

MODERN SLAVERY POLICY

1. Purpose

CAR Group Limited ("CAR Group" or "the Group") is committed to complying with its obligations under the Modern Slavery Act 2018 (Cth) ("the Act") and other applicable modern slavery laws; taking meaningful actions to mitigate the risks of modern slavery in its operations and supply chains; and respecting and supporting human rights (as further described in CAR Group's Human Rights Policy). This policy describes CAR Group's approach to meeting these commitments and is underpinned by CAR Group's Code of Conduct and Human Rights Policy.

2. Scope

This policy applies to all CAR Group team members, directors, officers and contractors working for CAR Group or any of its subsidiaries globally.

3. Background, obligations and commitments

Modern slavery refers to situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery may include:

- Human trafficking
- Slavery
- Forced labour
- Debt bondage
- Forced marriage
- Child labour

CAR Group's commitment to responsible business practices is fundamental to maintaining trust in our platforms and the people behind them. By proactively managing modern slavery risks, we:

- Protect people and uphold human rights across our operations and supply chains.
- Meet the expectations of our customers, team members, and communities.

- Reduce legal and reputational risk.
- Strengthen the resilience and integrity of our business.

As a 'reporting entity' under the Act, CAR Group will submit an annual Modern Slavery Statement describing the steps taken to mitigate modern slavery risks in our operations and supply chains. Our obligations include:

- Identifying risks of modern slavery in our global operations and supply chains.
- Taking actions to assess and mitigate those risks.
- Assessing the effectiveness of our actions.

This statement is published on the [Modern Slavery Statements Register](#) and is also made available on the [CAR Group shareholder website](#).

4. Risk profile

As an operator of online marketplaces and platforms with most team members engaged in office-based roles in countries with strong labour protections, the risk of modern slavery within CAR Group's direct operations is considered low. However, we have identified several areas of elevated risk, particularly within our supply chain:

- Advertising and marketing (digital/social media)
- Car maintenance and repair services
- Information and communications technology (ICT) hardware, equipment, and services
- Data processing and outsourced services
- Travel and accommodation

Risks may arise from the use of offshore content producers, third-party agencies, informal contracts, poor payment terms, and lack of labour protections. In ICT, upstream manufacturing and raw material sourcing (e.g., electronics, minerals) present heightened risks due to known sector and geography factors.

5. Marketplace obligations

CAR Group aspires to adopt a consistent approach to managing modern slavery risks across its global business. However, it is acknowledged that a range of factors may make it impractical

to adopt a uniform approach across CAR Group's global operations due to factors including decentralised procurement processes across CAR Group and suppliers' lack of familiarity with modern slavery due diligence processes in some jurisdictions, especially in countries where there is no comparable modern slavery legislation.

To empower CAR Group subsidiary entities to adopt processes that are appropriate to their local operating environment, whilst also ensuring CAR Group mitigates the risks of modern slavery in its operations and supply chains globally, all Group entities are required to adhere to the following baseline standards:

- a) Each key marketplace must appoint a designated modern slavery champion. The champion is the key liaison with the CAR Group Sustainability team and oversees the implementation of modern slavery risk management processes within their marketplace and its subsidiaries. They will typically be drawn from the local legal, procurement or finance team that manages contracts and supplier onboarding, to ensure alignment with local operational practices.
- b) The champion approves modern slavery risk decisions for supplier engagements in their marketplace, documents any residual risk acceptance (in consultation with their local leadership team or CAR Group's Sustainability team where needed), and ensures appropriate escalation where risks cannot be mitigated. Unresolved or significant risks must be escalated to an appropriate Global Leadership Team member.
- c) Assess modern slavery risks posed by its operations.
- d) Assess modern slavery risks posed by existing and new suppliers.
- e) Ask new suppliers to commit to either the CAR Group Supplier Code of Conduct or a similar Code of Conduct appropriate to the local jurisdiction prior to engagement.
- f) Seek appropriate contractual assurances from suppliers (e.g. that the supplier will notify CAR Group of any identified instances of modern slavery in its operations or supply chains).
- g) Immediately notify the Group of any actual or suspected instances of modern slavery in the entity's operation or supply chains. Notification can be done directly to the Sustainability team sustainability@cargroup.com, or by using one of the avenues outlined in CAR Group's *See Something? Say Something!* policy.

- h) Where modern slavery is identified or reasonably suspected, take a victim-centred approach to remediation — prioritising the safety, wellbeing and rights of affected people — in consultation with the entity's local team that manages contracts and supplier onboarding and CAR Group's Sustainability team. Remediation may include supporting access to appropriate services, working with suppliers to address the cause, and, where remediation is not possible or the supplier is unwilling to act, responsible disengagement.
- i) Assess any new subsidiary companies acquired or established within their region for modern slavery risks in their operations and supply chain. Entities must ensure that these new subsidiaries fully adopt and implement the baseline standards listed above, thereby embedding effective risk management and compliance processes from the outset. This approach helps to maintain a consistent and robust framework for identifying and addressing modern slavery risks across all areas of the business.

Detailed procedures, templates and tools to support marketplaces (including supplier screening, risk assessment, escalation and recordkeeping) are set out in the Modern Slavery How-to Guide.

6. Managing risks

- a) Operational risks: CAR Group recognises that while the risk of modern slavery within our direct operations is low, certain arrangements such as offshore business services or contingent workforce providers may present higher risks. To address these:
 - All team members, including those engaged via third-party or offshore providers, are required to comply with applicable laws and CAR Group policies, including the local policies relevant to their marketplace.
 - Modern slavery awareness training is provided to ensure all team members can identify and report risks.
 - When engaging new offshore or contingent workforce providers, business units must consult their modern slavery champion early in the process to ensure appropriate risk assessment and onboarding.
- b) Supply chain risks: CAR Group assesses modern slavery risks for all suppliers, with a focus on those operating in high-risk sectors or geographies. Modern slavery risk is

not necessarily proportionate to the value of a supplier engagement. Due diligence must be completed before entering into or renewing a supplier engagement where the supplier, goods/services or delivery model indicates higher risk (for example, high-risk sectors or geographies, outsourced/offshore service delivery, labour hire or subcontracting). Our approach includes:

- Requesting suppliers to complete a modern slavery risk questionnaire where practical.
- Where a questionnaire is not feasible, assessing risk through public statements, supplier policies, or informal discussions.
- High-risk suppliers may be subject to additional actions such as additional contractual requirements, enhanced monitoring, supplier training and capability uplift, investigation of relevant subcontractors (where proportionate), restricting the scope of engagement, or alternative sourcing where risks cannot be mitigated.

Step-by-step guidance (including when questionnaires are required vs when alternative checks are acceptable, and how to document decisions) is provided in the Modern Slavery How-to Guide.

7. Responsibilities for managing modern slavery risks

All CAR Group team members have a role to play in managing modern slavery risks across our business. Specific responsibilities are defined below:

Role	Responsibility
All CAR Group team members	- Complying with this policy. - Completing any modern slavery training designated to them within the required timeframes. - Reporting actual or suspected instances of modern slavery in accordance with this policy.

Individual marketplaces and their modern slavery champions	- Implementing the baseline standards outlined in the “Marketplace obligations” section of this policy, including approving supplier modern slavery risk decisions within the marketplace, maintaining appropriate records of assessments/approvals, and promptly escalating and reporting actual or suspected instances of modern slavery. - Provide an annual update to support CAR Group’s Modern Slavery Statement, including key risks identified, actions taken, incidents (if any), and effectiveness indicators. - Ensuring that any modern slavery training that CAR Group requests is circulated to relevant teams within the marketplace and completed within required timeframes, and confirm completion to the Sustainability team.
CAR Group Sustainability team	- Preparing CAR Group’s annual Modern Slavery Statement. - Providing guidance and updates about modern slavery matters to CAR Group’s Sustainability Committee and business units as appropriate. - Managing any identified instances of modern slavery.
CAR Group Limited Board	- Approval of each annual Modern Slavery Statement. - Strategic direction and oversight of modern slavery compliance activities.

8. Raising concerns – *See Something? Say Something!*

CAR Group’s *See Something? Say Something!* policy outlines the avenues through which our team members (past and current), directors, contractors, customers, suppliers or other associates of CAR Group can raise matters, including anonymously. Matters raised under the *See Something? Say Something!* policy will be treated sensitively, and confidentiality will be maintained as much as possible within the constraints of needing to investigate the matter raised.



CAR Group's *See Something? Say Something!* policy is available on our [shareholder website](#).

Document and Version Control

Version	Date
2.0	May 2026