



PEDDERS SUSPENSION & BRAKES MODERN SLAVERY POLICY

Under the *Modern Slavery Act 2018* (Cth), “**Modern Slavery**” is defined as conduct which would constitute an offence under the human trafficking, slavery and slavery-like offence provisions under Divisions 270 and 271 of the Criminal Code Act 1995 (Cth), whether the conduct took place inside and outside of Australia.

Modern Slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

1. PEDDERS APPROACH

Pedders is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place in any part of our business operations, nor in any of our supply chains.

Pedders is also committed to ensuring that there is transparency in our own business and in our approach to confronting Modern Slavery throughout our supply chains.

Pedders expects the same high standards from all of our contractors, suppliers and other business partners and stakeholders, to be collectively referred to as our “**Suppliers**” throughout this “**Modern Slavery Policy**”.

2. SUPPLY CHAIN

Pedders is actively working to improve our practices to address the risk of Modern Slavery in our supply chain, including, but not limited to, the following:

- All new Pedders Supplier contracts include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude, or debt bondage, whether adults or children. Further to this, Pedders expects that our Suppliers will hold their own suppliers to the same high standards;
- All Pedders Suppliers are required to sign and adhere to the Pedders Supplier Code of Conduct (a separate document which all Suppliers will receive) that reflects our commitment to protecting human rights, including the prevention of Modern Slavery;
- Pedders is undertaking a Supplier “Evaluation Review” that includes a key document checklist requiring Suppliers to provide evidence of their stance against child/forced labour, human trafficking and/or exploitation of workforce; and
- Pedders is part of the Australian Automotive Aftermarket Association (“**AAAA**”) Modern Slavery Consortium as detailed in Item 4 below.



3. ANNUAL REVIEW AND COMPLIANCE

Pedders is committed to improving our practices to address the risk of Modern Slavery and we will review this Modern Slavery Policy annually to ensure best practice to minimise the risk of Modern Slavery in our supply chain and ensure compliance with Modern Slavery legislation and mandatory reporting requirements.

4. PEDDERS/AAAA MODERN SLAVERY CONSORTIUM

Pedders is working with the AAAA and other founding members of the AAAA Modern Slavery Consortium in developing supplier self-assessment questionnaires and a web-based application to monitor, track and engage with Suppliers.

This will provide functionality to score and rate Supplier responses to identify potential problems or risks based on questions not answered, flagging potential risk areas based on Suppliers' responses, sorting Suppliers' responses into satisfactory/unsatisfactory responses and document completion rates across suppliers by type, location and size.

As this platform is developed to capture a growing number of supplier assessments and improve transparency, Pedders will be able better to identify potential risks for further detailed review and audit. The records of these audit activities, such as validation of Suppliers' responses in self-assessment questionnaires, reviews by Pedders team members and/or third-party audits will be tracked through the platform.

With future development, this platform is intended to provide tools for tracking any remedial and recovery actions as required in the event of identified Modern Slavery abuses.

This is a significant step in Pedders' commitment to transparency and accountability for Modern Slavery risks in our supply chain.