Modern Slavery Statement 2026

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 2025 to 30 June 2026 (FY26). 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 140 and 141 of CAR Group's FY26 Annual Report.

Consultation

In preparing this Statement, we engaged with a range of internal and external stakeholders, which included feedback from external experts. 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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Chair and CEO statement

The trust people place in our marketplaces depends on the standards we hold ourselves and our partners to. Respecting human rights and working to eliminate modern slavery is central to how we earn that trust, in every market where we operate.

This Statement sets out the progress we made in FY26. During the year we refreshed our Modern Slavery Policy, introduced a Modern Slavery How-To Guide to give our teams practical guidance, and strengthened our Supplier Code of Conduct, including adopting the Employer Pays Principle in full and asking suppliers to map their own supply chains where they can. We introduced a payroll verification process in Australia to help confirm our people receive and control their own wages, and we made it easier for team members across our sites, including those engaged by our service providers, to raise a concern.

We are realistic about this work. Most of our modern slavery risk sits beyond our direct suppliers, in the wider networks they rely on, where visibility is hardest to achieve. We have identified where that risk is concentrated, and our focus now is on the areas where we have both significant spend and real influence. The commitments in this Statement reflect that focus: deeper engagement with our suppliers, a stronger procurement capability, and testing how we would respond if an issue were ever identified.

There is more to do, and meaningful change takes time, transparency and a willingness to keep improving. We are committed to that, and to reporting on our progress openly each year.

Pat O'Sullivan
Non-Executive Chair,
CAR Group Ltd

William Elliott
Managing Director and CEO
CAR Group Ltd

Our FY26 highlights

Refreshed our Modern Slavery Policy.

Strengthened our Supplier Code of Conduct (SCoC) to enhance protections for worker contracts and labour hire practices so workers are never charged a fee to get a job with us or our suppliers, with any fees found repaid in full.

Developed and introduced a new Modern Slavery How-To Guide, a practical resource that helps our teams recognise and respond to modern slavery risks across our operations and supply chains.

Uplifted our commitment to transparency by publishing our Modern Slavery Policy and SCoC on our shareholder website.

97% of Australian team members completed modern slavery training.

100% of Australian employees' bank account names verified to guard against wage misappropriation, with all 12 flagged discrepancies reviewed and cleared.

306 new suppliers assessed in line with our onboarding processes.

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 2,900 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, China, Thailand and Malaysia.

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.

Where we operate

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

Our culture

CAR Group's culture is 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.

This year we launched a new set of values for the whole Group. To connect our marketplaces around the world, we wanted to be clear about what we stand for and how we work together every day. Built by our Global Leadership Team, our values reflect what we expect from every person in the Group.

Customer obsessed

Every decision starts with the customer. Does this make their experience better?

Curious

We question assumptions, seek out new ideas, and reward experimentation – including when it fails.

Connected

We show up. We're fully present. We collaborate and hold each other accountable.

These values are the common thread between our marketplaces, connecting our people across geographies, languages and cultures. They are embedded in how we lead, work and set strategy, keeping our culture a living part of CAR Group's identity as we grow globally. They also guide our behaviours and decisions, and shape how we run our businesses, including how we address modern slavery.

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.

Our operations and supply chain

Our workforce

Across our marketplaces, we employ a highly skilled team with most roles focused on technology development, product, design, data analytics, strategy, marketing, advertising, and corporate services. We employ our people in line with the employment laws and regulatory frameworks of the countries in which they work for us, and they receive the protections those frameworks provide.

We invest in creating workplaces where team members are heard, can contribute meaningfully, and have the opportunity to grow. Our commitment to fair and transparent employment practices is foundational to how we approach human rights, both within our own walls and across the broader supply chain.

The table below reflects our directly employed workforce. In addition to these employees, we engage contractors (through direct engagement or third-party agencies) across our marketplaces to support our operations as required throughout the year. While these workers are not part of our core employment model, they form part of our extended workforce. We extend the same human rights and modern slavery expectations and support to these workers, as well as to any agency that supplies them, consistent with our approach across the broader supply chain.

Table 1. CAR Group's workforce

Employment status (at 30 June 2026)	Employees
Full time	**2,896**
Permanent[1]	2,739
Fixed term[2]	157
Part time	**44**
Permanent	39
Fixed term	5
Casual[3]	**17**
Total CAR Group headcount	**2,957**

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.

Our operations

CAR Group operates leading online vehicle marketplaces that support a wide range of customers including private buyers and sellers, dealers, and Original Equipment Manufacturers (OEMs). 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 Areas	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 per listing
	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
Trust 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

Our supply chain

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

In this Statement, we use the following terminology to describe our supply chain:

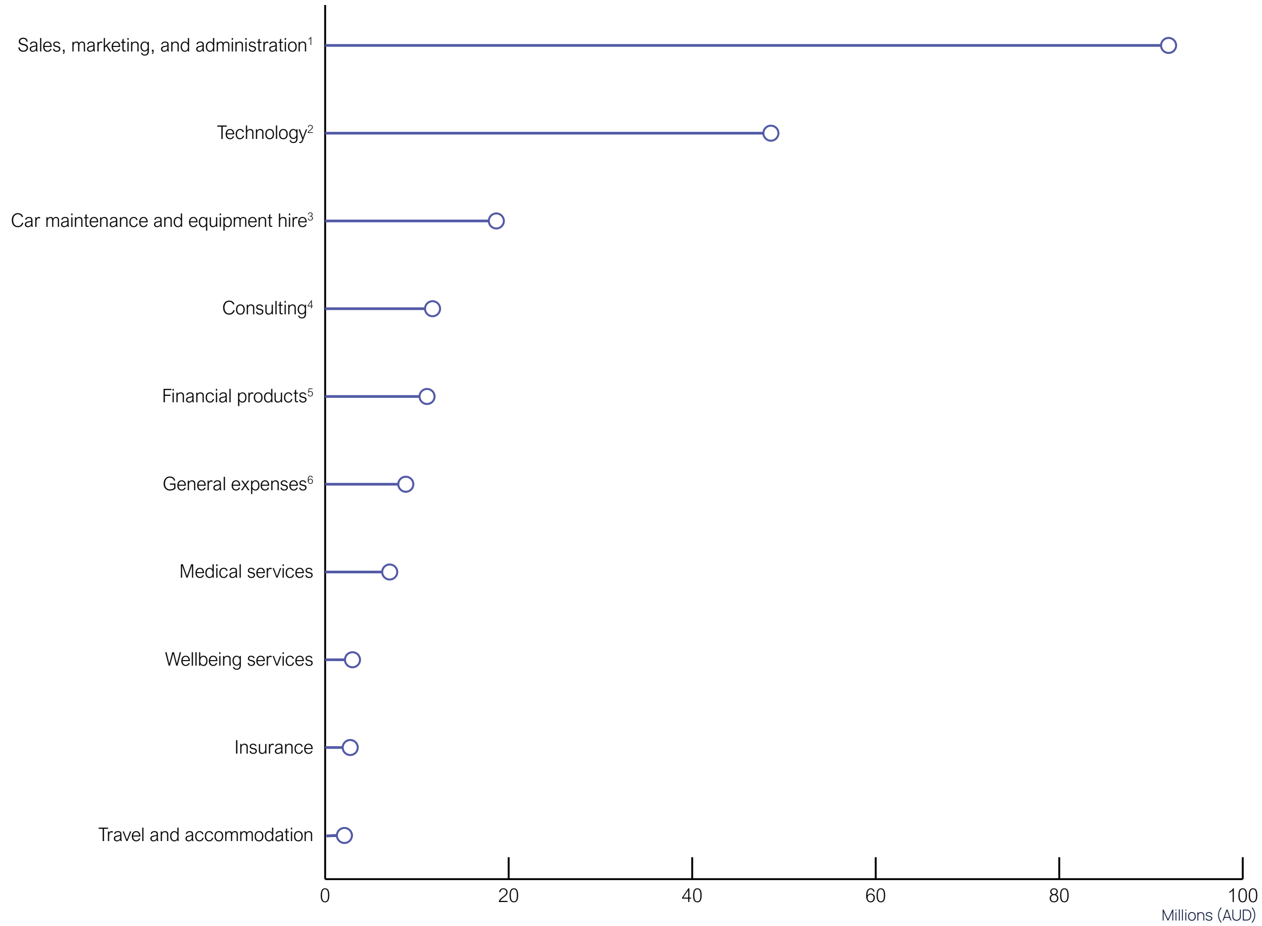
Tier 1 (direct) suppliers: Businesses we contract and procure from directly. This includes both ongoing suppliers and those engaged in one-off transactions across all CAR Group markets. Our Tier 1 suppliers provide a range of products and services, including technology and software, professional services, marketing and media, facilities management, and operational support.

Tier 2+ (indirect) suppliers: Businesses that supply goods or services to our Tier 1 suppliers. We do not typically have a direct contractual relationship with these businesses; however, their practices can affect the standards we expect our Tier 1 suppliers to uphold.

Based on 2025 data, we engaged with over 10,000 Tier 1 suppliers across our global operations. Our total procurement spend of A$274.9m spans 26 countries, with the majority concentrated in Brazil, Australia, and the United States, and smaller portions in South Korea, India, and Ireland.

Our Tier 1 supply chain can be described in four broad segments: sales, marketing and administration; technology; consulting and professional services; and industry-specific goods and services such as financial products and vehicle maintenance and equipment. Together these segments account for approximately 70% of our direct procurement spend across the countries shown in Figure 3.

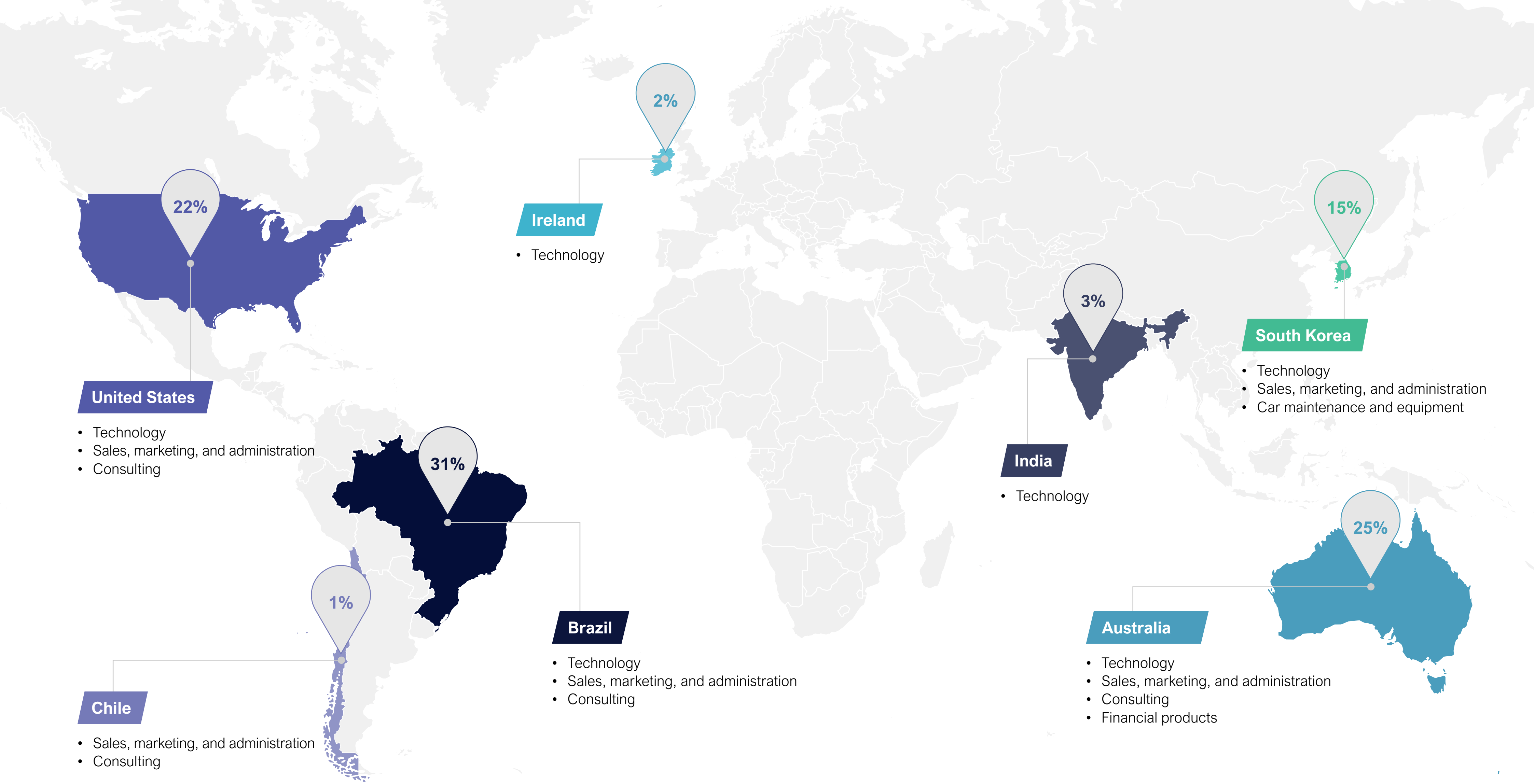
Figure 2. Top 10 categories by spend



1. Sales, marketing, and administration 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.

Our operations and supply chain continued

Figure 3. Spend by country and key categories



1. Only countries with spend above 1% of total are shown. Percentages may not sum to 100% due to rounding.

Identifying our modern slavery risks

Modern slavery is an umbrella term covering serious exploitation of people through force, fraud, or coercion. Two forms are particularly relevant to CAR Group's risk profile:

- **Forced labour:** Any work or service exacted from a person under threat of penalty and for which that person has not offered themselves voluntarily. This includes situations where a worker cannot leave without facing punishment, debt, or harm to themselves or their family.
- **Bonded labour:** A form of forced labour in which a person is compelled to work to repay a debt – often recruitment fees or costs inflated by an employer or recruiter. The debt may be impossible to repay in practice, trapping workers in ongoing exploitation.

These forms of modern slavery were identified as particularly relevant through our risk assessment process, which considers factors such as our supply chain structure, sourcing locations, labour practices in our industry, and insights from external risk indices and stakeholder engagement. For further detail on our risk assessment process, see the 'Risks in our supply chain' section on page 11.

Risks in our operations

CAR Group operates digital marketplaces and online platforms, underpinned by a skilled, professional workforce. As detailed earlier in the 'Our workforce' section on page 6, 94% of our team members are employed on direct, permanent contracts in countries with established labour protections and regulatory frameworks – including Australia, the United States, Brazil, South Korea, and Chile. The structural characteristics of our workforce mean that the risk of modern slavery within our direct operations is low overall.

That said, operational risk is not uniform. We have identified three areas where there is potential for elevated exposure, and we actively consider these in our governance and procurement decisions:

- **Operations in higher-risk jurisdictions:** A small team operates in Malaysia, China, and Thailand as part of our RedBook data businesses. These roles are managed from Australia and follow consistent Group employment policies and governance practices. We remain alert to the documented risks of deceptive recruitment practices and recruitment fees charged to migrant workers – risks that are particularly prevalent in Malaysia and Thailand. Our employment arrangements in these countries are subject to oversight by Australian management and are covered by our SCoC where third parties are involved.
- **Offshore and outsourced business services:** When engaging third-party providers for functions such as customer service, data processing, and content operations, we maintain active vigilance for modern slavery risk indicators. These include: contracts with offshore business process outsourcing or content moderation providers operating in higher-risk countries; pricing structures that suggest reliance on low-wage or informal labour; lack of transparency on subcontracting arrangements; use of digital crowd work platforms with limited oversight; and workers classified as contractors without access to standard labour protections. Countries where these risks are documented as elevated and where our supply chain may have exposure include India, the Philippines, and Malaysia – factors we consider when assessing and selecting suppliers in these categories.
- **Contingent and on-site service arrangements:** We engage contingent labour predominantly in skilled professional roles, which carries lower risk. We also use on-site service providers – including cleaning and facilities services – where labour hire and subcontracting are more common and working conditions can be less visible. These arrangements warrant ongoing monitoring, particularly where third-party agencies are responsible for worker recruitment.

The specific controls, policies, and due diligence processes we have in place to manage each of these risk areas are outlined in the 'Managing risks in our operations' section on page 16.

Risks in our supply chain

In 2025, CAR Group engaged Edge Impact – an independent consultancy specialising in social risk and sustainability – to conduct a structured modern slavery risk assessment across our supply chain. The assessment reviewed procurement spend across 357 categories and 26 countries, evaluating each category against internationally recognised risk indicators and data sources including EXIOBASE (input-output life cycle database), the Global Slavery Index, the Social Hotspot Database, and the Child Rights Index. The findings of this assessment continue to inform our risk profile in FY26 and guide where we prioritise due diligence and controls across our operations and supply chain.

Findings were assessed against the UN Guiding Principles on Business and Human Rights (UNGPs) framework to understand where CAR Group may cause, contribute to, or be directly linked to modern slavery risk. The assessment also considered our potential influence over identified risks – that is, how much leverage CAR Group realistically has to address conditions at each tier of the supply chain.

Risk is reported as inherent risk – the structural level of risk associated with a spend category or geography before any mitigation actions are applied. Inherent risk does not imply wrongdoing by any specific supplier, rather it reflects conditions in supply chains more broadly. How we manage and mitigate these risks is described later in the 'Managing risks in our supply chain' section on page 19.

Five of our top 10 categories by spend were identified as high or very high inherent risk, representing approximately 61% of total procurement spend, as shown in Table 2. Risk across our supply chain is driven by three common factors:

- **Deceptive recruitment and labour exploitation:** Deceptive recruitment practices, debt bondage, and exploitation of migrant workers – particularly in outsourced services, on-site labour, and vehicle certification in South Korea.
- **Opaque subcontracting and multi-tier supply chains:** Reduced visibility of working conditions where supply chains extend beyond direct suppliers, including use of digital platforms, agencies, and subcontractors in marketing, information and communications technology (ICT), and data services.
- **Country- and sector-specific risk exposure:** Structural conditions in specific countries and sectors – including weak labour protections and documented exploitation risks – that heighten the likelihood of modern slavery regardless of individual supplier policies.

Table 2. CAR Group inherent risk by top 10 categories of spend

Spend category	Inherent risk rating
Sales, marketing, and administration	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

Our key risk areas

Table 3 sets out our five highest-risk procurement categories. The risks shown are inherent, industry-level risks that may be present globally based on industry practices, supply chain structures, and known vulnerabilities. This analysis helps us prioritise where further due diligence, controls, or mitigations may be warranted, with the specific controls in place described in the 'Managing risks in our supply chain' section on page 19.

Table 3. CAR Group's highest-risk procurement categories and key modern slavery risks

Spend category & risk rating	Key modern slavery risks	Geographic exposure	CAR Group linkage, potential influence & UNGP framing	How are we managing this
Sales, marketing and administration **Very high**	Offshore content producers, digital freelancers, and agency labour used through third-party platforms carry risks of informal contracts, wage underpayment, excessive hours, and deceptive recruitment. Finance and administration and trading relationships in offshore markets carry similar risks. Merchandise and branded goods, while a small portion of spend, carry elevated inherent risk due to garment and textile supply chain origins.	Tier 1: Australia, South Korea, Brazil, United States, Chile, China, Malaysia, Thailand. Potential (Tier 2): Philippines, India (agency and platform subcontracting).	May be directly linked (UNGP) through marketing agency, finance and administration, and trading relationships. High influence at Tier 1-2 through contract terms and disclosure requirements; limited at Tier 3. May contribute where procurement incentivises lowest-cost delivery.	SCoC; request to add a modern slavery clause to supplier contracts where practicable, and where these do not already exist; disclosure requirements for offshore subcontracting; supplier onboarding questionnaire (SOQ) requires confirmation that all workers (employees and contractors) engaged by the Contracting Entity have a written employment agreement in a language that they understand and will auto-flag a 'no' response to this question, triggering review before engagement; SOQ auto-flags labour hire services, professional services predominantly from outside of Australia, garments and branded merchandise as high-risk categories, triggering review before engagement.
Technology **Very high**	Forced and child labour in raw material extraction (cobalt, tin, tungsten) and exploitative practices in electronics assembly, including bonded migrant labour and recruitment debt. Risk is concentrated in Tier 2-3 where traceability is limited. Software, data processing, and outsourced services carry risks from IT contractors and crowd work platforms operating under informal or opaque contracts, with wage underpayment and excessive hours documented across offshore delivery.	Tier 1: Australia, South Korea, Brazil, United States, Chile, China, Malaysia, Thailand, India. Potential (Tier 2-3): Vietnam (electronics assembly, software subcontracting); Democratic Republic of the Congo (DRC), Bolivia, Indonesia (raw material extraction); Philippines, Kenya, Pakistan, Ukraine (software vendor and data services subcontracting).	May be directly linked (UNGP) through procurement of ICT hardware, software, data processing, and outsourced services. Moderate influence at Tier 1 through supplier contracts; low at Tier 2-3 where manufacturing and subcontracting are less visible. Potential for contribution depending on contracting and commercial practices.	SCoC; request to add a modern slavery clause to supplier contracts where practicable, and where these do not already exist; prioritise suppliers with published modern slavery statements and sourcing disclosures; we seek contractual disclosure of labour sourcing and subcontracting chains where practicable; SOQ auto-flags labour hire services, professional services predominantly from outside of Australia, electronics and computer hardware as high-risk categories, triggering review before engagement. Conflict minerals represent a significant modern slavery risk within electronics supply chains. For these specifically, we address the risk through our SCoC which includes a Responsible Sourcing of Material clause, our due diligence processes, including supplier risk assessments, alignment with international standards (such as OECD guidance), and efforts to improve transparency and traceability in Tier 2 and Tier 3 sourcing.

Spend category & risk rating	Key modern slavery risks	Geographic exposure	CAR Group linkage, potential influence & UNGP framing	How are we managing this
Car maintenance and equipment hire Very high	Vehicle inspection, certification, and maintenance providers in South Korea may use subcontracted or agency labour, including migrant workers, with documented risks of wage underpayment, excessive hours, debt bondage, and deceptive recruitment. Equipment and plant hire providers using casual or labour-hire workforces carry similar risks.	Tier 1: Australia, South Korea.	May be directly linked (UNGP) through contracts with vehicle certification, maintenance, and equipment hire providers. High influence at Tier 1 through contractual labour standards. May contribute where procurement involves third-party labour hire.	SCoC; in Australia, SOQ auto-flags labour hire services as a high-risk category, triggering review before engagement. Encar's supplier questionnaire is modelled on the Australian SOQ and asks suppliers whether they outsource part or all of the work involved in supplying products or services to Encar to other suppliers or subcontractors. Encar engages a small number of onshore subcontractors in South Korea – these arrangements and the controls applied to them are described in the 'Managing risks in our operations' section on page 17.
Wellbeing services High	Providers of employee wellbeing services, including occupational health, employee assistance programs, and food services, may use subcontracted or agency workers. In South Korea and Brazil, welfare and catering providers are known to rely on temporary or outsourced workforces where wage underpayment and excessive hours are known risk factors.	Tier 1: Australia, South Korea, Brazil, United States, Chile.	May be directly linked (UNGP) through contracts with employee welfare and wellbeing service providers. Moderate influence at Tier 1 through procurement terms and supplier engagement.	SCoC; request to add a modern slavery clause to supplier contracts where practicable, and where these do not already exist; SOQ auto-flags office services (e.g. catering, security, maintenance, cleaning) as a high-risk category, triggering review before engagement.
Travel and accommodation Very high	Hotels, flights, and transport providers may rely on subcontracted cleaning, hospitality, and maintenance workers in jurisdictions with weaker labour protections. Risks include debt-bonded migrant labour, wage underpayment, and poor conditions for subcontracted staff, with opaque subcontracting chains reducing visibility.	Tier 1: Australia, South Korea, Brazil, United States, Chile, Thailand, Malaysia, China.	May be directly linked (UNGP) through corporate travel and accommodation providers. High influence at Tier 1 via preferred provider arrangements and travel policy; low at Tier 2-3 where hospitality subcontractors and cleaning services are involved. May contribute through use of lowest-cost providers without adequate labour checks.	SCoC; request to add a modern slavery clause to supplier contracts where practicable, and where these do not already exist. In FY26 we commenced a changeover of our Australian corporate travel provider to one whose booking platforms give us granular, real-time visibility over who is booking what, where, and with which suppliers. This enables us to apply travel controls and strengthen oversight of accommodation and transport providers.

1. Source: Edge Impact Modern Slavery Risk Assessment, June 2025; Global Slavery Index; Trafficking in Persons Report. Inherent risk ratings reflect structural conditions in supply chains and sourcing geographies – they do not indicate wrongdoing by any specific supplier.

Addressing our modern slavery risks

Our governance framework

CAR Group manages modern slavery risk through a structured governance framework that operates across all of our marketplaces. The framework is built around clear policy commitments, defined responsibilities, and the tools our people need to identify and respond to risk in practice.

Key components of our governance structure that support modern slavery compliance are shown in Table 4. For the first time this year, our Modern Slavery Policy and SCoC are publicly available on our shareholder website, where all of CAR Group's policies can be found: cargroup.com/charters

Figure 4. Governance roles supporting modern slavery compliance

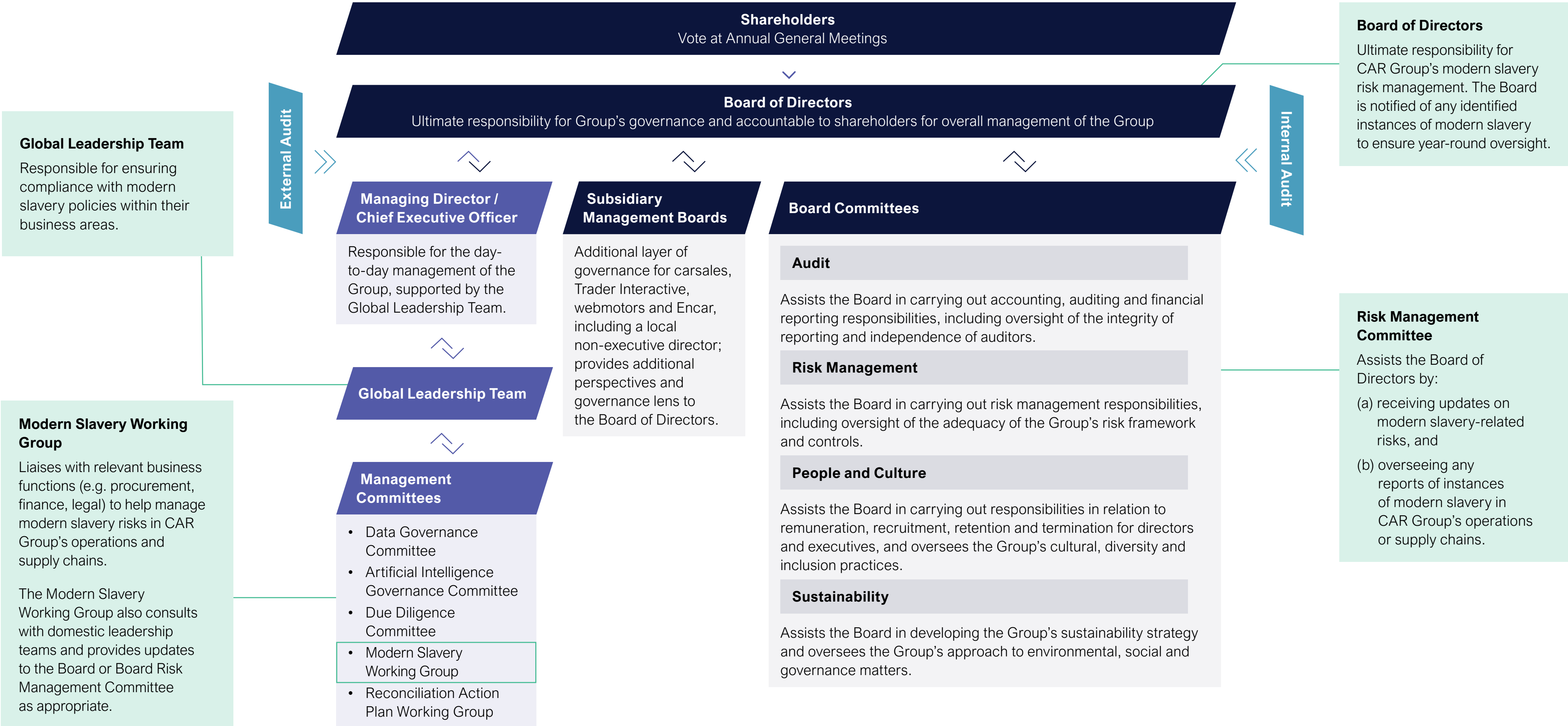


Table 4. CAR Group modern slavery governance framework

Governance mechanism	What it does
Modern Slavery Policy	Principles-focused policy setting out CAR Group's modern slavery commitments, risk profile, and the baseline standards all Group entities must meet, including appointing a Modern Slavery Champion in each key marketplace. Applies to all team members, directors, officers, and contractors globally. This policy was updated in FY26 to make our commitments clearer and more accessible.
Modern Slavery How-To Guide	New in FY26. Step-by-step operational guidance for Modern Slavery Champions and team members involved in procurement, supplier onboarding, and contract management. Covers operational and supplier risk assessment, incident response and remediation, management of newly acquired businesses, record-keeping, and awareness of modern slavery laws beyond Australia.
Code of Conduct	Sets the ethical standards expected of all team members, including compliance with applicable laws, fair employment conditions and working hours, a zero-tolerance approach to discrimination and harassment, and a safe workplace for team members, contractors, and visitors.
Supplier Code of Conduct (SCoC)	Sets the minimum standards CAR Group requires of all suppliers. Based on the Responsible Business Alliance Code of Conduct 8.0, with reference to the UN Universal Declaration of Human Rights, International Labour Organization (ILO) Fundamental Conventions, and OECD Guidelines for Multinational Enterprises. Updated in FY26, key changes in this version include: a new dedicated section on Migrant and Foreign Workers implementing the ILO Employer Pays Principle in full; an explicit obligation for suppliers to notify CAR Group if modern slavery is identified in their operations or supply chains and to cooperate in remediation; a new requirement for suppliers to map their own supply chains to assess modern slavery and labour rights risk at Tier 2 and beyond; and a requirement for suppliers to extend equivalent standards to their own supply chains.
Human Rights Policy	Sets out CAR Group's commitment to respecting human rights across our operations, in line with the UN Guiding Principles on Business and Human Rights.
Procurement Framework	Embeds modern slavery risk controls into procurement and supplier onboarding, including completion of the SOQ and acceptance of the SCoC.
Risk Management Policy	Defines how CAR Group identifies, assesses, and manages risk across the Group, including responsibilities, risk assessment methods, mitigation strategies, and compliance measures that support modern slavery risk management.
***See Something? Say Something!* Policy**	CAR Group's grievance and speak-up policy (replacing the former Whistleblower Policy), giving team members, contractors, suppliers, and other stakeholders confidential and anonymous channels to raise concerns. A *See Something? Say Something!* clause is embedded in key global policies, including the Code of Conduct and Human Rights Policy.
Anti-Bribery and Corruption Policy	Sets out the principles and controls to prevent, detect, and respond to bribery and corruption risks, and to comply with anti-bribery and corruption laws in the jurisdictions where CAR Group operates.

Addressing our modern slavery risks continued

Managing risks in our operations

In the ‘Risks in our operations’ section on page 10, we identified three areas of elevated risk within our direct operations. The following describes how each is managed.

Operations in higher-risk jurisdictions

Our RedBook operations in Malaysia, China, and Thailand employ a small number of locally engaged team members in digital and data roles. All Group employment policies apply consistently across these markets, with day-to-day management oversight maintained from Australia. Local employment contracts meet or exceed applicable national law requirements and remuneration reviews are conducted at least annually. All team members are direct employees of RedBook; no contracting arrangements are in place.

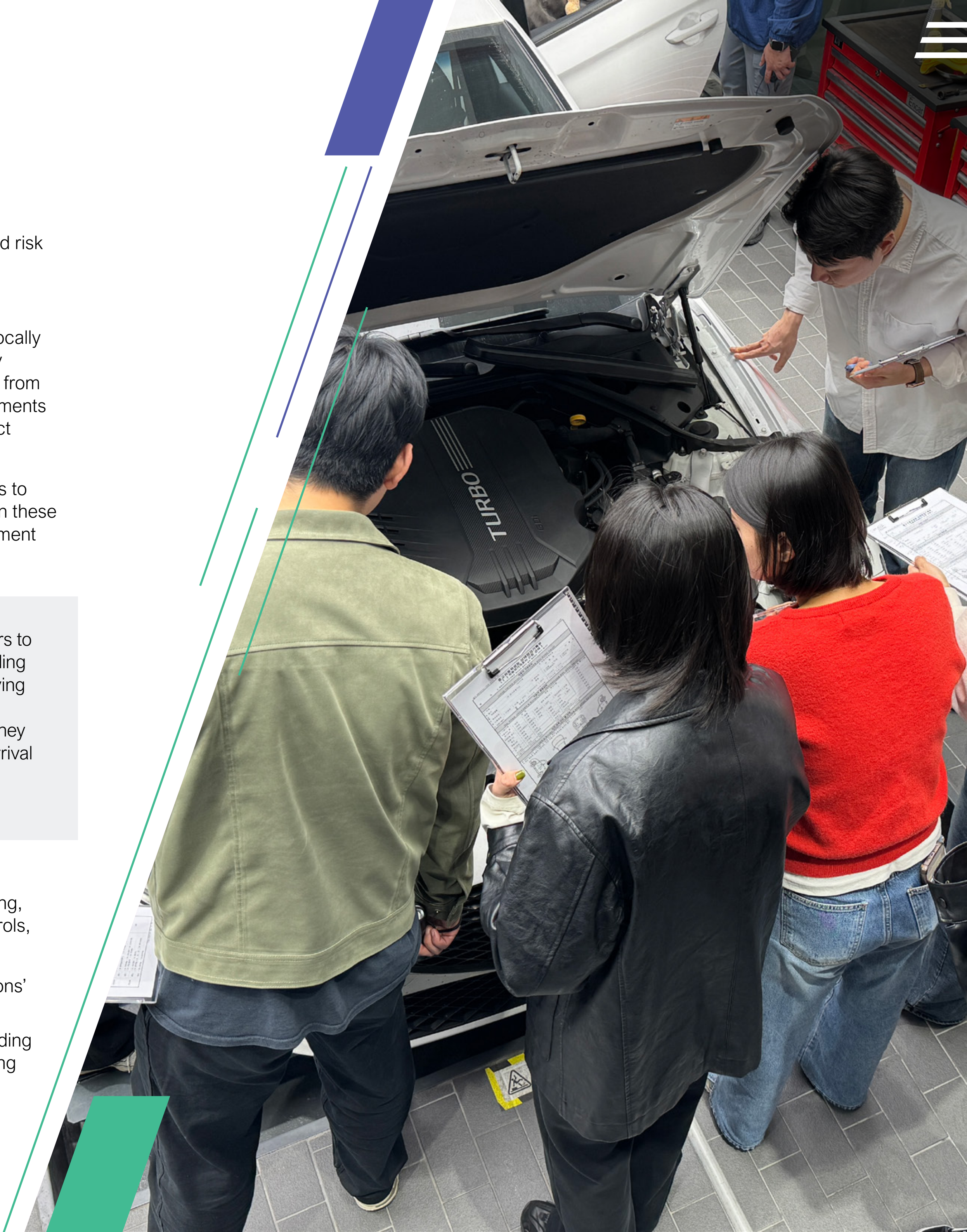
Malaysia and Thailand carry documented risks around the charging of recruitment fees to migrant workers – a practice that can trap workers in debt bondage. When recruiting in these countries, we aim to hire directly from the local community rather than through recruitment agencies or labour hire services, which limits our exposure to recruitment-fee risk.

> Our SCoC was updated in FY26 to explicitly prohibit suppliers from requiring workers to pay recruitment fees or related costs at any stage of the recruitment process, including fees charged in workers’ home countries. Where any such fees are identified as having been charged, suppliers are required to repay these to the worker within 90 days. Employment agreements must be provided in the worker’s native language before they depart their country of origin, and no changes to contract terms are permitted on arrival unless they improve the worker’s conditions. These requirements apply to any third parties involved in labour hire for our operations in these markets.

Offshore and outsourced business services

When engaging third-party providers for data processing, business process outsourcing, customer service, or content operations, we apply the Group’s standard supplier controls, including the SOQ, the SCoC, and contract requirements. In addition:

- We monitor for the modern slavery risk indicators set out in the ‘Risks in our operations’ section on page 10.
- Suppliers in high-risk countries for data processing and outsourced services – including India, Malaysia, the Philippines, and Kenya – are subject to heightened scrutiny during onboarding and contract review.



Contingent and on-site service arrangements

Contractor arrangements

Where our marketplaces engage offshore and international contractors, they do so either through direct engagement or via intermediary partners to ensure compliance with local employment laws and regulations, particularly in markets where they do not have a legal entity. Engaging through established intermediaries reduces modern slavery risk by ensuring workers are employed under compliant arrangements with appropriate remuneration and oversight.

carsales (Australia)

carsales primarily use two models: an Employer of Record (EOR) arrangement, or engagement through a contracting agency.

Remote is carsales' EOR provider. In this model, Remote acts as the legal employer and manages the full employment lifecycle, from onboarding through to exit, taking on responsibility for compliance with local employment obligations and relevant regulatory standards.

For agency engagements, carsales partner with contracting agencies that are carefully vetted for alignment with our ways of working before they are engaged. This vetting includes detailed internal interviews with prospective providers, due diligence on their operations and labour practices, and, for Australian providers, a check of the Labour Hire Authority's Labour Hire Licence Register to confirm they hold a current, valid labour hire licence. Our agency relationships are long-standing and were established through direct procurement engagement, prior working relationships, or existing connections elsewhere in the Group. Where possible, we also aim to partner with large, well-established providers whose scale and reputation support more mature labour and compliance practices. We have also visited the offshore premises of one of our providers in person, giving us direct insight into their operations and working environment. Contractors engaged through these agencies operate as integrated members of our teams. Remuneration is aligned to experience and market considerations and is reviewed annually, typically in line with contract renewal cycles.

Trader Interactive (United States)

Trader Interactive use a contracting agency model, sourcing contractors through established international agencies, including one also engaged by carsales. Each agency's employment practices and operating standards are assessed during the due diligence phase before any engagement begins. Contractors work alongside Trader Interactive's employees.

webmotors (Brazil)

webmotors also engage a small number of contractors through a contracting agency model. Their local Procurement and Legal teams assess these suppliers through their supplier due-diligence platform and confirm they comply with local labour laws and that contractors are paid appropriately.

Encar (South Korea)

Encar engages three independent Korean companies to support its marketplace operations, covering on-site vehicle diagnosis and evaluation, vehicle transport, and document guidance for non-face-to-face sales. All workers are based in South Korea, with no work performed offshore. In each arrangement, the provider is the legal employer, responsible for recruitment, wages, insurance, and supervision, while Encar defines the scope of services and monitors delivery through a named business owner.

Encar assures worker welfare and fair pay through contracts requiring compliance with Korean labour law (including minimum wage and national social insurance), quarterly compliance reviews by its People and Culture team, a named business sponsor for each relationship, and remediation of any gaps at contract renewal. Its most recent review reported no wage arrears or industrial accidents over the past three years.

Addressing our modern slavery risks continued

On-site service arrangements

On-site service providers – including cleaning and waste management contractors – represent an area of elevated risk given the prevalence of subcontracting and labour hire in these sectors. In FY26, we took two specific steps to strengthen protections for workers in these arrangements.

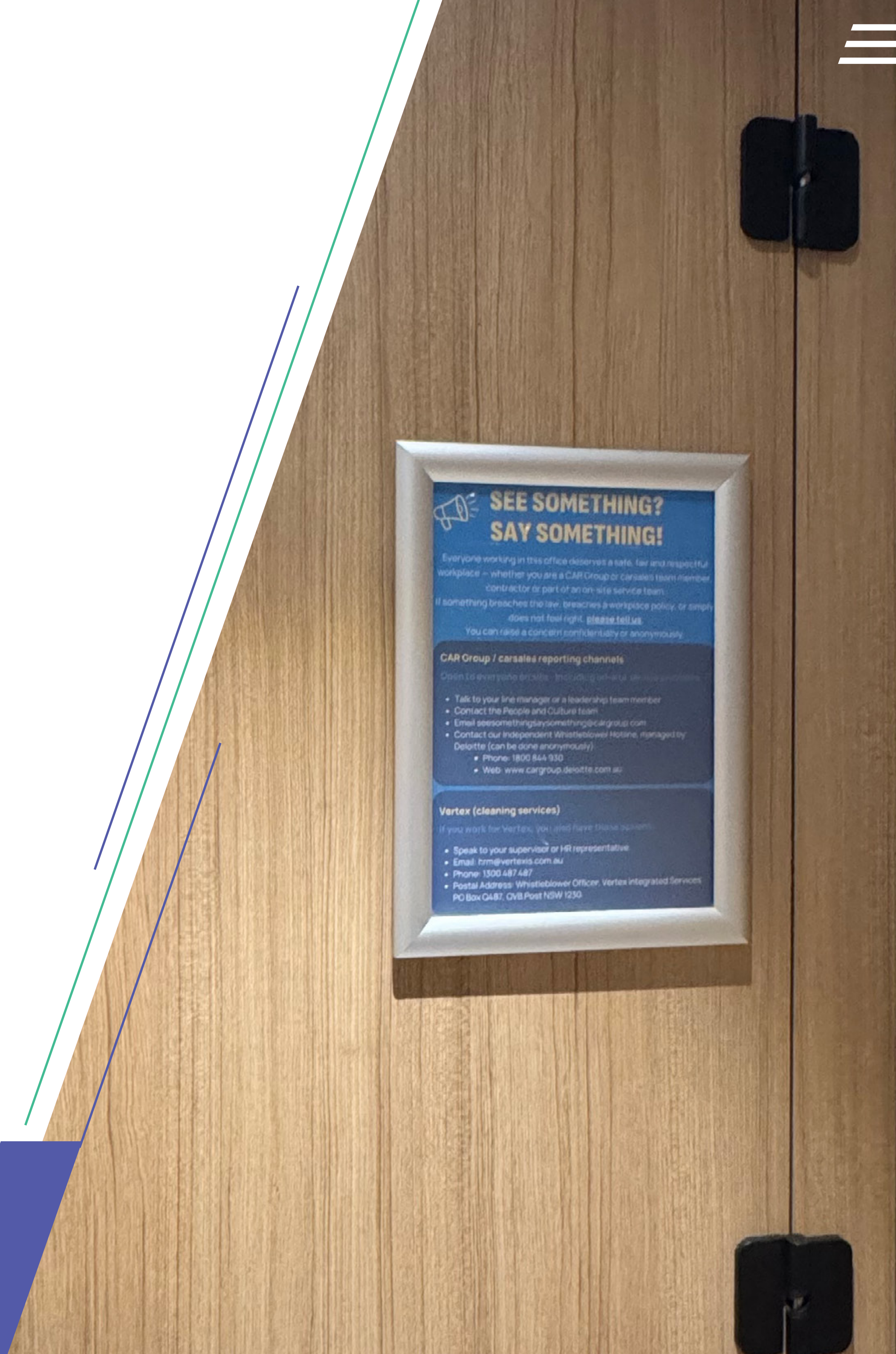
First, we asked on-site service providers whether they maintain their own whistleblower or grievance mechanism. Where they do, we have incorporated their grievance contact details into our own workplace communications so that subcontracted workers have a genuine choice about where to raise a concern – with their direct employer, or with CAR Group directly. This matters because workers in subcontracted arrangements may not feel comfortable raising concerns through their direct employer, particularly where the employer is the subject of the concern.

Second, we printed and displayed *See Something? Say Something!* posters in private communal spaces across our Australian offices – including behind toilet doors and in bin rooms. These spaces were chosen deliberately: they provide visibility to all workers on site, including cleaning and facilities staff, while offering a degree of privacy that makes it easier for someone to read and act on the information without fear of retaliation.

Payroll and bank account verification

Within families and intimate relationships, control over a person's money and earnings can be used to dominate or coerce them. Where someone is compelled to keep working while another person decides how their pay is used, that situation can amount to, or point to, modern slavery. More broadly, having little control over one's own finances often goes hand in hand with isolation, dependence, or limits on personal freedom, conditions that leave a person more exposed to exploitation. These dynamics are not confined to supply chains; they can affect people within our own workforce.

In FY26, we introduced a bank account name verification process for all CAR Group employees in Australia to help identify and prevent this type of abuse. Our payroll team cross-checked each employee's name against the bank account name nominated for salary deposits, to confirm that individuals are receiving their wages directly and are in control of their income. There were 12 discrepancies identified; each was investigated by the People and Culture team, which confirmed there were legitimate reasons for the names not matching, most commonly where an individual had mistakenly entered their bank's name in place of their account name. No instances of abuse were identified. The process will be conducted annually, and we hope to extend a similar process to our international marketplaces in FY27.



Managing risks in our supply chain

We manage supply chain risks through a combination of controls which are set out in this section of the statement.

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, meet the expectations set out in our SCoC, provide reasonable access to records and premises where appropriate, and support the training of their employees and subcontractors.

Supplier Code of Conduct

Tier 1 suppliers are required to comply with the SCoC as a condition of engagement, where practicable. The SCoC sets minimum standards on forced labour, child labour, recruitment fees, working hours, wages, humane treatment, and grievance mechanisms. Suppliers are required to extend equivalent standards to their own supply chains.

Key provisions relevant to identified risk categories include:

- No forced, bonded or indentured labour; no confiscation of identity documents or passports.
- No recruitment fees charged to workers; employment agreements in workers' native language; particular attention to migrant workers, refugees and asylum seekers.
- Supplier must maintain whistleblower protection and a confidential grievance process.
- Responsible sourcing of conflict minerals (cobalt, tin, tungsten, tantalum, gold), relevant to ICT hardware supply chains.
- Suppliers must promptly notify CAR Group if modern slavery is identified in their operations or supply chains and cooperate in a remediation plan that prioritises the interests of affected workers.
- Due diligence on third-party labour recruiters, who are contractually prohibited from charging fees to workers; suppliers bear repatriation costs, which must not be deducted from wages.
- Suppliers must, where practicable, map their own supply chains to identify sub-suppliers and assess modern slavery and labour rights risks.
- Compliance is a condition of supplier selection, where practicable, and may be verified through self-assessment or audit, including site visits, with repeated non-conformance reserving CAR Group's rights.

Where a supplier has its own Code of Conduct, we assess its alignment with our expectations and may accept it in place of our SCoC where it meets a similar standard.

Supplier onboarding questionnaire

CAR Group applies a principles-based approach to supplier onboarding: questionnaires across the Group address the same core modern slavery issues while allowing regional variation, so each marketplace can use processes suited to its local operating environment while maintaining consistent risk mitigation globally. RedBook's international subsidiaries only engage a small number of suppliers and apply the Group questionnaire where a spend threshold of A$5,000 is met; Trader Interactive, webmotors, Encar and chileautos operate their own local onboarding processes, but all have an onboarding questionnaire aligned to CAR Group requirements.

We gather modern slavery information through the SOQ or, in some markets, an equivalent platform (such as Linkana, used by webmotors in Brazil). Responses are risk-rated, and where a supplier is assessed as presenting a modern slavery risk the matter is escalated for review before engagement proceeds.

Where the SOQ cannot be completed, for example for low-value or online purchases or where a supplier declines, we aim to assess risk using other sources such as the supplier's modern slavery statement, relevant policies, publicly available data, or direct discussions.

In Australia, new suppliers complete the online SOQ, which our supplier screening tool assesses automatically. It captures corporate structure; country of operation (assessed against the Global Slavery Index 2023 vulnerability scores); existing modern slavery compliance programs; reliance on subcontractors and upstream suppliers; history of modern slavery incidents; reliance on low-skilled foreign or domestic migrant workers; and the category of product or service.

Higher-risk categories flagged include:

- Automotive components
- Construction products and services
- Electronics (such as computer hardware)
- Garments (such as professional t-shirts)
- Labour hire or professional services predominantly from outside Australia
- Mining or raw materials
- Office services (such as catering, security, maintenance and cleaning)
- Textiles
- Transportation or shipping services

Contract requirements

Suppliers are required to notify CAR Group of actual or suspected instances of modern slavery identified in their operations or supply chains. Indicators that may give rise to such suspicion include red flags such as excessive overtime, workers sharing bank accounts, or signs of document confiscation.

Building capability and awareness

Effective management of modern slavery risk depends on people across the Group being able to recognise and respond to it. 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.

- **Modern Slavery Champions:** Each CAR Group marketplace has a designated Modern Slavery Champion responsible for coordinating the local implementation of our modern slavery program. Champions are the first point of contact for staff with questions or concerns and are responsible for ensuring that local supplier onboarding processes reflect Group requirements.
- **Modern Slavery How-To Guide:** Our new Modern Slavery How-To Guide, introduced in FY26, is the primary practical resource for use internally. Written in plain language, it provides step-by-step guidance on assessing supplier risk, responding to suspected incidents, managing newly acquired businesses, and maintaining records. It is available in a shareable format that can be translated into local languages. All Modern Slavery Champions were asked to read and share the guide with their teams.
- **Training:** In FY26, our core modern slavery eLearning module continued for all Australian-based team members. This is a mandatory compliance training module and is embedded in the onboarding program for new starters. We had hoped to extend the module to our non-Australian marketplaces in FY26; instead, we have decided to review it in early FY27 and roll out a refreshed module to all marketplaces, including Australia.
- **External awareness and training:** Beyond our direct operations, we extend education and support to suppliers. Suppliers are given access to tailored training materials and guidance, and in high-risk categories we follow up with selected suppliers to encourage engagement with the materials and clarify our expectations. These efforts support supplier capability uplift and help ensure our ethical sourcing commitments are clearly understood by our business partners.
- **Speak-up culture:** A culture where people feel safe to speak up is itself a control against exploitation. Our FY26 Performance Culture Survey found that 86% of our people agreed they would feel comfortable reporting inappropriate behaviours at work, up 2% on the prior year. 91% agreed their manager is approachable and easy to talk with, and 91% agreed their manager is honest and ethical in their business practices. These results reflect the investment CAR Group has made in its speak-up culture and provide confidence that reporting channels would be used if concerns arose.

Grievance and remediation

Workers – whether directly employed by CAR Group, engaged through a labour hire arrangement, or working for one of our on-site service providers – should have access to a clear and safe way to raise a concern. CAR Group's approach to grievance is built on multiple overlapping channels, so no single point of failure can prevent a concern from being heard.

See Something? Say Something!

CAR Group's *See Something? Say Something!* Policy is our primary speak-up mechanism. It covers all forms of workplace concern, including indicators of modern slavery such as excessive working hours, underpayment, signs of document confiscation, or workers who appear to be living under unusual control or restriction.

Our whistleblowing service, which is detailed in our *See Something? Say Something!* Policy, is available to suppliers and their employees, partners, and members of the local communities in which we operate.

In FY26, we embedded a monthly *See Something? Say Something!* reporting metric into our global People and Culture scorecard. Each marketplace's People leader completes a monthly grievance log capturing the number of grievances received locally; these logs are provided to the Group's Chief People Officer and combined with reports received through our whistleblowing service and the seesomethingsaysomething@cargroup.com inbox to form the metric. The metric tracks the volume of concerns raised each month; regular reporting signals a healthy speak-up culture, and the absence of reports is treated as a flag, not a positive.

We also refreshed our *See Something? Say Something!* communications across all marketplaces in FY26 so reporting channels remain visible and people know how to find and access the service when they need it.

In FY26, we also tested our whistleblowing hotline to confirm it is a live, monitored line that people can reach, and we will repeat this check each quarter so that anyone raising a concern can be confident it will be received.

To raise a concern, CAR Group encourages disclosures to be made using the independent whistleblower service, known as the Whistleblower Hotline @CARGROUP. This service is supported by Deloitte and allows employees to submit anonymous or named disclosures.

You can access the Whistleblower Hotline @CARGROUP through:

- Dedicated hotline number: 1800 844 930 (Australia only)
- Website: www.cargroup.deloitte.com.au (global)

Remediation

Where an indicator or instance of modern slavery is identified – whether through a grievance report, supplier audit, or other means – CAR Group follows a process that covers investigation, escalation, corrective action, and support for affected workers.

Depending on the nature and severity of the concern, our response may include:

- Requiring a supplier to remediate risks before or as a condition of continued engagement
- Restricting the scope of work
- Requesting a corrective action plan with defined timelines
- Conducting enhanced due diligence or requesting a third-party audit
- Requiring the supplier to undergo training
- Seeking additional contractual assurances

Throughout this process, the wellbeing of affected workers remains the primary consideration.

Where a supplier fails to cooperate with a remediation plan, demonstrates repeated non-compliance with SCoC requirements, or where a serious or confirmed instance of modern slavery is identified and the supplier is unwilling or unable to take corrective action, CAR Group reserves the right to suspend or terminate the supplier relationship. Termination would be treated as a last resort where continued engagement would pose an unacceptable risk to people. In cases where ending a supplier relationship could itself harm workers – for example by removing a source of income without alternative support – we would consider responsible exit approaches.

In FY26, no instances of modern slavery were identified or reported across CAR Group's operations or supply chain. Where concerns are raised that do not meet the threshold of modern slavery, they are investigated and followed up in accordance with applicable policy.

Measuring the effectiveness of our actions

Measuring effectiveness is how we hold our modern slavery program to account. CAR Group assesses its progress against three overarching goals:

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

We also reflect on how well we have delivered against the specific commitments made in our previous Modern Slavery Statement. Effectiveness is reviewed annually by the Sustainability team in consultation with relevant teams, as part of our broader sustainability performance cycle.

Table 5. Effectiveness of our FY26 actions

Focus area	What we did	What we found and how we're responding
Policies and standards	• Reviewed our Modern Slavery Policy and SCoC against current risks, including recruitment-related debt bondage, and against how easily stakeholders could find our commitments.	• Recruitment fees were not explicitly prohibited, and our commitments were not easy to find. • We updated the SCoC to prohibit recruitment fees, mandate repayment where charged, and strengthen worker-contract protections, and published both the Policy and SCoC on our shareholder website for the first time.
Worker protections and verification	• Cross-checked the salary bank-account name of 100% of our Australian employees against payroll records.	• 12 discrepancies were identified, each was investigated by People and Culture and cleared with legitimate explanations, and no instances of abuse found. The check will now run annually, and we aim to extend it to our international marketplaces in FY27.
Supplier due diligence and visibility	• Assessed 306 new suppliers through our onboarding due diligence process. • Commenced a changeover of our Australian corporate travel provider.	• Our due diligence remains strongest at the onboarding stage, so we identified conflict minerals as a priority for deeper engagement beyond Tier 1 and will continue to build visibility and engagement on conflict minerals and other Tier 2 risks through FY27. • The new travel platform gives us real-time visibility over bookings and suppliers, enabling us to apply travel controls and strengthen oversight of accommodation and transport providers as the transition completes.
Grievance and reporting	• Reviewed the reporting options available to subcontracted on-site workers in Australia. • Tested our Deloitte whistleblowing hotline to confirm it is a live, monitored line. • Embedded a monthly See Something? Say Something! reporting metric into our global People and Culture scorecard and reinforced our *See Something? Say Something!* communications across the Group.	• Recognising on-site workers may not feel comfortable reporting through their direct employer, we integrated on-site provider grievance channels into our own workplace communications. • The hotline is operational, with a quarterly check now in place. • The monthly metric tracks the volume of concerns raised each month; we treat regular reporting as a sign of a healthy speak-up culture and an absence of reports as a flag, not a positive. • Our most recent Performance Culture Survey found that 86% of our people would feel comfortable reporting inappropriate behaviours at work, up 2% on the prior year, with 91% saying their manager is approachable and 91% saying their manager is honest and ethical in their business practices.
Training and awareness	• Introduced a new plain-language Modern Slavery How-To Guide for our Champions and teams. • Continued mandatory eLearning training for all Australian team members.	• The Guide gives Champions and procurement teams practical, step-by-step guidance where none existed before. • Training completion remains high (97%), but completion alone doesn't confirm understanding, so in FY27 we'll refresh the module, extend it to all marketplaces, and consider introducing checks on staff comprehension and retention.

Table 6. Progress against FY25 commitments

Commitment	What we said we would do	Status	Progress in FY26
Synergies with domestic and international CAR Group businesses	Continue to focus on exploring synergies across international subsidiaries to further improve processes and reporting data.	Completed (and ongoing)	In FY26, we refreshed our Modern Slavery Policy, introduced a new Modern Slavery How-To Guide, and strengthened our SCoC to drive better alignment across the Group and greater consistency in how we approach modern slavery.
Prioritisation of risk and action	Hold a cross-functional prioritisation workshop to review risk assessment findings, identify the most impactful areas for action, and update our modern slavery risk register.	Completed (and ongoing)	In FY26, we held a risk prioritisation workshop to contextualise the findings of our external modern slavery risk assessment and agree priority actions. The workshop confirmed a focus on the categories where we have both high spend and high influence, and we have a list alongside category-specific priority governance actions that we are now working through.
Embed modern slavery risk into commercial practice	Review procurement and contracting practices in high-risk categories to identify whether timelines, pricing pressures, or sourcing structures may contribute to modern slavery risk.	In progress	Modern slavery risk considerations have been incorporated into the new Modern Slavery How-To Guide, providing procurement and contract management staff with practical guidance. Further embedding into category-level commercial frameworks is planned for FY27, informed by the actions arising from our cross-functional prioritisation workshop.
Tabletop exercise for managing modern slavery incidents	Involve more internal stakeholders in further tabletop exercises to increase knowledge and awareness across businesses.	**Carried forward to FY27**	A dedicated tabletop exercise was not held in FY26 due to resourcing constraints. In the meantime, we strengthened incident-response readiness through the new Modern Slavery How-To Guide, which sets out how to recognise and respond to suspected modern slavery incidents. We aim to run a cross-functional tabletop exercise in FY27 to test and embed this response in practice.
Define supplier grievance and remedy expectations	Establish clear expectations for supplier-side grievance mechanisms and develop a process to support remediation where CAR Group may contribute to harm.	Completed	Our SCoC includes an explicit requirement for suppliers to maintain a confidential grievance process accessible to all workers. In FY26, we also integrated on-site service provider grievance channels into our own workplace communications in Australia, so that subcontracted workers have a direct reporting option. Formal remediation process guidance is set out in our new Modern Slavery How-To Guide.

Measuring the effectiveness of our actions continued

Key performance indicators

Our supplier due diligence processes have strengthened over recent years. We recognise, however, that our efforts to date have focused predominantly on risk prevention, screening suppliers before onboarding, rather than deep-chain auditing of existing supply relationships. Discovering and remediating instances of modern slavery is itself a marker of a robust program, and CAR Group is committed to building the kind of supply chain transparency that makes surfacing issues possible. We hope future reporting will reflect genuine discovery and resolution activity alongside the preventative work that has been our primary focus to date.

The table below tracks our key performance indicators over time. In FY26, we broadened our grievance metrics from a modern slavery specific count to the full volume of concerns raised and remediated through our *See Something? Say Something!* channels. A narrowly scoped figure that reads zero every year tells us little about whether people are using our reporting channels at all. Tracking overall grievance activity, and how much of it gets resolved, gives a more credible read on whether our speak-up culture is actually working. We have also introduced a 'suppliers engaged' metric. Previously we were only capturing instances where suppliers chose to report to us; it now reflects the disclosure requests, site visits, whistleblower mechanism checks and deeper due diligence through which we engage with suppliers directly, showing that the relationship goes beyond contracts and payments.

Table 7. Key performance indicators

KPI	Description	FY21	FY22	FY23	FY24	FY25	FY26
GLOBAL							
Grievances raised	Total number of grievances raised across the Group through all *See Something? Say Something!* reporting channels.	New from FY26					41
Grievances investigated	Number of grievances that were investigated. *Note: where a grievance was substantiated, it was remediated in line with our policies.*	New from FY26					41[1]
Suppliers engaged	Number of suppliers engaged through activities such as onboarding, contract renewal, disclosure requests, site visits, whistleblower mechanism checks and deeper due diligence, reflecting active, ongoing engagement with our supply chain.	New from FY26					310
Mandatory induction training completion	Percentage of employees assigned mandatory induction training (Code of Conduct, Anti Bribery & Corruption) who have completed it.	96%	98%	99%	99%	98%	97%
AUSTRALIAN OPERATIONS							
Modern slavery training completion	Percentage of employees assigned modern slavery training who have completed it. Training is valid for 12 months, after which a retake is required.	N/A	100%	100%	100%	83%[2]	97%
Supplier Code of Conduct acceptance	Percentage of suppliers who completed the SOQ and agreed to comply with CAR Group's SCoC.	97%	95%	93%	90%	95%	94%

1. Of the 41 grievances raised and investigated, five came through our whistleblowing service. Of these, four met the disclosable matters definition set out in our *See Something? Say Something!* policy. Following investigation, three of these matters were not substantiated and one was substantiated and remediated.
2. The FY25 training completion rate of 83% reflects timing of a full Australian workforce rollout that commenced late in FY25. Not all team members had sufficient time to complete the module before year-end.

Our future commitments

Addressing modern slavery is not a fixed program – it requires us to keep pace with changes in our business, our supply chain, and the broader risk environment. The commitments below reflect where we intend to focus in FY27 and beyond. They build on progress made in FY26 and respond directly to gaps identified through our external risk assessment and expert review.

Table 8. Our future roadmap

Area	Commitment
Appoint a Group procurement lead and embed modern slavery in commercial practice	Appoint a Group-level procurement role with a broad remit, of which modern slavery will be one part, to strengthen how we source and manage suppliers and drive greater alignment across our marketplaces. Procurement and contracting practices in higher-risk categories – including marketing, offshore services, and ICT – will be reviewed to identify whether timelines, pricing structures, or sourcing arrangements may inadvertently contribute to modern slavery risk, with commercial guidance and category management processes updated where gaps are found.
Review global supplier due diligence requirements	Our international marketplaces – Trader Interactive, webmotors, Encar, and chileautos – each operate their own supplier onboarding and due diligence processes suited to their geographies. We intend to work with each marketplace to review and refresh these processes, supported by the rollout of our updated SCoC across our international operations during FY27.
Deepen supply chain visibility beyond Tier 1	A large proportion of our modern slavery risk sits beyond our direct suppliers, in the networks of subcontractors, labour providers, and raw material sources that our Tier 1 suppliers rely on. We intend to engage selected Tier 1 suppliers, prioritised by risk category, to gather information about their own supply chains; even partial visibility at Tier 2 is a meaningful step forward and will inform how we prioritise future due diligence. To support this, we intend to introduce a Group-level supplier compliance platform, moving beyond point-in-time questionnaires towards ongoing monitoring and a consolidated view of supply chain risk across markets, with existing marketplace platforms assessed for integration or alignment where practicable. Conflict minerals in electronics supply chains are a particular focus for this deeper engagement, given the heightened risk of forced and child labour in raw material extraction at Tier 2 and beyond, and we aim to improve traceability and supplier engagement on these inputs over time.
Strengthen incident response capability	Run a scenario-based tabletop exercise involving Champions and relevant stakeholders from across the Group to test our incident response process end-to-end – from initial identification through to escalation, investigation, and remediation. Where practicable, we will aim to include a key supplier in this exercise as a joint simulation, strengthening remediation and escalation processes across both organisations and our shared supply chain while supporting strong supplier engagement and trust.
Continue to strengthen international synergies	Continue to work with all our marketplaces to share learnings, align on risk priorities, and improve consistency in how modern slavery is identified and managed across jurisdictions. We will also explore whether the payroll bank account verification process introduced in Australia in FY26 can be extended to other marketplaces.
Responsible AI use	Develop and implement a responsible AI use in recruitment clause to ensure there is no discrimination in candidate screening within our operations, our labour hire providers, and our supply chain.

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

William Elliott

Managing Director and
Chief Executive Officer
CAR Group Ltd

Date: 6 August 2026