



Our part, driving tomorrow.

Amotiv Limited
Formerly GUD Holdings Limited
ABN 99 004 400 891

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In this Statement

This Modern Slavery Statement describes the actions of Amotiv Limited¹ (**Amotiv**) and its subsidiaries (**Amotiv Group** or **Group**) to identify and address modern slavery risks in the Group's operations and supply chains during the year ending 30 June 2024 (**FY24**). It is published in compliance with the Australian *Modern Slavery Act 2018 (Cth)* (**the Act**) as a joint report by Amotiv and those of its subsidiaries which are reporting entities within the meaning of the Act. Amotiv is headquartered in Melbourne, Australia.

Modern slavery encompasses situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.² It is a term reserved for situations of greater severity than mere substandard working conditions or underpayment of workers alone (although these are important indicators). The Act defines "modern slavery" as including various types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; certain illegal practices relating to non-citizens working in Australia; and the worst forms of child labour (where children are subjected to slavery or similar practices, or engaged in hazardous work)². The Amotiv Group is not willing to tolerate these activities. This Statement explains how the Group manages the risk of them occurring in its operations and supply chains.

The table below outlines where information related to each of the mandatory criteria in section 16 of the *Modern Slavery Act 2018 (Cth)* can be found:

Mandatory criteria	Section, Page
1. Identify the reporting entity.	Section 3, Page 7
2. Describe the reporting entity's structure, operations and supply chains.	Section 4, Page 8
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Section 5, Page 11
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Sections 6, Page 14
5. Describe how the reporting entity assesses the effectiveness of these actions.	Section 7, Page 19
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Section 8, Page 20
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Section 9, Page 21

This Statement was approved by the Amotiv Board on 9 December 2024.

1. Until 24 June 2024 the name of the Company was GUD Holdings Limited (ASX: GUD)

2. 'Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities' May 2023 (page 8) at: <https://modernslaveryregister.gov.au/resources/>

From the Chair, Risk & Sustainability Committee and the Managing Director & CEO

Amotiv has had a longstanding focus on managing modern slavery risk, as part of the Group's Sustainable Sourcing Program (**Program**), which started in 2018.

The Program applies to the entire Amotiv Group, wherever located. The recently acquired Rindab business (located in Sweden) was inducted into the Program during FY24.

The Group has progressed well during FY24. Modern slavery supplier assessments have now been completed¹ for suppliers representing approximately 98% of the Group's tier 1² expenditure on goods procurement, with 95% achieving our modern slavery base level accreditation. This is particularly pleasing when the diverse nature of the Group's businesses (and range of supplier cohorts) is taken into account. As reported in the 2024 Sustainability Review, during the year our businesses further uplifted supplier engagement in the Group's Program to over 1,000 product and service suppliers.

A major achievement during the year was the establishment of the Amotiv Asia Sourcing Office (**ASO**). Located in China, the ASO is charged with maintaining close working relationships with suppliers. The ASO supports all businesses across the Group to execute activities under the Program; particularly assessing and responding to modern slavery risks through direct onsite engagement with suppliers in the region. The establishment of the Asia Sourcing Office and the new Divisional structure of the Group are both expected to enable increased consistency and maturity of the Program across the Group.

The Group continues to focus on the management of modern slavery risk as an important aspect of its overall strategy. We recognise that business strategy and sustainability strategy (which includes the management of modern slavery risk) must be developed in tandem and are interdependent. The GUD2025 Portfolio Vision is a Group-wide strategy which has guided us over the past 3 years. Importantly it incorporates strategy for sustainability, within six environmental, social and governance (**ESG**) impact areas we focus on. Sustainable Sourcing, including managing modern slavery risk, is one of these six identified impact areas³. The Group reported on progress in these 6 areas in its 2024 Sustainability Review and has published sustainability data about its FY24 progress in those areas on its website, including progress against its Program metrics.

Managing modern slavery risk in our operations and our supply chain is closely aligned with the Group's culture and values. These include 'People are at the heart of all we do' - modern slavery practices are the antithesis of this value.

The Program delivers risk management outcomes in areas beyond modern slavery, recognising the interconnected nature of workplace and social issues (including but not limited to modern slavery risks). It also encompasses working conditions, fair pay, discrimination, safety, business ethics and environmental practices. Managing modern slavery risk is a fundamental goal of our Program.

Since the establishment of the Program, our management of modern slavery risk has continued to mature, with newly acquired businesses participating in the Program as they integrate into the Group. Nevertheless, notwithstanding the breadth of the Program and pleasing progress, given the range of sizes of our businesses (and the resources available to them), there is some variation in the stages of maturity of implementation of the Program across the Group. In this respect the Board recognises that there remains further work to do and that continuous progress is required.

Looking to FY25, the Group has engaged a Chief Strategy, Sustainability and Innovation Officer who will lead ESG progress, including modern slavery risk management. As part of its continuous improvement approach, the Board plans to review the Ethical Sourcing Code, the modern slavery risk assessment matrix and other elements of the Program in the coming year.

We are pleased to report the Group's actions and achievements during FY24 and the status of our modern slavery risk management in this Statement.



Jennifer Douglas
Independent Non-Executive
Director and Chair of the Risk
and Sustainability Committee



Graeme Wickman
Managing Director and Chief
Executive Officer

1. Assessments are sought on a 2 year rotation.
2. A tier 1 supplier is a supplier directly engaged by an Amotiv business.
3. The six ESG impact areas are detailed in the 2024 Sustainability Review which can be found starting at page 20 of [Amotiv's 2024 Annual Report](#).

1. Modern Slavery Risk - Dimensions and Progress

Operations across
7 countries and 
~1,950 employees

1,600+
suppliers



Established the Amotiv
**Asia Sourcing
Office**



Became an
automotive pure play



95% Tier 1
goods suppliers met
base level assessment
(↑ 6%) 

Proud to be a
Sedex
Member

 **> 1,000**
suppliers engaged in
the program
(↑ 60%)

124 site visits
over 2 years



2. Modern Slavery Governance at Amotiv

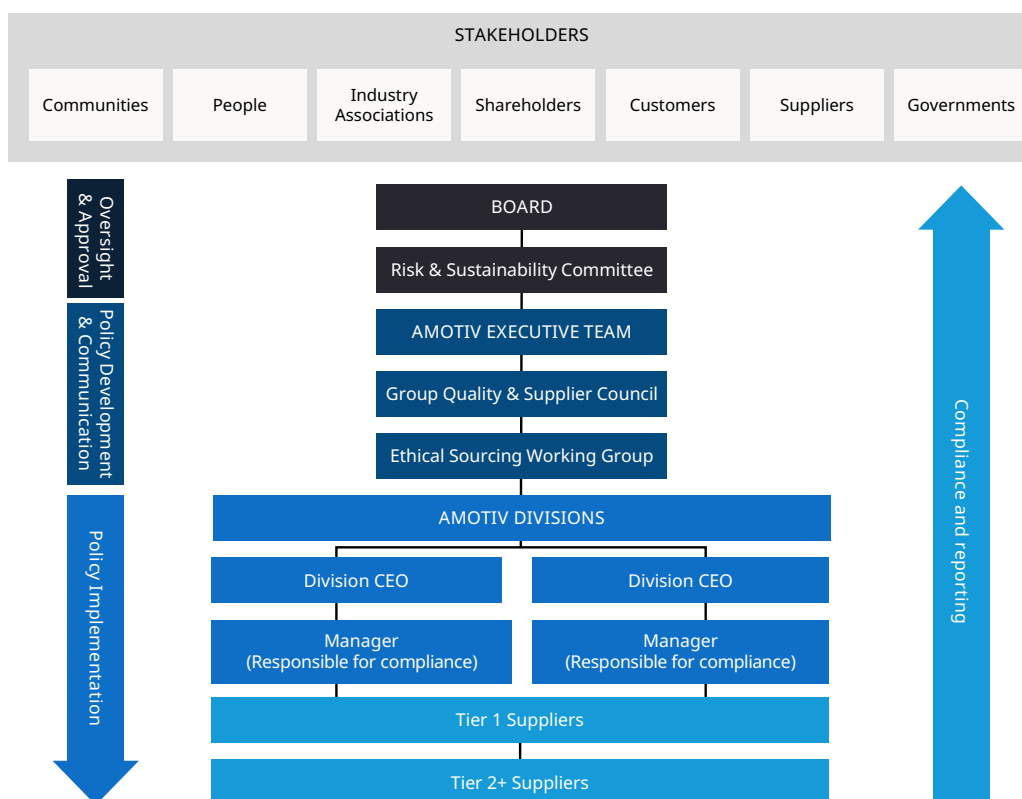
The Amotiv Board oversees the management of modern slavery risk (and ethical sourcing more broadly) through its Risk & Sustainability Committee. The Risk & Sustainability Committee comprises all Amotiv Directors and its Charter sets out its role, which includes overseeing (and making related recommendations to the Board about) sustainability at Amotiv. The Group regards "sustainability" as including the Ethical Sourcing Code (**Code**), the management of modern slavery risks and the preparation of this Statement. The Code is available on Amotiv's website under the [Corporate Governance](#) tab.

The Code, including standards, prohibits modern slavery practices. The Program uses the Code standards and the standards of the independent global Supplier Ethical Data Exchange program operated by Sedex Information Exchange Limited (**Sedex**) for supplier assessment. Sedex's SMETA is the preferred audit tool to inform supplier assessments.

Amotiv Divisions are accountable for meeting the Code standards in their own operations, including undertaking due diligence enquiries of suppliers under the Program. They are provided with training, tools and support to enable them to perform their required Program activities. During FY24, they also gained access to the ASO who can assist "on the ground" in Asia to conduct activities under the Program.

During FY24, implementation of the Program across the Group and its supply chain continued to be facilitated through the Group's Quality & Supplier Council (**Council**) and its Ethical Sourcing Working Group (**Working Group**). Personnel responsible for sourcing and supplier relationships from each Amotiv Division sit on the Council and are responsible for embedding processes into their businesses to apply the Program in their supply chains.

The Working Group facilitates training and the use of shared resources, such as the Sedex platform and various tools for enabling implementation of the Program. It provides practical guidance on implementation of the Program with the support of a legal expert who sits on the Working Group. The Group has subscribed to the Sedex platform for a number of years and it provides a robust, independent standard. The Group provides its suppliers with flexibility and accepts Sedex-equivalent independent assessments to facilitate a broader number of suppliers ability to be assessed.



Amotiv incentivises its senior executives across the Group to discharge the activities required by the Program by establishing targets which form one component of the Group's Short Term Incentive Program. The target in FY24 measured the percentage of tier 1¹ goods suppliers (by value of spend) who were assessed under the Program (over a 2 year rotation). For FY24 the target was to have assessed 85%, with a stretch target at 90%. These targets take into account the ever-changing cohort of suppliers and the risk of some suppliers declining to engage, or taking time to engage, with the Program. Pleasingly, the Group performed well and assessed 98% of tier 1 goods suppliers by procurement value, thereby exceeding the target.²

1. A tier 1 supplier is a supplier directly engaged by an Amotiv business.
 2. See Amotiv Limited's 2024 Remuneration Report, which commences at pg 29 of the [2024 Annual Report](#).

3. Reporting Entities

Amotiv Limited ABN 99 004 400 891 (known as GUD Holdings Limited until June 2024)¹ (**Amotiv**) is an Australian public company which is listed on the Australian Securities Exchange (ASX: AOV).

This joint Modern Slavery Statement is made by Amotiv Limited and its wholly-owned Australian subsidiary companies who are "reporting entities" within the meaning of the *Modern Slavery Act 2018 (Cth)*². These are³:

- AutoPacific Australia Pty Ltd
- Brown & Watson International Pty Ltd
- Ryco Group Pty Ltd

The parent entities of these companies (who are therefore also reporting entities within the Group) are:

- AutoPacific Group Bidco Pty Ltd
- AutoPacific Group Midco Pty Ltd
- AutoPacific Group Topco Pty Ltd
- AutoPacific Group Holdings Pty Ltd
- AutoPacific Group Holdco Pty Ltd
- Amotiv Limited

This Statement, in accordance with the Act, provides information in relation to global operations of the reporting entities including Amotiv, and therefore covers the Group's global operations and all its subsidiaries⁴.

References to "Group" or "Amotiv Group" in this Statement encapsulate Amotiv and the other reporting entities listed above, as well as the other wholly owned entities within the Amotiv Group.



1. Until 24 June 2024 the name of the Company was GUD Holdings Limited (ASX: GUD)
2. A reporting entity is defined in the Act and includes an entity with consolidated revenue of at least \$100 million for the reporting period, and which is either an Australian entity or a foreign entity carrying on business in Australia in that reporting period.
3. Based on revenue calculations which include revenue from overseas operations.
4. A list of all the Group's subsidiaries can be found on pages 105-106 of the [Amotiv 2024 Annual Report](#).

4. Structure, Operations and Supply Chains

Structure

Amotiv has been listed on the Australian Securities Exchange for over 60 years and is included in the ASX200 Index (ASX:AOV). Its registered office is in South Melbourne, Victoria. In August 2024 the Group announced its full year financial results which included global revenue of \$987.2 million.

Amotiv owns a portfolio of companies specialising in providing high-quality automotive products and solutions that meet the evolving needs of our customers worldwide. The company's recent history is marked by a strategic decision to move the portfolio of businesses towards the automotive original equipment and aftermarket, symbolised with a name change to Amotiv (formerly GUD Holding Limited).

The Group completed its transition into an automotive “pure play” group of businesses during FY24. Amotiv's businesses are grouped into three strategic operating divisions: Powertrain and Undercar; Lighting, Power and Electrical; and 4WD Accessories and Trailing.



The Group is focused on producing long-term shareholder returns and on maximising the value of its brand portfolio. Our brands are future-ready, clever ideas turned into technical products and services that people rely on every day. Our team is committed to making a positive impact and creating value for all stakeholders.

At the Group level, our actions and decisions are guided by our Portfolio Vision.

- Be the leader in 4WD Accessories and Trailing in ANZ with future export
- Hold a global leadership position in specialist Automotive Lighting
- Expand vehicle Power Management internationally
- Lead the EV Aftermarket in ANZ with a future in the APAC region
- Leverage Powertrain profitability
- Expand Undercar categories and leverage scale

The corporate structure of the Group includes wholly owned subsidiary entities in Australia, New Zealand, UK, USA, Sweden, South Africa, Thailand, Korea and China.

The Group complies with the ASX Corporate Governance Principles and Recommendations. It publishes the following annual reports which can be found on its website, www.amotiv.com: Half Year Results, Full Year Results including an Operating and Financial Review, Remuneration Report and Sustainability Report. Corporate Governance Statement and Modern Slavery Statement. It also provides information to stakeholders through ASX announcements and annual reporting to the Workplace Gender Equality Agency.

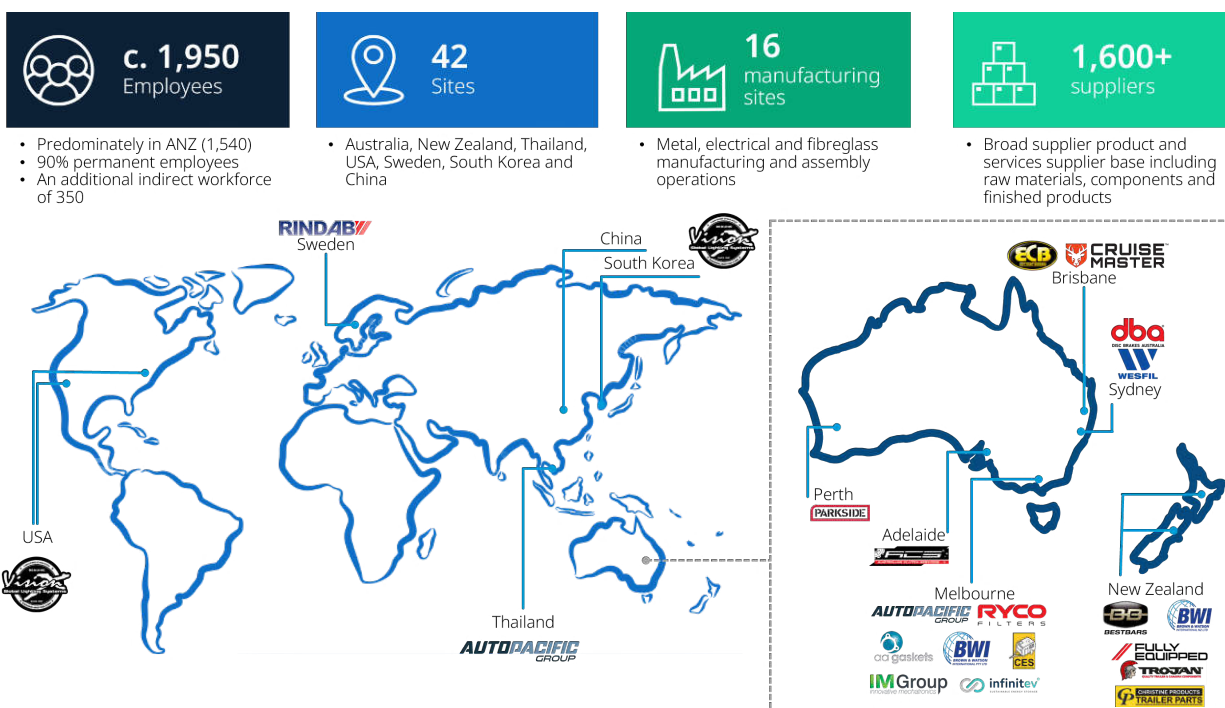
Operations

Amotiv businesses design, manufacture and source a broad range of automotive products with operations based in Australia, New Zealand, Asia, the USA, South Africa and Europe. Global distribution is managed directly by the businesses and via a network of independent distributors.

The key operations of the Group include:

- Product design, development and testing
- Purchasing, supply chain and logistics
- Manufacturing and assembly
- Warehousing and distribution
- Kitting and repackaging
- Repair and re-manufacturing
- Various support functions such as marketing, procurement, people support and so on.

Amotiv Operations Footprint and Dimensions



We invest in our people to develop a high-performing, highly engaged, and diverse workforce. The Group's directly employed workforce includes (as at end of FY24):

Amotiv Employees by Region¹

	Australia	Thailand	New Zealand	Asia ²	N. America	Europe ³	Other	Total
Number of employees	1,305	275	243	56	53	17	8	1,957
By contract type								
Permanent employees	1,231	275	236	54	49	16	8	1,869
Temporary employees	31	0	1	2	4	1	0	39
Non-guaranteed hours	43	0	6	0	0	0	0	49
Workers who are not employees	135	114	19	78	0	0	2	348

1. Employee numbers are reported in headcount at the end of the reporting period as an aggregate of all Amotiv businesses and regions.
 2. Asian region excluding Thailand - Predominately employees based in China and South Korea.
 3. Europe including the United Kingdom.

Supply Chains

Amotiv Group works with international supply chain partners to procure a broad range of products, materials and services. We aim to build long-term relationships and work with those suppliers who demonstrate a commitment to implementing policies and practices consistent with Amotiv values and policies. The Group's supply chains include over 1,600 suppliers across 34 countries comprising the following goods and services categories:

Goods (raw materials, components and products for resale):

As an automotive product supplier the largest element of our supply chain spend is sourcing inputs to manufacturing and finished goods including:

- Materials: Raw material inputs for manufacturing (e.g. Steel and Aluminium plate, tube, sections and extrusions)
- Components: Inputs to manufacturing, assembly or kitting operations (e.g. Fasteners, castings, brackets, and wiring)
- Finished Goods: Outsourced manufacture and sourcing of group branded product (e.g. filters, gaskets, and brake pads)
- Vendor Branded: Third party branded products for distribution (e.g. automotive and camping accessories)

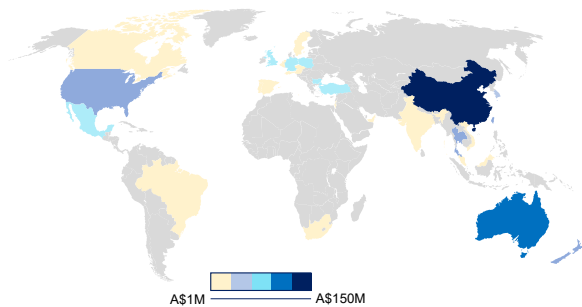
Services

The Group sources a diverse range of services to support our operations including:

- Transport and logistics (e.g. freight, courier and warehousing services)
- Facilities Management (e.g. cleaning, trades, grounds maintenance)
- Professional services (e.g. IT, marketing, printing, waste management)

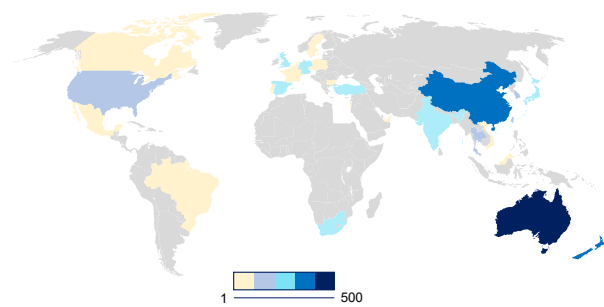
These Goods and Services are sourced from a number of jurisdictions across the world, where our suppliers and our operations are located. Of our first tier (immediate) goods suppliers, a slight minority are located outside Australia and New Zealand, and these are concentrated in Asia, as shown in the map below.

Amotiv Suppliers by Spend



1600+
Suppliers

Amotiv Suppliers by Qty



~850
ANZ based suppliers

~830
International based suppliers

5. Risks of Modern Slavery

Assessment of modern slavery risk

During FY24 the Group continued to undertake risk-scoping activities to assess areas of its operations and supply chains that may involve higher modern slavery risk.

The Group assesses modern slavery risk using:

- analysis of modern slavery risk factors in Amotiv operations and in its supply chain
- supply chain risk mapping of all product suppliers
- supplier assessment questionnaires, audits and on-site inspections
- grievance mechanisms and reporting

Analysis is informed by research, commentaries and investigative reports from ethical sourcing and human rights organisations, which monitor and evaluate widely recognised risk factors including:

- **Countries:** certain countries have a higher prevalence of modern slavery due to factors such as: weak rule of law, low degree of regulation or governance, political environment, limited access to civil liberties, high migration flows and socio-economic factors such as poverty.
- **Industries:** certain industries carry a higher risk of modern slavery including those: which are characterised by informality and a higher use of migrant, low-skilled or seasonal labour; which involve hazardous processes or the use of hazardous materials; and are low margin such as in raw material extraction and processing.
- **Products:** certain products may be linked to documented human rights abuses of migrant populations or a high risk of modern slavery due to the type of work, labour intensity or risks observed in the sector.
- **Vulnerable Populations:** industries and services which predominantly use low skilled and migrant workers are at higher risk as challenges with language and lower levels of education leave workers vulnerable to human rights abuses.
- **Business models:** Complex labour sourcing arrangements for services involving use of labour hire companies over direct employment carry an increased risk of modern slavery such as deceptive recruitment practices and bonded labour.
- **Entity practices:** human rights abuses such as discrimination, limited access to grievance mechanisms or collective bargaining rights, can be indicative of a higher risk of modern slavery. Similarly, the absence of formal documentation of working hours and payments can mask the exploitation of workers.

Modern slavery risk in Amotiv Operations

The Amotiv Group of businesses directly employ ~2,000 people across our global operations with an additional indirect workforce of ~350 people (e.g. labour-hire and contractors) supporting our manufacturing, and distribution operations.

The Group has growing numbers of employees in our global operations, including in Thailand, Korea, China and South Africa (where there are ~340 employees as at the end of FY24). In these jurisdictions there are inherently higher risks of modern slavery or of other practices which indicate modern slavery. Nevertheless our workforce remains predominantly located in Australia (~1,300) and New Zealand (~240), which are assessed as having low likelihood of modern slavery.

Also, the Group recognises the following areas may present risks of modern slavery:

External Labour-hire/contractors: Group businesses may engage labour-hire companies to supplement their direct workforce and respond to shifts in labour demand.

Migrant labour: Businesses may access specific skilled migrant labour to serve their business needs through employer-sponsored visa programs.

Offshore manufacturing: Amotiv businesses have manufacturing operations in countries (such as China and Thailand) which are exposed to inherently higher modern slavery risks (than Australia and New Zealand).

Other than the approximately 350 people in the External Labour-hire/contractor category above, the Group's workforce is directly employed by Amotiv businesses, such that they have control over the recruitment practices and employment practices (including contracts, terms and conditions). This control substantially reduces risk of modern slavery in the Group's operations.

In the above circumstances, we continue to assess the risk of modern slavery in our direct team as low.

Modern slavery risk in Amotiv Supply Chains

The Amotiv Group has extensive business relationships with international supply chain partners. Working with a large and diverse supplier base across 34 countries heightens modern slavery risks within our supply chain. We consider that these risks are higher where suppliers are located in those countries with a higher prevalence of modern slavery.

Amotiv groups its supply chain into the following Tiers:

- Tier 1 suppliers - are those who are direct suppliers to Amotiv businesses
- Tier 2 suppliers - are those who are suppliers to Tier 1 suppliers
- Tier 3 and above suppliers - are all other indirect suppliers in the Group's supply chains.

Evaluating the risk of modern slavery in Amotiv's supply chain is the first step to execute our Program and is conducted by Amotiv businesses using tools which measure risk indicators:

- Amotiv's Modern Slavery Risk Framework which determines the inherent modern slavery risk rating to countries by weighing a range of factors sourced from multiple independent sources.
- Annual supply chain risk mapping – this involves application of the Risk Matrix and measuring supplier spend and other factors in respect of all first tier suppliers of goods.

Geographic risk assessment

Amotiv Modern Slavery Risk Framework

Amotiv's modern slavery risk management classifies countries according to the country's inherent risk of modern slavery. Based on the inherent risk classification, countries are then ranked according to High, Medium or Low risk bands.

The Risk Framework has been developed with regard to human rights resources which measure risks relating to global modern slavery taking into account multiple factors including estimates of the prevalence of modern slavery, reported cases, access to civil liberties,¹ and government actions to combat human trafficking.

The use of multiple source materials is designed to capture the unique benefits of different ranking approaches. For example, the Global Slavery Index captures reported instances of slavery practices, the Freedom House score measures access to civil liberties and the Trafficking Victims Protection Reauthorization Acts² (TVPRA) tiering system ranks governments' actions to combat human trafficking.

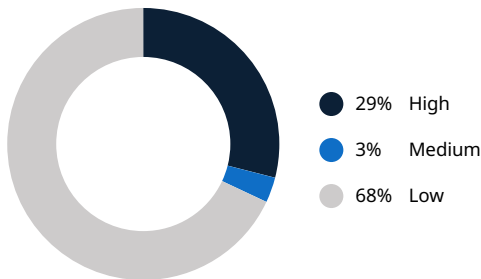
Resource	Ranking	Source Material & Methodology	Responsible
Global Slavery Index	Ranks countries on risk of modern slavery based on a 1-167 grading (highest to lowest 167)	Estimates the number of people in modern slavery using probabilistic surveys across countries on reported cases; data from assisted victims of trafficking in IOM12 databases; estimates from ILO13 on state-imposed forced labour	Walk Free Modern Slavery Index
Freedom House Score	Ranks countries as: <ul style="list-style-type: none"> • Free • Partly Free • Not Free 	Measures individual's access to political rights and civil liberties using on the ground research, NGO reports, academic data, news articles and professional contacts	Freedom House (US organisation established in 1941)
TVPRA Tiers	TVPRA Tiers rank countries into four tiers on government actions taken to eliminate human trafficking	Measures a government's actions to combat human trafficking against criteria specified in the TVPRA	US Bureau of International Labor Affairs, regulating the TVPRA
Amotiv Modern Slavery Risk Framework	Ranks countries at High, Medium and Low risk of modern slavery based on the inherent modern slavery risk using a numeric score out of 10 (highest score of 10 is the highest risk)	Score allocated referencing the ranking of the country by: <ul style="list-style-type: none"> • Global Slavery Index ranking • Freedom House Score • Ranking in TVPRA Tiers 	Amotiv Ethical Sourcing Working Group

1. The 'Global Slavery Index' 2023, by Walk Free, p. 24 published at <https://www.walkfree.org/global-slavery-index/downloads/> confirms that the top 10 countries with the highest prevalence for modern slavery share characteristics which include limited protections for civil liberties.
 2. Tiers were introduced under the Victims of Trafficking and Violence Protection Act, 2000 (as amended); taking into account reauthorisations introduced subsequently, including under the Trafficking Victims Protection Act 2019.

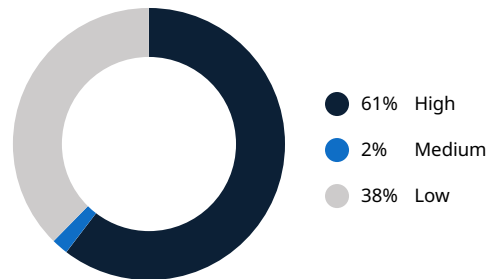
5. Risks of Modern Slavery (continued)

The FY24 supply chain mapping exercise assessed that the risk of suppliers representing approximately 61% of goods procurement expenditure were based in countries with an inherently high risk of modern slavery (in particular China and Thailand). Some of the inherent modern slavery risks associated partially with China include the high prevalence of forced labour and the vulnerability of migrant workers and minority groups due to discriminatory practices.

Goods Supplier Country Risk by No. Suppliers



Goods Supplier Country Risk by Spend



Industry and Product Risk Overlay

The Group also takes into account modern slavery risk existing in the supply chains of specific categories including raw material and commodity processing. However this aspect of risk assessment is less certain because assessing risk deeper into supply chains can be difficult due to the limited visibility and leverage the Group's businesses have with indirect suppliers.

Of the goods procured across the Group, there is wide recognition that modern slavery risks exist around solar panels (or more particularly, the materials used in their manufacture). The raw material supply chain in relation to manufacture of solar panels has been linked to use of state-enforced forced labour of workers from Uyghur, Turkic and other Muslim groups in the processing of poly-silicon for solar panels in Xinjiang, China¹.

The Amotiv Lighting & Power Management Division offers a range of portable solar panels which it imports for resale. While small in scale in the context of the Division's overall business (less than 2% of annual procurement spend of the Australian part of that Division), Amotiv is aware of the modern slavery risk in respect of the supply chains for these products and has ensured its first tier suppliers of solar panels are engaged in the Program. The Division remains carefully focused on its supply chain for this product category.

Services

Across the Group, our businesses source a broad range of services to support their operations. The Group's ethical sourcing risk scoping exercise has highlighted key services that are used across the Group which may attract modern slavery risk. Taking a risk based approach, the following common service areas have been progressively included in the Group's Program over the last few years:

On-site cleaning services: Amotiv businesses generally outsource cleaning services for each of their facilities. This industry is known to often use low-skilled, migrant and/or sub-contracted labour who are likely to be more vulnerable to exploitation, including modern slavery practices such as the confiscation of identity documents.

International freight forwarding: Amotiv arranges freight for a significant volume of import and export goods utilising international freight forwarders. This industry uses maritime shipping services which have been identified as high risk from a modern slavery perspective. This risk arises in the context of the multi-national and fragmented regulatory regime that governs the industry and the practical challenges of effectively monitoring and enforcing work practices on board vessels - which may result in workers being deprived of personal freedom (a modern slavery practice).

Labour hire companies: Amotiv businesses from time to time engage labour services via specialist human resources or labour hire companies. Amotiv recognises that the use of third parties in the provision of labour, especially of sponsored migrant labour, reduces Amotiv's direct visibility of the employment practices in relation to those people and may involve a risk of exploitation. Some types of such exploitation may involve modern slavery practices or practices which may indicate the presence of modern slavery, such as imposition of debt on the workers.

Warehousing services: Some Amotiv businesses use off-site storage and logistics services. Recent labour shortages in the logistics, warehouse distribution and transportation sectors makes this industry vulnerable to unethical employment practices. The seasonal demands of this industry may also result in temporary labour increases and use of a transient workforce which may attract modern slavery risk. The Program expanded to cover warehousing services during FY24.

While modern slavery does not include practices like unsafe or sub-standard working conditions, or underpayment of workers, these practices are exploitative and unethical practices which may indicate the presence of modern slavery or may escalate into modern slavery if left unchecked.

1. The Global Slavery Index identifies solar panels from China in the top 5 imported products in Australia at risk of modern slavery. 'Global Slavery Index', 2023, by Walk Free p.154 published at <https://www.walkfree.org/global-slavery-index/downloads/>.

6. Actions to Assess and Address Modern Slavery Risk

Material Modern Slavery Supply Chain Risks¹ & Amotiv's Risk Management Actions

Supplier Country	Practice which may constitute or indicate the presence of modern slavery	Products or Services	Tier	UNGP link to risk	Amotiv Response
Philippines	Deceptive recruitment practices	Labour hire companies	1	Contribute/ Directly linked	Direct engagement to select or interview candidates
China	Excessive overtime	Electronics	1	Directly linked	Chinese suppliers are prioritised for due diligence in the Program. Focus of Asia Sourcing Office on the ground in China.
Australia	Migrant labour exploitation	Contracted services including cleaning, maintenance and security	1	Directly linked	Priority due diligence area in the Program
International	Freedom of movement restrictions Forced labour	Shipping & freight services	1	Directly linked	Priority due diligence area in the Program
China	Forced labour	Poly silicon used in Solar panels	Tiers 2+	Indirectly linked	Priority due diligence area in the Program
Australia	Transient workforce exploitation	Warehousing & Logistics	1	Directly linked	Priority due diligence area in the Program

Asia Sourcing Office

In January 2024 the Group opened the ASO, based in China. This is a significant investment by the Group in procurement and managing ethical sourcing, including modern slavery risk.

The ASO's primary responsibilities are to provide procurement services and Program services to Amotiv Group businesses. In particular, the ASO conducts human rights audits by visiting supplier sites located in Asia and completing the Group's comprehensive audit process, which is based on international standard criteria and enquires into practices which may constitute or may indicate the presence of modern slavery.

Since its establishment within the Amotiv Group, the ASO has enhanced the number, standard and consistency of audits conducted across the Group under the Program. The conduct of human rights audits on behalf of Group businesses was a significant reason for the establishment of the ASO and reflects the Group's commitment to managing modern slavery risk. The ASO provided a "boost" to the actions the Group is taking to address modern slavery risks through the Program during the last few months of FY24:

- the ASO followed up supplier assessments on behalf of Amotiv businesses;
- the ASO reviewed and improved the ethical sourcing audit tool used by the Group so that it more closely aligns with SMETA (Sedex's audit tool); and
- the ASO commenced ethical sourcing auditing in March 2024 and by the end of June 2024 it had closed 4 supplier audit related tasks with 6 more planned.

1. These risks identified from research and, apart from instances of excessive overtime by suppliers in a small number of Chinese factories, are theoretical rather than identified and verifiable disclosures.

Ethical Sourcing Program

The Program seeks to implement the standards set out in the Code through a comprehensive set of steps and tools. It addresses human rights risks including modern slavery risk.

Securing commitments to meeting the Code standards, and ensuring compliance with human rights standards through due diligence and remediation in our own operations and those of our suppliers, is pursued through our Program.

Key elements of Amotiv's Program in relation to modern slavery are:

- Risk identification and Assessment: risk analysis, risk ranking, supply chain mapping, supplier screening, grievance mechanisms
- Prevention and Assurance: human rights due diligence, binding declarations of compliance with Code standards
- Remediation: corrective action plans, audits, site visits
- Monitoring: repetition of the above steps including cyclic human rights due diligence
- Mitigation: training, awareness raising, capacity building, reporting

Process	Risk Identification	Prevention and Assurance	Remediation	Monitoring	Mitigation
Risk Assessments & Reviews	√	√		√	√
Supplier Mapping, Screening & Risk Ranking	√			√	√
Safety risk reporting – Grievance reporting	√	√	√	√	√
Human Rights Due Diligence: Amotiv SAQ or Sedex SAQ (2 year cycle)	√	√		√	
Assurance of Compliance: e.g. Declaration of Compliance with the Code; contractual clauses (2 year cycle)		√		√	
Corrective Action Plans		√	√	√	
Site Visits		√	√	√	√
Audits		√	√	√	√
Training, Awareness Raising, Capacity Building		√	√		√
Stakeholder engagement, research, reporting (annual)	√	√			√

Key steps in the Program are described below. Whilst Amotiv businesses are at different stages of maturity with respect to the Program, the Group is pleased with the focus on ethical sourcing across the Group and with the speed with which newly acquired businesses who join the Group adopt the Program.

The Program is built on a framework of tools made available across the Group – including policies, implementation guidelines, modern slavery risk identification and evaluation tools, human rights due diligence assessment material, ethical sourcing clauses, declarations and reporting templates. Some resources, such as the Amotiv Self-Assessment Questionnaire ('SAQ'), are translated into Mandarin to ensure they are accessible and usable by our Chinese suppliers.

Program Tool	Description
Ethical Sourcing Code	Establishes minimum standards of compliance for suppliers in relation to labour, human rights, health, safety, environment, social governance and business ethics. It specifically prohibits modern slavery practices (as defined in the Act).
Ethical Sourcing Policy	Sets out Amotiv's expectations as to application of the Code to all Amotiv businesses and throughout the operations of their supply chain.
Implementation Guidelines	Provides internal guidance for Amotiv businesses on how to implement the Code with common standards to manage supplier engagement, undertake assurance activities and internal progress reporting.
Risk Framework	A matrix developed by Amotiv using multiple references to evaluate modern slavery risk and used by Amotiv businesses to evaluate risk of modern slavery by country.
Supply Chain Risk Map	A risk evaluation template used for Amotiv businesses to map their supply chain, evaluate risk and identify risk mitigation opportunities.
SAQ & Declaration of Compliance	To be completed by suppliers to determine and test supplier compliance with the Code and highlights any areas of non-compliance and remedial actions to address. (available in English and Mandarin)
Sedex SAQ & SMETA Audits	Sedex's on-line risk assessment tool (Radar), Sedex SAQ and Sedex Members Ethical Trade Audits (SMETA)
Ethical Sourcing Progress Report	To be completed by the Amotiv businesses to track and measure progress of Code implementation within their supply chains, identification of modern slavery risks and supplier remedial measures undertaken across the Group. This is analysed by the Ethical Sourcing Working Group and aggregated results are reflected in the Modern Slavery Statement.
Standard compliance clauses	Template clauses for inclusion in supply agreements to ensure compliance with ethical sourcing standards, co-operation with audits and grounds for termination if standards are not met.

Prevention and Assurance (Due diligence)

Amotiv aims its due diligence activity at driving improvement first, not penalisation, which has been critical in building greater transparency and trust with our supplier base. Suppliers operating in countries with inherently higher risk of modern slavery and suppliers representing relatively higher expenditure by the Group, are prioritised for due diligence.

The Amotiv Group recognises that practices in the supply chain which do not amount to modern slavery as such may nevertheless be indicators of modern slavery risk. Accordingly, the due diligence processes adopted by the Group encompass a broader suite of activities such as labour standards, record keeping, accommodation practices, wages compliance, health and safety standards and similar practices.

Supplier assessment

Our businesses engage with suppliers to provide them with the Code and require completion of self-assessments against the Code standards using the Amotiv SAQ or the Sedex on-line SAQ. These assessments are required on a two year rotation. Amotiv also accepts, in respect of its suppliers, human rights due diligence conducted through social compliance schemes which it considers to be of an equivalent standard (including EcoVadis, Amfori BSCI and the Drive Sustainability NQC).

The Amotiv SAQ enquires about the policies and practices of supplier operations for compliance with legal and international standards and with our Code including enquiring into practices relating to modern slavery risk.

Some parts of the SAQ (including those relating solely to modern slavery practices) are accorded a must pass status, and Amotiv businesses will take mitigating action if there is a failure of these. The SAQ has been translated into Mandarin, for ease of use by the significant proportion of Mandarin speaking suppliers, which has contributed to the successful engagement of suppliers in China.

Amotiv's membership of Sedex enables access for all Amotiv businesses to the on-line Sedex platform including the Sedex Radar and human rights risk and compliance assessment tools. Sedex's Radar risk assessment identifies key labour, human rights, governance and environmental risks by country and industry and can adjust risk scores based on site evaluations (Sedex SAQ). Amotiv businesses use this data, with some businesses still maturing their practices in this respect.

Commitments to Code Compliance and contractual terms

As part of Amotiv SAQ process suppliers must sign a declaration which confirms the grade of compliance and an undertaking to continue to maintain Code standards. Amotiv may also accept as sufficient compliance, human rights policies and assurance programs which clearly encompass modern slavery - a 'declaration of the equivalence' assures such standards being equivalent to those in Amotiv's Code.

The Ethical Sourcing Working Group provides many resources to support the prevention and assurance activities of the Amotiv businesses, including template clauses for use with suppliers to secure their contractual commitment to the Code compliance, and supplier co-operation activities. This aspect of the Program is expected to be reviewed during FY25 alongside an expected review of supplier terms and conditions under the new Divisional structure of the Group.

Audits

Given that modern slavery practices are often hidden, audits are a tool which can provide assurance that the represented compliance and practices of suppliers are in place operationally. Audits can also identify non-compliances and give rise to recommended remediation actions. The Group's use of on-site audits continues to mature and the establishment of the Asia Sourcing Office during FY24 has provided additional opportunity to use audit as a modern slavery risk management assurance tool.

Over FY23 and FY24 (2-year cycle), there were over 100 site-based audit reports, representing just over 30% of annual supplier spend. These included:

- audits against the Amotiv SAQ by Amotiv team members (including the Asia Sourcing Office)
- audits conducted against the Sedex Members Ethical Trade Audit (SMETA) standards¹ by accredited SMETA auditors
- audits against equivalent schemes by third parties

These human rights audits cover modern slavery practices as well as a range of other potential unethical practices.

All audits identify both non-compliances and corrective actions. SMETA audits provide incisive detail of non-compliances, and visibility for monitoring corrective actions. In FY24, Amotiv businesses initiated SMETA audits of suppliers located in China and Taiwan.

Remediation

Through our Program, Amotiv businesses work with suppliers to require them to remediate identified human rights non-compliances, including modern slavery practices or indicators of modern slavery risk if they are identified.

When evaluation of due diligence assessments and audits identify non-compliances, Amotiv's processes generally start by creating proportionate corrective action plans. This includes working with the supplier to:

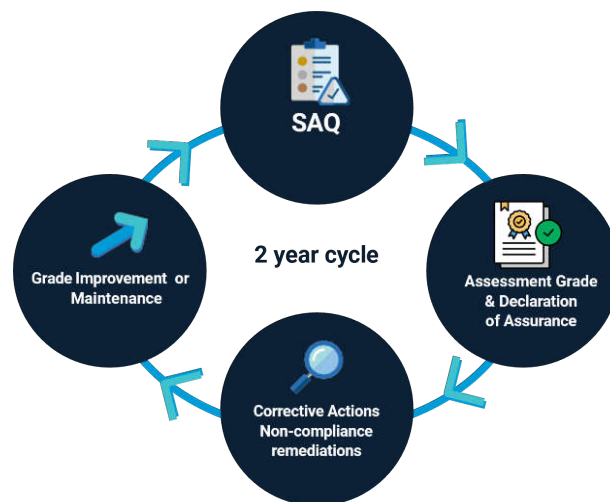
- identify non-compliance remediations to achieve or improve compliance
- provide guidance on international benchmarking standards
- agree on clear, measurable and time-framed corrective action items

Several non-compliances were identified during FY24 under our Program and became the subject of corrective action plans. However supplier non-compliances were predominantly related to health and safety, working hours and wages - not instances of modern slavery practices.

If a supplier refuses to complete remediation actions within agreed time-frames and Amotiv develops the view that the supplier is unwilling or unable to resolve a material modern slavery issue, then Amotiv would consider transitioning away from the supplier. This is considered a last resort and has been actioned historically. During FY24 there were no suppliers terminated for this reason.

Monitoring

Amotiv recognises that, without subsequent monitoring, there is a risk that standards may degrade after corrective action items are first implemented. The cyclic nature of Amotiv's due diligence activities enables ongoing monitoring of supplier risks and compliance post remediation.



1. The SMETA methodology is considered to be global best practice for social auditing and is conducted by affiliated audit companies (all being APSCA15 certified third party audit providers). The SMETA audits assess suppliers against local laws and the Ethical Trade Initiative Base Code (based on the United Nations International Labor Organisation Convention).

Supplier Site Visits

Some Amotiv suppliers are monitored through site visits at a frequency that varies depending on various factors including assessed risk level, prior audit findings and materiality. Amotiv businesses variously conduct site visits as part of the ordinary course of business and supplier relationship maintenance, at which they discuss with the supplier labour, welfare and supplier operational safety issues.

With the opening of the Asia Sourcing Office in January 2024, through its support for Amotiv businesses, the opportunity for site visits has increased. This provides an important monitoring mechanism for Amotiv businesses and has increased visibility of supplier practices and materially enhanced the Program.

Grievance Mechanisms

Grievance mechanisms are a valuable way for Amotiv to identify and monitor issues which can include human rights issues. Amotiv's Speak Up (Whistleblower Policy) applies to all Amotiv businesses. Amotiv has established an external whistleblower facility, which includes 24/7 online reporting (<https://www.whistleblowingservice.com.au/Amotiv-holdings/>) and telephone reporting during business hours. These mechanisms provide an important channel for Amotiv to understand whether modern slavery issues exist within its operations or supply chains.

In FY24 there were no whistleblower disclosures relating to modern slavery.

Mitigation

Mitigation of risk is achieved through early engagement and intervention before human rights impacts escalate to modern slavery. Raising awareness of modern slavery is a necessary part of this process.

Training

During the year, human rights related training, including training relating to modern slavery, was provided to various relevant Amotiv team members included:

- Online human rights (including modern slavery) training was completed by 124 team members (during the 12 months to August 2024). This training included personnel directly involved with implementation of the Program.
- Sedex seminars on Sedex SAQs, SMETA Audits, practical on-boarding guidance and topical issues associated with modern slavery and ethical sourcing management.

Capacity Building

Capacity building activities with our suppliers includes on-site awareness raising including:

- new supplier inductions
- supplier engagement in the Program through due diligence activities including liaison on corrective actions
- site-visits with suppliers

Identification of the amount of money spent with, and the length of relationship with, a supplier is a reasonable measure of Amotiv's leverage to obtain more assurances regarding human rights management and opportunities for capacity building as part of the ongoing relationship. In FY24, Amotiv businesses reported across the Group that approximately 60% of their goods supplier relationships exceeded 5 years. For some businesses, over 70% of supplier relationships exceeded 10 years. In Amotiv's view, the collaboration and alignment of goals with long term suppliers provides a particularly solid basis for partnering to achieve the goals of the Program.

Collaboration

Modern slavery is a global issue, and Amotiv recognises that effective mitigation often requires collaboration with downstream as well as upstream stakeholders. Close engagement and collaboration with our suppliers has been enhanced with the establishment of the Asia Sourcing Office in FY24. This is expected to deliver greater transparency and improved trust with suppliers, and accordingly better modern slavery risk management, over the medium to long term.

Amotiv businesses provide information about Amotiv's human rights programs and practices, including our Ethical Sourcing Program, at the request of our customers – such as original equipment manufacturers and large distributors of automotive parts and accessories.

Internally, the Ethical Sourcing Working Group collaborates regularly with Amotiv businesses. Annual reporting of modern slavery actions within the Group provides a particular opportunity for the Ethical Sourcing Working Group to discuss key challenges and learnings.

7. Effectiveness of our Actions

Amotiv uses a combination of quantitative and qualitative indicators to assess the effectiveness of its actions to address human rights impacts. The progress of the Program is measured each year through key performance indicators at a Group, Division and businesses level. These quantitative metrics are summarised below.

Program Activity (and measure)	Status
Annual Supply Chain Risk Mapping of tier 1 trade product suppliers	Completed annual supply chain mapping for FY24. Improved analysis to identify common suppliers to multiple businesses intra-Group transactions.
Engage suppliers in the Program (prioritised by risk and spend) <ul style="list-style-type: none"> Number of suppliers engaged % of supplier spend engaged 	Supplier engagement in the Program lifted to over 1,000 suppliers by the end of FY24, up from 628 in FY23 ¹ . Modern Slavery supplier assessments have now been completed for suppliers representing approximately 98% of tier 1 of the Group's spend on goods purchases.
Audits <ul style="list-style-type: none"> Number complete and % of supplier spend covered 	As at the end of FY24, 124 supplier sites had been validated by an audits ² over a two year cycle. These suppliers represent 31% of the Group's goods procurement spend at the end of FY24.
Suppliers meeting base level Amotiv assessment criteria	Suppliers representing 95% of the Group's Tier 1 goods procurement spend as at 30 June 2024 had been assessed over a 2 year rotation at basic level or above (up from 89% the previous year ³).
Supplier Non-compliances <ul style="list-style-type: none"> Number of reported modern slavery non-compliances 	There were no reported supplier non-compliances constituting modern slavery during FY24.
Amotiv Training <ul style="list-style-type: none"> Training completion rate 	124 team members undertook online training; 100% completed and passed.
Speak Up (Whistleblower) Policy <ul style="list-style-type: none"> Disclosures relating to modern slavery 	During FY25 there were no modern slavery related incidents reported through the whistleblower hotline or under the Speak-Up (Whistleblower) Policy.
Independent assessment platform onboarding for suppliers <ul style="list-style-type: none"> % of suppliers (by spend) on Sedex or an equivalent platform 	Supplier uptake of Sedex and equivalent schemes continued and at the end of FY24, suppliers representing 32% of goods procurement expenditure were using one of these platforms.
Policy, Process and Tools <ul style="list-style-type: none"> User feedback 	The Ethical Sourcing Working Group met regularly during FY24 to highlight implementation issues, taking a continuous improvement approach to the tools used to implement the Program. Active projects are now underway to update the modern slavery risk assessment methodology and Code during FY25.

1. Historical data around this metric can be found in the Sustainability Data section of the Amotiv website.

2. This includes audit visits by third party auditors, Amotiv team members and the Asia Sourcing Office.

3. As set out in the Group's 2024 Sustainability Review, which can be found starting at page 20 of [Amotiv's 2024 Annual Report](#).

Amotiv's policy commitment to human rights is reflected by transparency. Annually in its Sustainability Review, the Group reports on progress relating to the assessment of its supplier base under its ethical sourcing processes.

To achieve base level accreditation, a supplier must provide an Amotiv business with assurances that modern slavery practices (in the areas of: recruitment, child labour, debt bondage, human trafficking, hazardous work, forced labour and other slavery practices) do not exist in its business or supply chain. (To achieve higher level accreditation, a supplier must additionally achieve standards in areas such as health and safety, discrimination, environment and ethics.) Assurances are obtained via self-assessment and social compliance scheme assessments about the specific supplier (such as Sedex, Amfori BSCI or Ecovadis). The assessment process is performed on a 2 year rotation.

Accordingly those suppliers who meet base level accreditation under the Program have provided acceptable assurance around the absence of modern slavery. Pleasingly, this translates into the vast majority of our goods suppliers (by spend) having represented to our Group that they adequately manage modern slavery practices in their operations.

The Board intends to review and update the Code during FY25. The Board will consider the goals of the Program to ensure that it maintains momentum and efficiency in the future and remains fit for the changing Amotiv Group, its strategy and its stakeholders.

8. Consultation

The Amotiv businesses (including the reporting entities listed above) take a collaborative approach to implementation of the Program and development of the Modern Slavery Statement. Through various collaboration activities Amotiv, as the parent company, consults with, and works with, the other reporting entities within the Group, and they work with each other, to manage modern slavery risk across the Group's operations and supply chains.

The Supplier and Quality Council includes representatives from Amotiv Limited and from each Division. In particular, all Divisions (including the Group's global business operations) are represented on the Council. The Council has an Ethical Sourcing Working Group. Both the Council and the Ethical Sourcing Working Group provide valuable forums for consultation across the Group globally about modern slavery risk management and meet regularly to discuss and coordinate effective implementation of the Code. They provide Group businesses (including the reporting entities) with relevant policies, tools and materials to enable implementation of the Code.

Amotiv Divisions and businesses provide Amotiv with information on their identification and management of modern slavery risks in their operations and supply chains annually. This includes providing information about audit outcomes and corrective action plans relating to relevant suppliers as well as the individuals businesses' engagement with their supplier base about the Code.

The Asia Sourcing Office, since its creation in January 2024, has been engaged by a number of Divisions to provide "on the ground" modern slavery risk management services to help discharge activities required by the Code. The ASO collaborates with, and provides advice and assistance to the Divisions (including the reporting entities) about ethical sourcing activities and provides reports monthly to Amotiv about its delivery of ethical sourcing risk management services to the Group.

Key representatives from the Amotiv Group (including the reporting entities) were involved in, or contributed to, the preparation of this Statement including:

- Key members of the Executive Leadership Team, including the Managing Director & Chief Executive Officer, the Chief Risk Officer, the General Counsel & Company Secretary, the Chief Strategy, Sustainability and Innovation Officer;
- The convener of the Quality and Supplier Council and Ethical Sourcing Working Group; and
- The Senior Manager, Innovation and Strategy.



9. Other Information

The information in this section is relevant to the way in which the Group has established its systems and processes to manage and address modern slavery risks in its operations and supply chains.

Amotiv has taken into account the United Nations Guiding Principles on Business and Human Rights (**UNGP**) in designing and implementing its Program, including the modern slavery risk management aspects of that Program.

Amotiv understands the UNGP principle that there is a risk that businesses can be unwittingly linked to modern slavery practices through its actions or omissions. It accepts its responsibility to respect human rights and understands the UNGP principle that adverse human rights impacts (such as modern slavery) may be caused, contributed to or directly linked to businesses through their acts or omissions. Amotiv and the other reporting entities within the Group seek to avoid this through its Program which includes modern slavery risk management activities and applies to its own operations and its suppliers as described in this Statement.

In this regard, the scope of the Group's Program encapsulates standards and assurance about issues which may be indicators of the risk of modern slavery, reflecting the UNGP's continuum principle that modern slavery rarely exists in isolation.

The three core operational principles of UNGP are broadly addressed by the Amotiv Group in relation to modern slavery as follows:

UNGP core requirement	Amotiv Group
Policy Commitment	The Code has been in place since 2018, includes management of modern slavery risk and applies across the Group globally. It has been approved by the Amotiv Board. It is currently being reviewed as part of its regular review cycle. The Code is available publicly on Amotiv's website ¹ .
Human rights due diligence to prevent, mitigate and account for how businesses address their impacts on human rights	Amotiv has assessed its potential connection to modern slavery practices within the meaning of the UNGP in its own operations globally and its supply chains - this is disclosed above in section 6 of this Statement. Informed by that assessment, Amotiv conducts human rights due diligence activities in relation to its suppliers, including to identify prevent and mitigate modern slavery risks as set out in this Statement.
Processes to enable remediation	When the Group identifies non-compliances relating to modern slavery, it responds with corrective action plans with a view to remediation as set out in section 6 of this Statement.

1. Amotiv's Ethical Sourcing Code is available under the Corporate Governance tab on the Amotiv website.

Principal Governing Body Approval

This Modern Slavery Statement was approved by the Board of Amotiv Limited, being the principal governing body¹ of the reporting entities listed in section 1 above on 9 December 2024 and is signed by a responsible member² of Amotiv Limited.



Jennifer Douglas

Independent Non-Executive Director and
Chair of the Risk & Sustainability Committee
of the Board of Amotiv Limited

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1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph — a prescribed body within the entity, or a prescribed member or members of the entity.
 2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee — that trustee; or (c) if the entity is a corporation sole — the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001 — the administrator.



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