modern Slavery Working Group will continue to focus on exploring synergies across international subsidiaries to further improve processes and reporting data.
Prioritisation of risk and action	Hold a cross-functional prioritisation workshop to review our risk assessment findings, identify the most impactful areas for action, and update our modern slavery risk register.
Embed modern slavery risk considerations into commercial practice	Review procurement and contracting practices in high-risk categories (e.g. marketing, offshore services) to identify whether timelines, pricing pressures, or sourcing structures may contribute to modern slavery risk - and update commercial guidance accordingly.
Tabletop exercise for managing modern slavery incidents	Building on the success of our previous tabletop exercise, we will involve more internal stakeholders in further tabletop exercises that consider a range of modern slavery issues, with the aim of further increasing knowledge and awareness of modern slavery risks and processes across our businesses.
Define supplier grievance and remedy expectations	Establish clear expectations for supplier-side grievance mechanisms and develop a process to support or cooperate in remediation where CAR Group may contribute to harm. This may include piloting grievance system assessments or reviewing the quality and accessibility of existing supplier processes.
Continuous improvement	Stay open to more ideas that enhance our modern slavery response.

The purpose of this Statement is to provide general information only as required by the Modern Slavery Act and is correct as at the date of publication.

This joint Modern Slavery Statement was approved by the Board of CAR Group Ltd, in accordance with the Modern Slavery Act 2018 (Cth).

Signed for and on behalf of all reporting entities,

Pat O'Sullivan

Non-Executive Chair
CAR Group Ltd

Date: 7 August 2025

Cameron McIntyre

Managing Director and
Chief Executive Officer
CAR Group Ltd