

# Modern Slavery Statement 2025

australianmotoring**services**

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## Acknowledgement of Country

We acknowledge the traditional owners of the land where we operate and work. We recognise their continuing connection to land, waters, and culture. We pay our respects to their elders' past, present and emerging.

## Statement on Reporting Entities

This statement has been made on behalf of Australian Motoring Services Pty Ltd. This statement covers all entities owned or controlled by Australian Motoring Services Pty Ltd.

**ABN 60 100 488 613**

## Mandatory Reporting Criteria of the Modern Slavery Act

This statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018. The table below identifies where each criterion of the Act is disclosed within sections of this Statement.

<b>MSA Criteria</b>	<b>Reference in this Statement</b>
Identify the reporting entity	<a href="#">Pages 1, 3</a>
Describe the reporting entity's structure, operations, and supply chains	<a href="#">Pages 4, 5, 6</a>
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	<a href="#">Pages 7 to 9</a>
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	<a href="#">Pages 10 to 22</a>
Describe how the reporting entity assesses the effectiveness of these actions	<a href="#">Pages 23, 24</a>
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	<a href="#">Pages 24, 25</a>
Provide any other relevant information	<a href="#">Pages 27 to 29</a>

## 1.0 About AMS

Australian Motoring Services Pty Ltd (“**AMS**”) is a joint venture of Australia’s motoring clubs - NRMA, RACV, RACQ, RAA, RAC, and RACT (“**Motoring Clubs**”). AMS delivers smart, connected motoring solutions for businesses across roadside assistance, battery services and more. As the wholesale arm of the motoring clubs, AMS gives businesses access to Club partnerships - helping deliver value to Club members while extending trusted benefits to new customers. It also owns and operates Chargefox, Australia’s largest public EV charging network. Backed by a trusted legacy and national scale, AMS helps drivers reach their destinations safely and reliably.

AMS is the parent company that owns and controls, with the exception of AA Motoring Battery Service Ltd, the following operating entities which together form the AMS group:

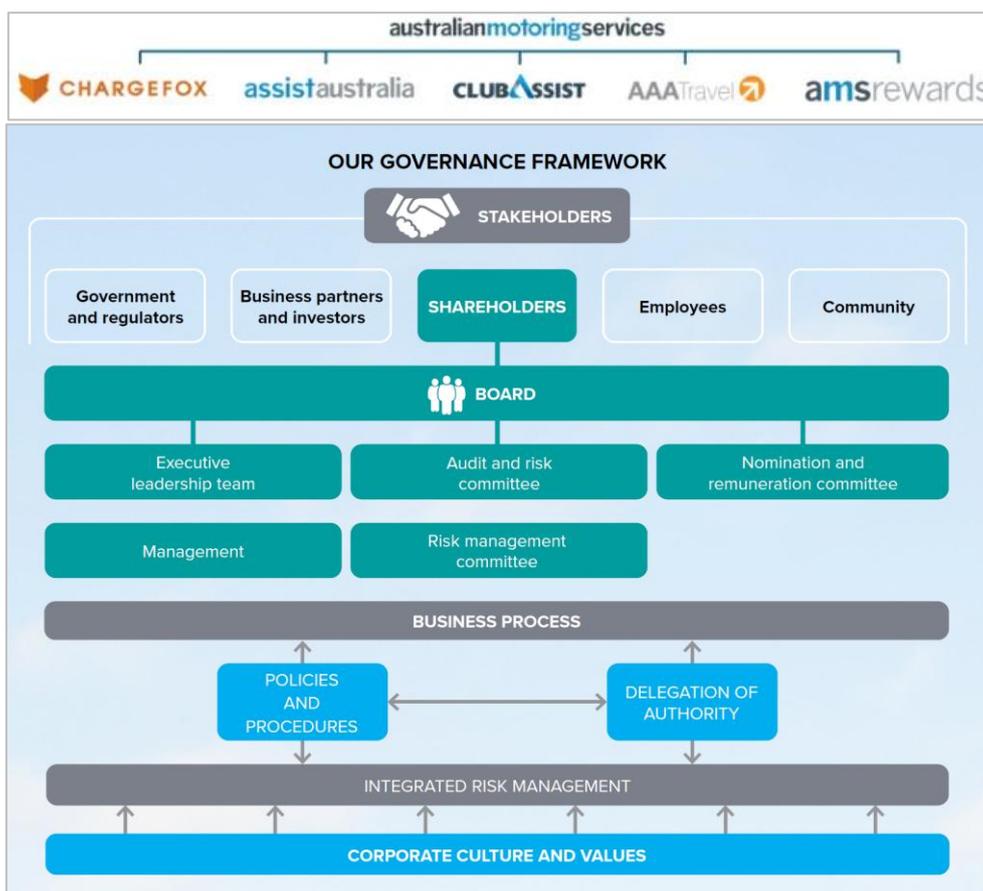
<b>Company Name</b>	<b>Core Business / Purpose</b>
<b>Australian Motoring Services Pty Ltd</b>	Incorporated Joint Venture – Holding entity
<b>Assist Australia Pty Ltd</b>	Roadside assistance services
<b>Chargefox Pty Ltd</b>	Electric vehicle charging station management, charging services
<b>Club Assist Pty Ltd</b>	Procurement, distribution, roadside assistance service and supply of batteries
<b>Club Assist North America Pty Ltd</b>	Holding company for North American entities, procurement, distribution, and supply of batteries
<b>AMS Rewards Pty Ltd</b>	National partnerships on behalf of the Motoring Clubs
<b>AAA Travel Pty Ltd</b>	National Travel Insurance and Car Rental partnerships on behalf of the Motoring Clubs
<b>AAA Tourism Pty Ltd</b>	(Non-trading company)
<b>Club Assets Pty Ltd</b>	(Non-trading holding company)
<b>Club Consortium Pty Ltd</b>	(Non-trading holding company)
<b>Club Assist Corporation Pty Ltd</b>	(Non-trading holding company)
<b>Assist NZ Limited</b>	Roadside assistance services in New Zealand
<b>AA Battery Service Limited</b>	Joint Venture with NZ AA and Club Assist
<b>Chargefox Limited</b>	Electric vehicle charging station management in New Zealand

For the purposes of this statement, **AMS** will refer to Australian Motoring Services Pty Ltd and its Australian subsidiaries and **AMS Group** will refer to Australian Motoring Services Pty Ltd and all of its subsidiaries, including its international subsidiaries.

All of the AMS Group has been consulted in relation to the contents of this statement. The above individual entities are specifically referenced where appropriate through this Statement to provide more accurate information in relation to a reporting requirement.

## 2.0 AMS Structure & Governance

### AMS organisational structure



The AMS Group Board is made up of the Chief Executive Officers of each of our shareholder mobility clubs – Royal Automobile Club of Victoria (RACV), Royal Automobile Club of Queensland (RACQ), Royal Automobile Club of Tasmania (RACT), Royal Automobile Association of South Australia (RAA), National Roads and Motorists’ Association (NRMA) and the Royal Automobile Club (RAC). Our board meets four times a year.

There are three Board committees – Audit, Risk and Compliance, Health, Safety and Wellbeing and Remuneration Committees. The Audit, Risk and Compliance, and Health, Safety and Wellbeing Committees meet three times per year, and the Remuneration Committee meets twice a year.

The Audit, Risk and Compliance Committee is chaired by David Carter, the CEO of RACQ, and there are three other Executives from the motoring clubs as the other members of the committee. The Audit, Risk and Compliance Committee receives regular updates on compliance matters, including Modern Slavery. These briefings are also provided to the Board.

AMS Group holds a quarterly Modern Slavery Global SteerCo meeting with colleagues from Club Assist North America and New Zealand Battery Services to monitor and discuss Modern Slavery risks and trends in our respective regions.

### **3.0 Statement from our Chairman**

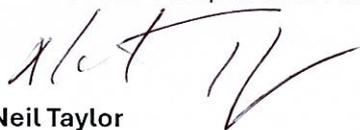
We are pleased to present the first Modern Slavery Statement for the Australian Motoring Services Pty Ltd group. On 1 July 2024, Club Assist Corporation Pty Ltd (“**Club Assist**”) was acquired by Australian Motoring Services Pty Ltd. Club Assist has previously made five Modern Slavery statements. AMS recognises that modern slavery can be hidden in plain sight and take on many forms. Modern Slavery practices include slavery, servitude, forced labour, deceptive recruiting, forced marriage, debt bondage, human trafficking and the worst forms of child labour (“**Modern Slavery**”) and we are proud to build on the strong foundations with systems to identify, address and mitigate the risks of Modern Slavery in our business operations and supply chain. On behalf of the board of the Australian Motoring Services group, I pledge our commitment to assessing, addressing and mitigating the risks of Modern Slavery in our operations and supply chain.

We respect the human rights of all people involved in our operations and supply chain and do not tolerate any form of exploitation or Modern Slavery. We are committed to creating value for all stakeholders and upholding labour and employment laws in all areas in which we operate.

This statement outlines the steps taken by the AMS Group in FY25 to assess the risks of Modern Slavery and to implement a practical risk mitigation strategy. It builds upon the work already undertaken by Club Assist and demonstrates continuous improvement in our processes.

We are committed to managing Modern Slavery risks across our operations both in Australia and globally. We are dedicated to conducting our business responsibly, sustainably and to a consistent high standard and we hold our suppliers to the same standard.

This statement was approved by the board of directors of Australian Motoring Services Pty Ltd and the AMS Group at the board meeting on 20 November 2025.



**Neil Taylor**  
**Chair, Australian Motoring Services Pty Ltd**

## 4.0 AMS Risk Profile in Operations and Supply Chain

### 4.1 Operational risks profile

AMS Group is a newly consolidated group that builds on more than 30 years of safely and sustainably delivering roadside assistance and battery services. With the recent acquisition of Chargefox, AMS now also provides access to one of Australia's largest electric vehicle charging networks, reinforcing our role in mobility solutions. We comply with all labour, employment, immigration, and whistle-blower legislation in Australia and its states and territories, including the Fair Work Act. AMS is committed to:

- The safety and wellness of our employees and contractors
- A workplace free from harassment, discrimination, and bullying
- Ensuring diversity, equity and inclusion in our operations and business dealings
- Recognising and protecting fundamental human rights
- Acting ethically and lawfully in all business conduct
- Engaging with our stakeholders respectfully and honestly
- Building sustainable communities through providing local jobs, developing local skills and providing local business opportunities

Our governance framework, corporate policies, training programs and dedicated risk management initiatives underpin our commitment to addressing Modern Slavery risks. While the risk of AMS directly causing or contributing to Modern Slavery is assessed as low, we acknowledge that vulnerabilities exist within aspects of our operations and supply chain. This includes services such as cleaning, security, facilities management, and labour hire.

### 4.2 Supply chain risks profile

AMS recognises that, as a newly consolidated group, we are still in the discovery phase of developing a unified Modern Slavery risk profile across our operations and supply chain. Part of our maturity journey will be to progressively strengthen our visibility and controls. A key initiative in this process for FY26 is to leverage on Ethixbase360 platform, a global subscription-based compliance portal that includes Modern Slavery Questionnaire functionality to strengthen supplier due diligence and compliance monitoring.

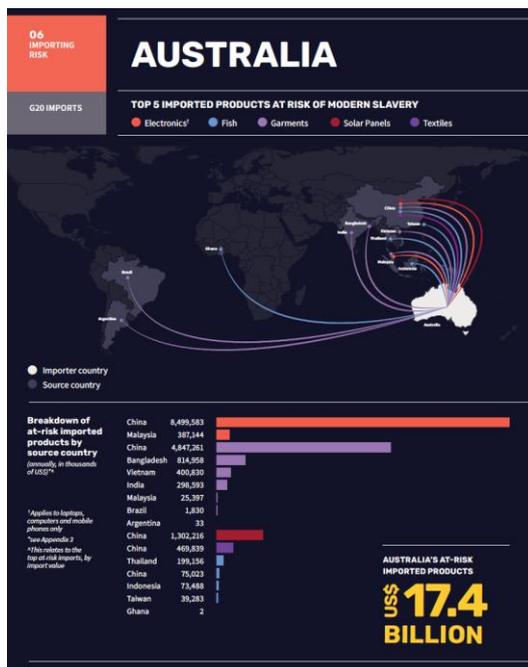
Batteries represent one of the most material categories in AMS's supply chain, accounting for approximately 21.7% of total group spend. Given the international nature of battery sourcing and the known exposure of this sector to labour rights risk, AMS recognises the need for proactive management in this area. Publicly available databases, including the Global Slavery Index, currently do not classify imported commodities such as lead-acid batteries among the highest-risk product categories. However, battery and clean energy supply chains are increasingly scrutinised for labour rights issues. Global battery manufacturers often rely on supply chains that traverse regions such as China (including XUAR) and the Philippines, both of which have been associated with heightened labour rights risks. KPMG and the Australian Human Rights

Commission highlights that as energy and resources sectors decarbonise, their supply chains are becoming more complex and intertwined, creating new vectors for Modern Slavery.<sup>1</sup>

We accept the absence of classification in a high-risk list does not equate to the absence of risk. For AMS, this means proactively assessing potential exposure in areas such as:

- Conflict associated with mining of minerals (e.g., cobalt, nickel, tungsten)
- Products coming from higher-risk regions, where labour rights violations have been identified
- Local suppliers of AMS that import directly, where upstream visibility of sourcing is limited

The following diagram shows data of imported products at risk of Modern Slavery, outlining top at-risk products, source countries and supply chain linked to Modern Slavery concerns.



**Table 41**  
Final list of products at risk of modern slavery by source country.

Product	Source countries
Bricks	Afghanistan, Myanmar, Cambodia, China, India, Nepal, North Korea, Pakistan, Russia
Garments	Argentina, Brazil, China, India, Malaysia, Thailand, Viet Nam, Bangladesh
Fish	China, Ghana, Indonesia, Thailand, Taiwan
Cotton	Benin, Burkina Faso, China, Kazakhstan, Pakistan, Tajikistan, Turkmenistan
Gold	Burkina Faso, Democratic Republic of the Congo, North Korea, Peru, Venezuela
Timber	Brazil, North Korea, Peru, Russia
Carpets	India, Nepal, Pakistan
Coal	China, North Korea, Pakistan
Cattle	Bolivia, Brazil, Niger, Paraguay, South Sudan
Sugarcane	Bolivia, Brazil, Myanmar, Dominican Republic, Pakistan
Rice	Myanmar, India, Mali
Cocoa	Côte d'Ivoire, Nigeria, Ghana
Electronics	China, Malaysia
Palm oil	Indonesia, Malaysia
Textiles	China, North Korea
Brazil Nuts/Chestnuts	Bolivia, Peru
Coffee	Brazil, Côte d'Ivoire
Diamonds	Angola, Sierra Leone
Embellished textiles	India, Nepal
Shrimp	Myanmar, Thailand
Stones	India, Nepal
Thread/Yarn	China, India
Solar Panels	China

Figure 1: Data from Global Slavery Index (2023) by Walk Free

In addition, logistics and warehousing services in Australia present a risk due to the use of agency and temporary labour, where there is evidence of underpayment and unsafe working conditions in the wider sector. Ancillary services such as cleaning and maintenance have also been identified by the Australian Government as high-risk categories, reflecting the vulnerability of subcontracted and migrant workers in these industries. Assist Australia Pty Ltd, being the roadside services arm of AMS, procures that the Motoring Clubs, AANT and Club Assist Pty Ltd provide roadside assistance services from time to time. These entities are in most cases reporting entities themselves and have published previous modern slavery statements. Through contractual conditions, Assist Australia ensures compliances, and completes ad hoc questionnaires and investigations with the Motoring Clubs to ensure Modern Slavery compliance.

<sup>1</sup> Supporting business to combat modern slavery | Australian Human Rights Commission

### 4.3 Group-Wide Gap Analysis

AMS commissioned an independent consultant to conduct an Australian-group wide Modern Slavery Gap Analysis. This was the first time AMS assessed its Modern Slavery risk profile at a consolidated group level, reflecting our transition from entity specific reporting to a whole of business approach.

The purpose of this analysis was to:

- Identify the current state across:
  - Governance
  - Supply Chain Management
  - HR and Training
  - Risk Management
  - Stakeholder Engagement
- Highlight opportunities for improvement in how AMS identifies, mitigates and reports on Modern Slavery risk.
- Set out proposed actions that will form the foundation of our Modern Slavery program for FY26 and beyond.

### **Key Findings**

The analysis confirmed that AMS has a solid foundation, but it also identified several important gaps where greater consistency is needed.

Business Area	Key Findings	Opportunities & Actions
<b>Governance</b>	Awareness exists at Board / SLT level but with limited integration into decision-making and reporting	Introduce quarterly Board reporting; expand the Modern Slavery Global SteerCo; align governance with AMS wide compliance framework; embed accountability into executive KPI's
<b>Supply Chain Management</b>	Procurement and supplier screening not applied consistently across all entities	Implement Ethixbase360 screening; embed Modern Slavery clause in procurement/contracts; standardise supplier due diligence; ensure uniform risk escalation process
<b>HR &amp; Training</b>	Uneven awareness of Modern Slavery risks; Training is not consistently rolled out	Develop group wide LMS modules covering Modern Slavery, ESG and grievance handling; integrate into onboarding and refresher training; ensure board directors and senior manager complete tailored training
<b>Risk Management</b>	Modern slavery not fully embedded in group risk frameworks or registers	Incorporate Modern Slavery into Group Risk Register; establish monitoring and reporting protocols; link risk management directly to procurement and supplier management
<b>Stakeholder Engagement</b>	External communication and grievance mechanisms in foundational level	Review and strengthen grievance channels, align complaint handling; create Modern Slavery communication strategy

By undertaking this gap analysis, AMS has created a baseline from which to measure progress year on year. The process has provided a clearer picture to where improvements are required, as

well as a roadmap of opportunities and actions that will help AMS move towards a more mature, consistent and group wide approach to managing Modern Slavery risk.

### 5.0 2024 Modern Slavery Statement Lodged

Our wholly owned subsidiary, Club Assist Corporation Pty Ltd has previously made five Modern Slavery statements. This is the first Modern Slavery statement for the consolidated Australian Motoring Services Group. The previous statements by Club Assist can be accessed [here](#).

### 6.0 Summary: FY25 Modern Slavery Risk Management Initiatives

In FY25, AMS advanced its Modern Slavery program by maintaining a structured and systematic approach across five core initiatives.

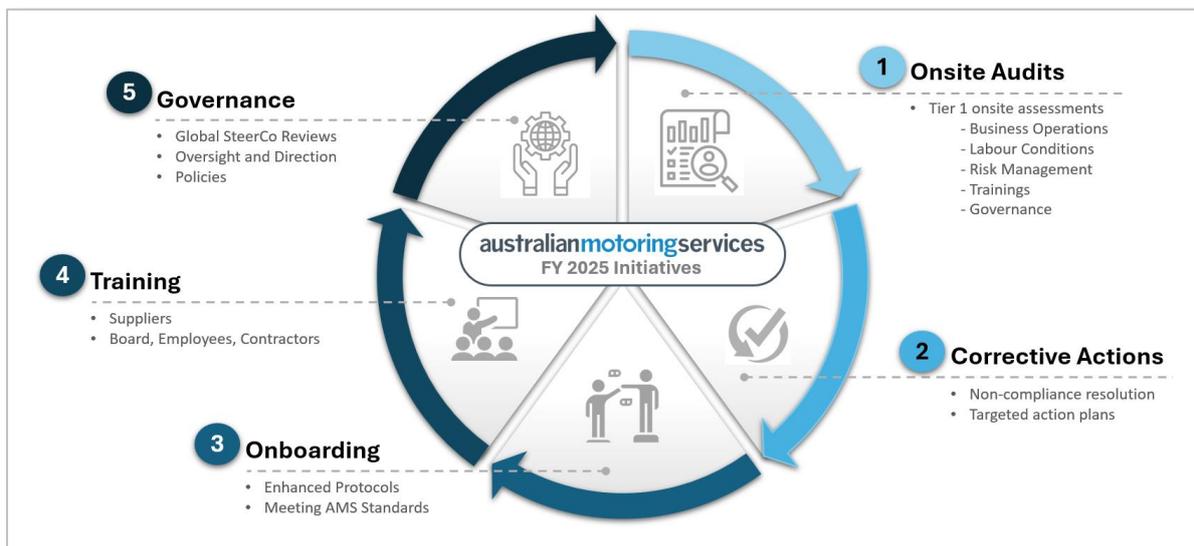


Figure 2: AMS Modern Slavery Risk Management Program

**Onsite Audits:** Onsite assessments and audits of Tier 1 suppliers reviewed business operations, labour conditions, risk management, training, and governance with focus on living wages, child labour, working hours, and fair treatment.

**Corrective Actions:** Focused on Non-Compliance resolutions in collaboration with suppliers through targeted action plans.

**Onboarding:** Enhanced protocols in contract management ensured new suppliers met AMS Modern Slavery standards.

**Training:** Employees, contractors, and Board members completed formal training.

**Governance:** Quarterly SteerCo reviews provided oversight and direction for continuous improvement.

### 1. Key Tier 1 suppliers onsite audits

AMS strengthened its approach to risk assessment by integrating onsite assessments and audits into our supplier oversight program. These measures help identify, evaluate, and mitigate potential Modern Slavery risks, and serve as key tools for validating supplier compliance, guiding corrective actions, and upholding ethical standards across our supply chain.

AMS continued its onsite audit program in partnership with Verisio, an independent audit provider of ethical trade and compliance audits with a strong track record in the Asia-Pacific region. Verisio applied a structured methodology aligned to recognise ethical compliance standards, combining site inspections, document reviews and confidential worker interviews to build a holistic assessment of supplier practices utilising the assessment dimensions prioritised by AMS.

This year, audits were conducted across our three primary suppliers in South Korea. Each audit followed a two-day onsite process, with findings addressed through corrective actions plans agreed between AMS, Verisio and the supplier. All identified non-compliances, and partial compliances were collaboratively closed out by 30 June 2025.

In parallel, AMS made a strategic sourcing adjustment, contracting with a fourth supplier, a new partner in the Philippines. This supplier will enter the onsite audit cycle for the next reporting period, ensuring consistent oversight is applied across all key suppliers.

### 2. Corrective & closure of actions

AMS advanced its closure of corrective actions by aligning our practices more closely with industry benchmarks for Modern Slavery risk and global frameworks such as the United Nations Guiding Principles and the Organisation for Economic Co-operation and Development guidance. While evidence collection and verification have always been integral to our process, this year we placed greater emphasis on timeliness, traceability and long-term integration of corrective measures.

Corrective actions were tracked against agreed timeliness, with closure monitored through quarterly review checkpoints, a cadence consistent with best practice observed in Australian Modern Slavery statements. By 30 June 2025, all non-compliance and partial compliance issues identified during previous audits were closed, with AMS ensuring transparency and accountability by requiring suppliers to provide regular updates and supporting documentation to demonstrate progress. AMS has been responsive and proactive in setting and driving a higher standard of assurance across our supply chain.

### 3. Onboarding of new Tier 1 supplier

AMS's experience with previous supplier engagements reinforced the importance of strong pre-engagement due diligence, particularly in identifying and addressing Modern Slavery risks. These lessons directly shaped our approach to onboarding a new Tier 1 supplier from the Philippines ("**Supplier D**"), ensuring that resilience and diversification were pursued without compromising on ethical standards.

AMS implemented a more rigorous methodology to assess new suppliers, including desktop reviews, supplier self-assessments, targeted risk screening, and independent onsite audits. By

embedding these enhanced checks, we ensured the new supplier met both commercial expectations and Modern Slavery requirements, demonstrating how past learnings have matured our approach to responsible sourcing.

#### **4. Training & continuous learning**

AMS continued to reinforce its commitment to combating Modern Slavery across the organisation by delivering structured training programs across the organisation via our online learning platform. As this is the first year of reporting for AMS, these training programs were delivered to all AMS employees who had not previously undertaken Modern Slavery training, ensuring a consistent baseline of awareness and understanding. To extend this reach, training was also made available to our contractors, reflecting AMS's broader commitment to ethical practices throughout our operations and supply chains.

The training curriculum was refreshed and standardised to include four core modules:

- Understanding Modern Slavery
- Identifying Supply Chain Risks and Exposure
- Legislative Requirements and Compliance Obligations
- Responding to Instances of Modern Slavery

Additionally, all members of the AMS Board completed specialised training tailored to their governance and oversight responsibilities, reinforcing leadership accountability in addressing Modern Slavery risks.

#### **5. Continuous governance**

AMS strengthened governance of its program through the Modern Slavery Compliance and Risk Committee (Global SteerCo). Membership was updated to ensure representation across all AMS entities, including AA Battery Service (AABS) and Club Assist North America (CANA), supporting a coordinated group-wide approach. Meeting quarterly, the Global SteerCo provides strategic direction, monitors progress against action plans and ensures alignment of Modern Slavery risk management across operations and the supply chain.

Modern Slavery is now embedded as a standing compliance priority. It is consistently addressed and supported by structured monitoring of regulatory and industry developments. Updates are sourced through multiple channels, including Lexis Nexis compliance alerts, and are reviewed to assess their relevance to AMS operations. Key insights are escalated to the Risk Management Committee and translated into actions where required. This approach ensures Modern Slavery oversight is not only consistent but responsive to evolving expectations.

## 7.0 FY25 Modern Slavery Risk Management Initiatives

### 7.1 Key Tier 1 Suppliers

#### Multi-year trajectory findings (FY21 → FY25)

AMS has embedded onsite social audits as a core part of our Modern Slavery risk management program. Over five consecutive years, these audits have provided a transparent measure of supplier performance and effectiveness of corrective actions. The results confirm that a consistent methodology, coupled with supplier engagement is delivering measurable improvement.

- Overall non-compliances fell 46.4% (from 28 in FY21 to 15 in FY25).
- By supplier (FY21 → FY25 total change):
  - Supplier C: -66.7% (9 → 3) — Representing the steadiest improvement.
  - Supplier B: -55.6% (9 → 4) — improved, but severity shifted, which is concerning and will need to be addressed
  - Supplier A: -20.0% (10 → 8) — improved vs FY21 but plateauing in the last two years.

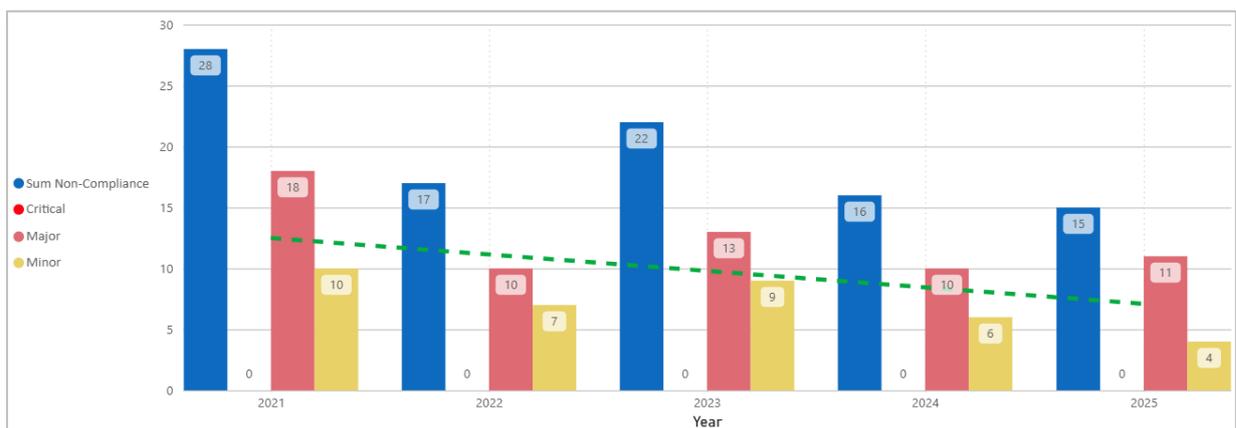


Figure 3: Audit Results FY21 – FY25 (YoY)

#### Continuing the Approach in FY25

In FY25 we commissioned full ethical (social) audits aligned to the Ethical Trading Initiative (ETI) Base Code with a Modern Slavery review, conducted by Verisio utilising document review, worker and management interviews, and direct observation—performed by CSCA-certified lead auditors.

AMS continues to partner with Verisio who specialise in factory social audits, inspection management, and supply chain due diligence, with methodologies aligned to the ETI Base Code and international standards including ISO 9001, ISO 14001, ISO 45001, and IATF 16949.

A key Verisio strength is their worker-centric methodology which combines confidential employee interviews and direct floor-level observations. This provides a more accurate view of working conditions than desk-based assessments alone. AMS's onsite audit methodology assessed supplier practices across five key areas shown below:



The assessment areas are illustrated in detail in the diagram below:

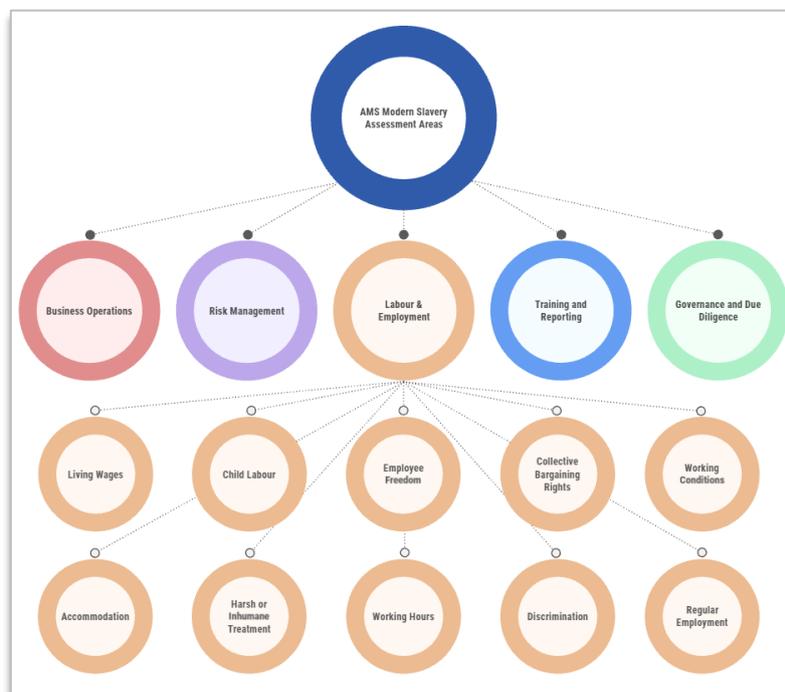


Figure 4: AMS Modern Slavery Assessment Areas

Prior to the onsite audits, AMS worked closely with its Tier 1 suppliers to ensure that the audit process was clearly communicated and for suppliers to be well-prepared. Suppliers were notified in advance of the audit schedule and provided with detailed guidance on the scope, documentation requirements, and the audit methodology to be applied by Verisio. This included pre-audit questionnaires, requests for key policies and records, and confirmation of workforce data to enable a representative assessment. By setting clear expectations upfront, AMS reinforced transparency and accountability while giving suppliers the opportunity to prepare and engage constructively in the process. Importantly, while suppliers were engaged in the planning,

the audits themselves were conducted independently by Verisio, ensuring objectivity and integrity of the findings.

Between October and December 2024, three onsite social audits were completed on Tier 1 battery suppliers in South Korea. Supplier C on the 17–18 October 2024, Supplier B on 21–22 October 2024 and Supplier A on the 2– 3 December 2024. Covering large-scale facilities with an average workforce of nearly 500 employees and production areas of around 87,000sqm, these audits provided AMS with a comprehensive view of working conditions and Modern Slavery risks across the core battery supply chain.

## **Findings**

### **Supplier A: Grade C**

- Facility profile: large-scale automotive lead-acid battery plant (~98,400 m<sup>2</sup>; 442 workers).
- Non-compliances: 8 (2 minor, 6 major).
- Key findings:
  - *Governance*: incomplete Tier-2 supply chain mapping and risk assessment.
  - *Health & Safety*: PPE inconsistencies, blocked electrical panel, gaps in chemical containment, forklift key left in equipment, incomplete MSDS postings.
- Certifications: ISO 9001, 14001, 45001; IATF 16949.

### **Supplier B: Grade C**

- Facility profile: battery production complex (~85,000 m<sup>2</sup>; 311 workers).
- Non-compliances: 4 (all major).
- Key findings:
  - *Labour Standards*: no ethics/Modern Slavery training delivered to production workers.
  - *Governance*: no Tier-2 supply chain risk assessment; no communication of human rights expectations to suppliers.
  - *Health & Safety*: emergency exit signage mislabelled.
- Certifications: ISO 14001, 45001; IATF 16949.

### **Supplier C: Grade C**

- Facility profile: large automotive battery facility (~78,600 m<sup>2</sup>; 729 workers).
- Non-compliances: 3 (2 minor, 1 major).
- Key findings:
  - *Governance*: risk assessment incomplete; Tier-2 mapping not fully conducted.
  - *Health & Safety*: forklift key left in equipment, signalling weak safety controls.
- Certifications: ISO 9001, 14001, 45001, 22301; IATF 16949.

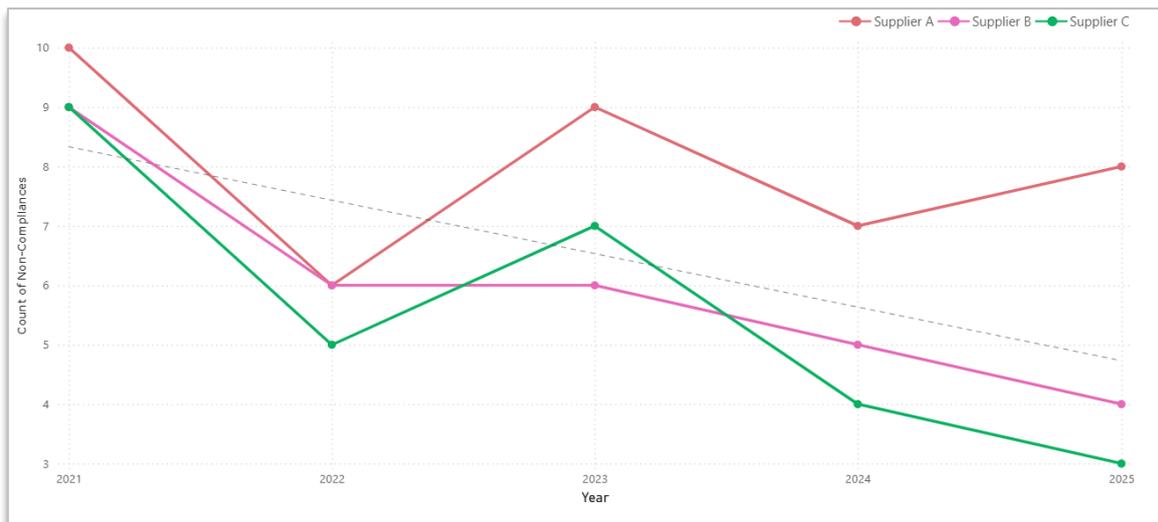


Figure 5: Non-Compliances by Supplier FY21-FY25

### Supplier A

*FY24 →FY25: slight increase (7 →8), with majors steady at 6 but minors gradually increasing.*

Supplier A demonstrates incomplete embedding of corrective actions, especially in health & safety and shop-floor controls (e.g. forklift safety, chemical handling, electrical panel access). While the issues are not escalating into critical risks, they are recurring — signalling that management systems exist on paper but are not yet consistently enforced at the operational level. This supplier requires more hands-on engagement and evidence-based verification in FY26.

### Supplier B

*FY24 →FY25: further reduction (5 →4), but all non-compliance are majors.*

Supplier B shows progress in lowering the overall number of issues, however the concentration of findings in the major category indicated that governance, training and control effectiveness still need deeper embedding. Tier 2 risk assessment/communication signals the need for continued reinforcement and verification through FY26.

### Supplier C

*FY24 →FY25: further reduction (4 →3), but severity worsened (minors 4 →2, majors 0 →1).*

Supplier C's stable headline numbers mask a worrying shift in severity. The transition from minor lapses to major non-compliances indicates systemic weaknesses in governance and training cascades. Policies are in place, but they are not reaching production workers, leading to higher-risk findings (e.g. lack of ethics training, weak Tier-2 mapping, inaccurate signage). This suggests a capability and culture gap rather than paperwork deficiencies.

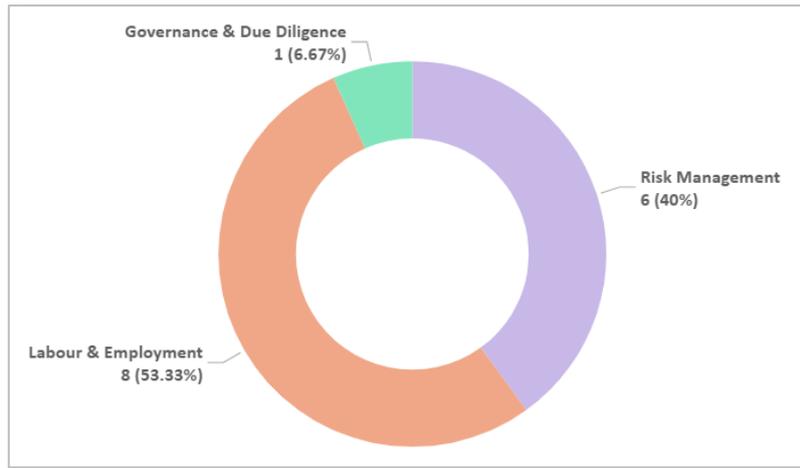


Figure 6: Non-Compliance Areas (2025)

### Insights:

Tier 2 visibility is the systemic gap. All three suppliers lacked full supply chain risk mapping, especially in relation to recycled lead inputs, highlighting the need for stronger Tier 2 engagements in FY26.

Operational safety lapses signal maturity risks. PPE non-compliance, signage errors and chemical handling gaps may not be direct indicator of Modern Slavery but demonstrate weakness in management controls – correlated with high risk of labour rights violations.

Training and communication remain uneven. At Supplier B, frontline workers had not received ethics training, showing the policies are not always cascaded effectively.

### 7.2 Corrective Actions & Closure of Audits

All audit findings were closed by 30 June 2025, with corrective actions tracked and verified against the five assessment dimensions. With labour standards and human rights, the primary challenge was training gaps, most notably at Supplier C where no worker-level ethics or Modern Slavery training had been delivered at the time of audit. Corrective actions required full rollout of training modules, supported by attendance logs as evidence. While all suppliers closed these actions, the timing and depth of implementation varied, with Supplier C trailing behind its peers in embedding the training into day-to-day practice.

In health and safety, several recurring operational lapses were identified. Corrective actions involved updated standard operating procedures, retraining programs, and the institution of monthly floor-level inspections. Closure of corrective actions was achieved with time-stamped photographic evidence from all three suppliers. However, repeated minor findings at Supplier A suggest that while the policies and controls are in place, they are not yet consistently enforced across operations.

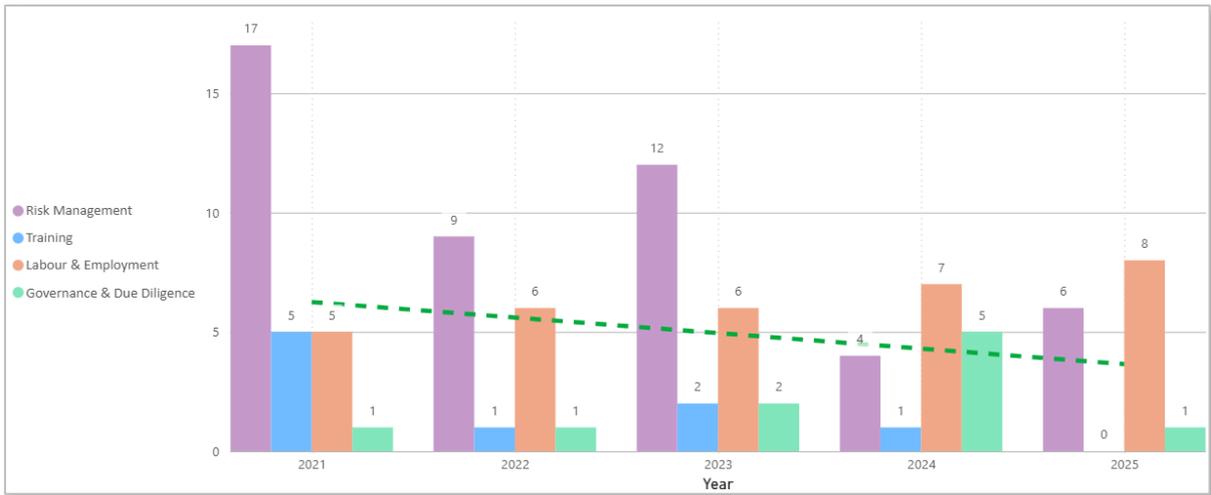


Figure 7: Trend of Non-compliance Areas

Environmental management findings were more limited, focusing largely on hazardous material storage and the posting of safety data sheets (MSDS). These were rectified through strengthened containment protocols and the completion of MSDS postings. All corrective actions in this dimension were closed efficiently, marking it as one of the most straightforward areas to address.

Governance and supply chain risk management represented the most systemic weakness across all three suppliers. Supplier B responded by completing its risk mapping within the reporting year, while Supplier C required extended engagement and multiple rounds of evidence submission. Although all suppliers marked these items as closed, the depth and quality of implementation varied, with Supplier C’s outputs being less mature. This will be a continued focus area for FY26.

Within management systems and ethics, the audits highlighted deficiencies in the communication of human rights policies and inconsistent manager-level training. Corrective actions included policy updates, refreshed governance documentation, and the collection of acknowledgements from managers and staff. Although suppliers submitted documentation to confirm closure, verification indicated that corrective actions were implemented inconsistently, with some areas showing partial or surface level adoption. Supplier B demonstrated clear ownership of the process, whereas Supplier C’s compliance was more formal than cultural.

Taken together, the closure of FY25 corrective actions demonstrates that AMS’s program not only ensures timely remediation but also exposes deeper governance and training gaps as the program matures. Supplier B continues to serve as a benchmark for how corrective action processes can embed lasting improvements, Supplier A has closed its findings but requires closer monitoring to ensure health and safety controls are consistently enforced, and Supplier C, while closing all actions on paper, requires more focused engagement in FY26 to ensure governance reforms and training reach the operational level.

### 7.3 Onboarding of New Tier 1 Supplier (Supplier D)

AMS reflected on its experience with a previous supplier from China. This engagement underscored a critical lesson where robust Modern Slavery due diligence must occur before entering further discussions on price or product quality. Guided by this learning, AMS applied a more rigorous approach in onboarding Supplier D, a Tier 1 battery supplier based in the Philippines. Supplier D is a leading battery manufacturer, with ISO-9001, ISO-14001 and IATF-16949 certifications across its operations and footprint extending into North America and Australia.

Before formal engagement, AMS commissioned Verisio to conduct a social and environmental review of Supplier D.



The image shows a screenshot of a Verisio audit report. The Verisio logo is at the top right. The report contains the following information:

Field	Value
Company Number	PW00000378
Date	05/10/2024
Parent Company	"Supplier D"
Address	Quezon City, Metro Manila, Philippines

Figure 8: "Supplier D" Audit report

The report included checks on:

- Organisation profile and group of companies including subsidiaries
- Global media checks
- Sanction screenings
- Jurisdictional risk assessment
- ESG alerts

While a historical environmental concern was noted regarding a plant previously situated near a river (closed in 2012), Supplier D's relocation to a certified industrial estate resolved the issue. No Modern Slavery red flags or sanctions were identified, and the overall profile was favourable. The new plant is certified ISO compliant for Environmental and Safety management.

#### **Beyond the Audit: Seeing First-Hand**

Building on this independent assurance, AMS in collaboration with Club Assist North America, who form part of the Global SteerCo, undertook an in-person visit to Supplier D's facility in the Philippines. The delegation included:

<b>Luke Maunsell</b>	EGM Operations (AMS)
<b>Dojo Esquivel</b>	GM Supply Chain (AMS)
<b>John Tutt</b>	President & CEO (Club Assist NA)
<b>Jeremiah Cordovano</b>	COO (Club Assist NA)
<b>Chris Eckert</b>	SVP Supply Chain (Club Assist NA)

The visit served a twofold purpose: to validate our audit findings and to personally assess working conditions, operational practices and environmental safeguards. The visit encompassed an overview of factory floor operations, workforce provisions, technology and systems and the company’s approach to environmental sustainability. The direct engagement not only reinforced confidence in Supplier D’s practices but also deepened AMS’s understanding of supplier culture, transparency and readiness to align with AMS’s Modern Slavery commitments.

#### **7.4 Continuous Learning through LMS**

A key initiative during the current reporting period was the targeted delivery of Modern Slavery risk management training to all AMS leaders and their respective teams. This effort aimed to deepen understanding of Modern Slavery, identify potential risk areas within AMS operations and supply chains, and reinforce the organisation’s commitment to ethical and responsible business practices.

Our Learning & Development (L&D) department, in close collaboration with the Supply Chain team, continued to deliver structured online training modules – a program that has been in place for several years. Each module is designed to be concise and accessible, requiring approximately 15 to 20 minutes to complete and concluding with a short quiz to reinforce key learnings.

The following modules were launched or refreshed during this reporting period:

- Modern slavery module 1: What is Modern Slavery?
- Modern slavery module 2: Modern slavery in the workplace
- Modern slavery module 3: Business relevance

Training participation reached 99% across the organisation, marking a notable increase from the previous year’s 96% completion rate. This high level of engagement reflects AMS’s proactive approach to embedding awareness and accountability throughout the organisation. Importantly, the training modules were also extended to contractors, underscoring that these modules are not merely a compliance requirement within the LMS, but a vital component of AMS’s broader policy framework and ethical standards.

Modules	Employees			Contractors			Overall Completion Rate
	Registered	Completed	Completion Rate	Registered	Completed	Completion Rate	
<b>Modern Slavery</b>	147	147	<b>100%</b>	-	-	-	<b>100%</b>
Modern Slavery <b>Module 1:</b> What is Modern Slavery?	59	59	<b>100%</b>	5	3	<b>60%</b>	<b>97%</b>
Modern Slavery <b>Module 2:</b> Modern Slavery in the Workplace	55	55	<b>100%</b>	4	4	<b>100%</b>	<b>100%</b>
Modern Slavery <b>Module 3:</b> Business Relevance	51	50	<b>98%</b>	-	-	-	<b>98%</b>

Figure 9: Completion of Online Training Modules

## 7.5 Governance and Due Diligence

### Governance

Our approach to governance is anchored in the principles that Modern Slavery risks should be addressed consistently across AMS.

AMS has policies in place that communicate the expectations to both employees and suppliers. These policies outline the standards of ethical behaviours that provides guidance and establishes clear pathways for raising concerns. Staff are encouraged to report grievances or suspected breaches through confidential reporting channels, with protections in place to ensure individuals can speak up without fear of reprisal. This mechanism reinforces accountability, ensures early detections to risk and empowers people to play an active role in upholding AMS commitments.

To support this commitment, AMS has implemented a dedicated Modern Slavery Policy that reinforces our stance against exploitation and guides our actions in identifying, preventing, and addressing Modern Slavery risks across our operations and supply chain.

Policy	Purpose
<b>Modern Slavery</b>	Ensures AMS' compliance with the Modern Slavery Act 2018 (Cth) by promoting ethical sourcing, mitigating slavery risks in its supply chains, and defining responsibilities for employees and suppliers in upholding our anti-slavery commitments.
<b>Code of Conduct</b>	Establishes consistent expectations on team members (including contractors) behaviours towards each other, our customers, and the broader community.
<b>Diversity Equity &amp; Inclusion</b>	Reflects our dedication to celebrating diversity of thought, identity, experience, and background.

<b>Speak up</b>	Encourages and promotes a culture of openness and acceptance in reporting misconduct within AMS and encourages individuals to report any concerns about misconduct without fear of victimization.
<b>Work Health &amp; Safety</b>	Establishes a commitment to maintaining a safe, healthy, and incident-free work environment for all employees, contractors and relevant stakeholders.
<b>Mental Health &amp; Wellbeing</b>	Raises awareness, reduces stigma, and provides resources and support to foster resilience, enhance overall health, and ensure employees can perform their roles effectively while maintaining a healthy work-life balance.
<b>Equal opportunity, bullying, harassment, &amp; discrimination</b>	Aims to uphold principles of fairness, equality, and dignity for all individuals, ensuring that everyone has equal access to opportunities and is treated with respect.
<b>Grievance Resolution</b>	Provides a clear and fair process for employees and stakeholders to raise concerns, complaints, or issues related to their working environment, employment conditions, or organisational practices.
<b>Recruitment &amp; Selection</b>	Establishes a fair, consistent, and transparent framework for attracting, assessing, and engaging qualified candidates to meet the organisation's needs.

## **Due Diligence**

Due diligence is embedded within AMS supplier management practices, starting with onboarding and extending through ongoing monitoring. AMS applies structured risk assessment, prioritising higher risk categories and cross-checking supplier practices against recognised standards. Our process includes conducting independent desktop audits, self-assessments and ensuring remediation actions are followed through where gaps are identified.

## **Global SteerCo Charter**

AMS recognises the importance of the Modern Slavery Act and is committed to ensuring compliance by the business with its provisions. To this end, AMS developed a Modern Slavery charter to ensure clarity of purpose, responsibilities and expectations of Global SteerCo members in supporting the implementation of the AMS Modern Slavery strategy.

Members are expected to attend all scheduled meetings, share Modern Slavery communications and information across AMS, make timely decisions, take action and champion efforts to assess and address Modern Slavery risks in the operations and supply chains of the AMS.

## 8.0 Effectiveness Assessment

At its core, AMS considers that an effective approach to Modern Slavery due diligence is one that enables us to identify actual or potential situations of Modern Slavery in operations and supply chain, remediate these appropriately and take steps to address root causes. It highlights commitment to ongoing, integrated and consistent risk management across the AMS.

Over the last five cycles of the battery supply chain audits, non-compliances across our three Tier 1 battery suppliers have been reduced by nearly half, falling from 28 in FY21 to 15 in FY25. Importantly, this progress was achieved while the audit standards have become more robust year-on-year. This demonstrates that our program is driving sustained improvements and that corrective actions are increasingly embedding stronger standards into supplier operations. While the overall volume of findings has declined, the issues now being identified are more complex and structural, particularly in governance, Tier 2 supply chain mapping, and the consistent application of health and safety controls. This shift signals that our program has matured beyond surface-level compliance and is now exposing the deeper systemic risks that must be addressed.

The effectiveness of our program is also evident in the timeliness and quality of corrective action closure. By 30 June 2025, all findings from the FY25 audits had been remediated, supported by evidence such as updated risk assessments, training logs, and photographic records. Another marker of effectiveness is the way suppliers are now engaging with audits. In FY25, suppliers were more prepared, more familiar with Verisio's audit protocols, and better able to provide documentation and evidence compared to prior years. This indicates that the audit process itself is driving learning and readiness across the supply base. Moreover, the governance role of AMS's Global SteerCo and the integration of training across AMS employees have strengthened our ability to oversee, monitor, and direct program improvements. These governance mechanisms ensure that emerging risks are identified quickly and that corrective actions are not treated as one-off exercises but as part of a broader cultural shift.

Overall, the reduction in findings over time, the disciplined closure of all corrective actions, and the identification of systemic governance gaps demonstrate that the program is both driving improvements and maturing in scope. At the same time, our learnings from FY25 reinforce that effectiveness must be measured not just by audit outputs, but by the degree to which suppliers integrate risk management into their daily practices.

## 9.0 Engaging and Consulting: Global SteerCo

### Global SteerCo

Guided by the Global SteerCo, members of the committee are instrumental in ensuring information flow between various sections of the business and engaging employees and managers across the organisation on our Modern Slavery risk management efforts.

The Global SteerCo oversees the implementation of the Modern Slavery program including:

- a. Strategic direction
- b. Prioritisation

- c. Risk management
- d. Resourcing
- e. Reporting
- f. Program effectiveness

During the first few reporting years, our Modern Slavery Compliance and Risk Committee (Global SteerCo) met on average every other month to support the development and implementation of our Modern Slavery risk management program. Members of the committee were instrumental in ensuring information flow between various sections of the business and engaging employees and managers across the organisation on our Modern Slavery risk management efforts. This has been key to embedding Modern Slavery risk management in our core operating processes and procedures.

The members of the committee represent the following entities: Australian Motoring Services Pty Limited (Australia); Club Assist North America (North America); and AA Battery Service Limited (New Zealand) (**AABS**).

During the reporting period, AMS consulted and actively engaged with these representatives to ensure that significant milestones set are fulfilled as agreed in Global SteerCo meetings.

Some actions for the year are assigned to a Global SteerCo member. As an example, the representative from North America championed the audit of the supplier in North America. A supplier audit in New Zealand was conducted in conjunction with AABS. We will be working with the New Zealand team to close off action plans for next FY. Furthermore, the Global SteerCo serves as an effective forum for shaping lessons learned, exchanging information, and advocating for Global Modern Slavery compliance. It promotes increased understanding of the challenges, risks, actions being undertaken, and broader advocacy of the Modern Slavery agenda to ensure ongoing compliance across the AMS Group. .

As demonstrated in our Tier 1 supplier onboarding process, members of our Global SteerCo played a critical role in reviewing audit findings and in personally conducting onsite assessment of working conditions, operational practices, and environmental safeguards.

Our highly experienced steering committee will ensure that the risks associated with Modern Slavery continue to be assessed and addressed and that the effectiveness of our actions is reviewed at least quarterly. The Modern Slavery Global SteerCo is part of AMS's compliance program. In addition, we regularly update and seek approval from the Audit and Risk Committee as well as our Board.

The Global SteerCo met quarterly this year during the following dates:

- Q1 – 25 September 2024
- Q2 – 28 March 2025
- Q3 – 2 May 2025 (Gap Analysis for AMS)
- Q4 – 27 June 2025

During the year, we also updated the membership of the Global SteerCo due to role changes. The list below are the new members of the SteerCo:



Figure 10: Compliance and Risk Committee (Global SteerCo)

### 10.0 Case Study: Embedding Safer Practice & Culture

Safe working conditions are a fundamental labour right and form part of AMS’s core culture and Modern Slavery risk management framework. On-site audits of Tier 1 battery suppliers identified recurring non-compliances linked to occupational health and safety. While facilities had documented safety procedures, gaps in implementation placed workers at risk of preventable accidents and highlighted weakness in management oversight.

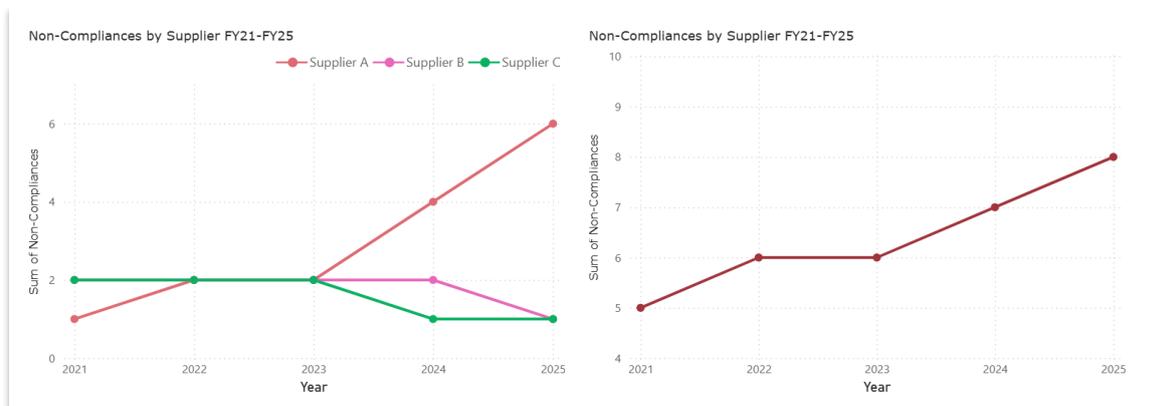


Figure 11: Trend in Occupational Health and Safety Practices

## **Audit Findings**

The overall number of non-compliances has declined, reflecting continuous improvement in many areas of supplier management. However, within the Labour & Employment area, specifically under safety and hygienic conditions, an upward trend was observed. This was largely driven by one supplier, while others reduced or maintained the same number of non-compliances. Issues such as blocked electrical panels, weak chemical storage practices and obstructed fire exits persisted or re-emerged, signalling that while broader risks are being addressed, safety remains an area of concern. These are considered necessities and core compliance obligations making them relatively straightforward to implement and sustain once embedded into routine operations.

## **Corrective Actions and Outcomes**

Addressing the safety and hygienic findings required active collaboration with suppliers to embed safer practices into their operations. Rather than imposing corrective measures unilaterally, AMS worked closely with the supplier to embed both technical fixes and cultural improvements. Fire extinguishers were reinstalled with clear signage to ensure visibility in emergencies. Blocked electrical panels were cleared and added to routine housekeeping inspections, reinforcing preventive discipline. In response to forklift keys left in equipment and PPE inconsistencies, suppliers conducted safety rules training for the entire team ensuring all employees understood proper handling procedures and site expectations. Suppliers submitted photographic evidence, updated inspection logs and changes have been embedded into daily practice. By June 2025 all non-compliances were closed.

## **Learnings for AMS**

One of the key learnings for AMS is that suppliers often default to quick, individual fixes when issues arise, and it takes structured engagement to shift their approach towards systemic, team-wide solutions that build resilience. For example, when the forklift key management risk was identified, the supplier wanted to treat it as an isolated incident. Through engagement, AMS encouraged the supplier to adopt a broader approach, with safety training for the entire operations workforce. AMS recognises that bringing suppliers into the process as partners has strengthened ownership and accountability. Going forward AMS will continue to integrate collaborative approaches into its audit follow-up ensuring preventive actions not only resolve findings but also build long term resilience in supplier management systems.

## **11.0 Our plans: 2026 and Beyond**

AMS recognises that we are a wider group with multiple entities across diverse operating models. This diversity means our Modern Slavery risk profile cannot be assessed through a single lens, but requires a holistic, group-wide approach. FY26 will shift to a consolidated approach to Modern Slavery that reflects a wider scope across the group, ensuring risks are assessed and managed consistently.

### **1. Ethixbase360: Supplier engagement and due diligence**

AMS has contracted with Ethixbase360 for FY26 to use its platform to screen and hold supplier information in reference to Modern Slavery and Sustainability. Through the Ethixbase360 platform, AMS will be able to assess, mitigate and report on third party risks of Modern Slavery in our supply chain. The data generated through this software will support an improvement in the level of detail in reporting on Modern Slavery risks in the next review period. This platform will also provide visibility to all AMS suppliers and its network. Potentially, the desktop-audit from Ethixbase360 may be able to replace on-site audits for our South Korean suppliers.

### **2. Modern Slavery action plan**

As part of the work undertaken with an external consultant and an internal working group in April and May 2025, several key actions have been identified that will be undertaken by AMS during FY26. This includes the development of an AMS Modern Slavery policy which was approved by the Board in May 2025 and the development of a Procurement Policy, incorporating Modern Slavery risk provisions. This complements current policies such as Code of Conduct.

AMS continues to revisit and strengthen existing policies to ensure they remain fit for purpose and responsive to evolving risks. This includes refining current frameworks and developing new policies that more broadly encompass respectful workplace practices.

### **3. Onsite Audit with new supplier and other overseas suppliers**

Building on previous due diligence work, AMS will conduct a comprehensive onsite audit of Supplier D, a new Tier 1 supplier based in the Philippines. This audit will follow our third-party methodology and include worker interviews, document reviews, and operational walkthroughs. Other overseas suppliers, such as Battery Testers, will also need to undergo onsite audits for the first time.

#### **4. Strengthening the Global SteerCo**

The Global Modern Slavery Compliance and Risk Committee (Global SteerCo) will continue to meet quarterly. Its role will expand to include reviewing reports generated through Ethixbase360 and overseeing remediation progress. The Global SteerCo will also monitor regulatory developments to ensure AMS remains compliant with Australian and international reporting requirements. Shared suppliers between AMS and Club Assist North America will be included in the discussion topics during these Global SteerCo meetings. Other entities, in addition to AMS, share best practices in supply chain mapping within their respective countries.

#### **5. Awareness through lived experience**

As part of AMS's awareness and training initiatives, Modern Slavery survivors will be invited to present to the wider team, fostering a deeper understanding of the human impact behind the issue. Sustainable change requires more than compliance processes - it demands an organisational culture that actively recognises and responds to Modern Slavery risks. To strengthen this awareness, AMS will incorporate case studies and expert-led dialogues that go beyond the basics of compliance, offering insights into emerging risks, global supply chain challenges, and effective issue management.

#### **6. LMS across AMS**

AMS will continue to embed Modern Slavery training through our learning platform. The program will cover employees and contractors across all entities and incorporates case studies, regulatory updates and practical scenarios. This training material will be shared to our affiliates and to the supply network, including Tier 2 suppliers.

#### **7. Audits in vulnerable areas of the supply chain**

From FY26 we will extend our audit programs to include indirect vendors such as cleaning providers and contracted service providers. These audits will adopt a risk-based approach focusing on categories with higher exposure to vulnerable groups.

#### **8. Supply Chain Mapping**

Based on the onsite audits conducted, a recurring theme was the lack of established supply chain mapping for key suppliers. As part of the Modern Slavery questionnaires in Ethixbase360, AMS will document the supply chain mapping for these suppliers and assess potential risks of Modern Slavery across the chain.

Annexure

**MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE**

**Principal Governing Body Approval**

This modern slavery statement was approved by the *principal governing body of*

Australian Motoring Services Pty Ltd

as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> ("the Act") on 20 November 2025

**Signature of Responsible Member**

This modern slavery statement is signed by a *responsible member of*

Board of Directors of Australian Motoring Services Pty Ltd

as defined by the Act<sup>2</sup>:

Neil Taylor

Neil Taylor, Chairman

australianmotoring**services**

**Olivia Jones**

General Counsel and Company Secretary

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