

VELOCITY TRUCK CENTRES

Modern Slavery Statement (2025) - Draft

Velocity Vehicle Group Topco Pty Ltd

ACN: 646 514 141

Registered Office: Velocity Truck Centres Adelaide Pty Ltd, 609 South
Road, Regency Park, South Australia 5010



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A message from the [President/Directors]

Velocity Vehicle Group Topco Pty Ltd ACN 646 514 141 (**VVG TopCo**) and the VTC Group (defined below) is pleased to provide this annual statement under the *Modern Slavery Act 2018* (Cth) (**Act**) in recognition of global concern about Modern Slavery in supply chains.

VVG TopCo is the holding company for the Australian division of global brand Velocity Vehicle Group, which operates under the name Velocity Truck Centres (VTC). In our Australian operations, we have more than 900 employees and 19 dealerships spread across 5 states.

Our experienced workforce includes many staff who have over 20 years of experience and who are a testament to our ongoing commitment and passion for what we do.

VTC is committed to acting ethically and with integrity and transparency in all business dealings.

People are the heart and soul of our business and our aim is to ensure that their fundamental human rights are respected in our own business, as well as by our business partners and suppliers.

VTC is committed to continually improving and developing best practices in identifying, monitoring, managing and reporting on Modern Slavery in our operations and supply chains.

This statement was approved the Board of Directors of each VTC company (defined below) on Date:

Christopher Mahan – Director Signature

Bradley Favre – Director Signature

Richard Higgins – Director Signature



Section 1: Introduction

This Modern Slavery Statement reports on modern slavery risk in the operations and supply chains of VTC and its controlled entities. The statement has been prepared in compliance with the requirements of the *Modern Slavery Act 2018* (Cth) and the principles set out in the associated *Guidance for Reporting Entities* booklet.

The statement covers the following entities:

- Velocity Vehicle Group Topco Pty Ltd (ACN 646 514 141);
- Velocity Vehicle Group Midco Pty Ltd (ACN 646 516 529);
- Velocity Vehicle Group Australia Pty Ltd (ACN 646 522 885);
- Zupps Southside Pty Ltd (ACN 009 839 187);
- Laverton Auto (2016) Pty Ltd (ACN 611 487 211);
- Skipper Trucks Pty Ltd (ACN 112 854 430);
- Geraldine Nominees Pty Ltd (ACN 009 062 015);
- Velocity Truck Centres Adelaide Pty Ltd (ACN 151 699 651);
- Whitehorse Trucks Pty Ltd (ACN 116 437 702);
- Velocity Truck Centres NSW Pty Ltd (ACN 008 014 720);
- Velocity Truck Centres Huntingwood Pty Ltd (ACN 652 363 472);
- VVG Services NSW Pty Ltd (ACN 647 661 194);
- VVG Services QLD Pty Ltd (ACN 647 660 964); and
- VVG Services WA Pty Ltd (ACN 647 661 381),

(collectively, **VTC**).

VTC has served the truck industry in Australia for many years, with its origins beginning in 1971 when it operated under the name Adtrans. We have more than 900 employees and 19 dealerships spread across 5 states, with our teams supported by our corporate head office located in Truganina, Victoria at the Daimler Trucks Laverton location.

We are a division of the global brand Velocity Vehicle Group.

VTC recognises the risk that modern slavery practices can emerge throughout both domestic and international supply chains, and is committed to effectively managing this risk across its operations. Throughout this statement, we use the term “modern slavery” to cover a range of exploitative practices, including several offences under Australian and international law. These include:

- slavery and slave trading;
- domestic or indentured servitude;
- forced labour;
- forced marriage;
- debt bondage;
- human trafficking (including sex trafficking and organ trafficking);
- child labour or slavery;
- use of children in armed conflict; and
- deceptive recruiting to facilitate any of the above practices.

This statement first identifies potential areas of risk for modern slavery in the Group’s operations and supply chains, before describing the policies and other measures we are implementing to mitigate these risks.

Section 2: Operations and Supply Chains

1 Operations

VTC is a worldwide Brand Partner for Daimler AG, the parent for truck brands Mercedes-Benz, Freightliner, Fuso and Mercedes-Benz Vans. VTC has more than 900 employees and 19 dealerships spread across 5 states in Australia. Through these dealerships we retail a range of component parts, vehicles and undertake maintenance and repairs.

2 Supply Chains

Our major supplier is Daimler Truck Australia Pacific which supplies VTC with Mercedes-Benz, Freightliner and Fuso commercial vehicles and various component parts. Mercedes-Benz further supply us with Mercedes-Benz Vans parts and accessories. We also use Alliance branded parts, which are suitable for multiple truck and bus applications. Alliance Truck Parts is an American private brand that provides parts and accessories for heavy-duty

trucks. The company was founded in 1998, as Alliance Brand Parts, and is a division of Daimler Truck North America LLC, a wholly owned subsidiary of Germany's, Daimler Truck AG.

The majority of our suppliers comprise long standing and reputable suppliers who have worked with our dealerships to create supply chain synergies and strong partnerships. VTC also provides leasing, financing and insurance products through Daimler Truck Financial Services.

Section 3: Identifying the Group's Modern Slavery Risks

VTC understands that the risk of causing, contributing to or being directly linked to modern slavery practices exists in every business' operations and supply chains. VTC further recognises that the breadth and depth of these supply chains makes it challenging to effectively manage and mitigate the risks of modern slavery below the first tier of its supply chain and it is for this reason that we have formed a Modern Slavery committee to design and put in place procedures that request transparency from our suppliers in the form of periodic reviews.

At the time of this statement VTC considers its overall risk of exposure to modern slavery to be low based on the following.

- VTC operates in Australia which is classed as a low prevalence, high regulation country for Modern Slavery according to the Global Slavery Index 2018. Our principal suppliers for vehicles and the associated spare parts are reputable and work from locations in low geographic risk regions including America, Germany and Japan. Suppliers such as Daimler Truck Australia Pacific have in place their own Modern Slavery Statements and procedures to identify any potential modern slavery activities in their activities or supply chains.
- Our employment recruitment procedures are governed by the Fair Work Act 2009 (Cth), National Employment Standards (NES), Work Health and Safety Standards (WHS), State and Federal anti-discrimination laws and the Privacy Act 1988. Our employees are engaged under contract using an ethical recruitment practice that prohibits any form of forced labour, child labour, debt bondage or human trafficking.
- Our internal training processes include introduction to the VTC Code of Practice, Whistleblower reporting/policies and VTC's online training platform module on Modern Slavery.
- VTC does engage third-party employment agencies to recruit skilled workers from overseas, including regions identified as having elevated modern slavery risks. We recognise the potential vulnerabilities associated with labour hire arrangements. Prior to engaging these agencies we have conducted enquiries into their operations and alignment with the Australian Modern Slavery Act 2018. This includes conducting due diligence on recruitment practices, requiring transparency around sourcing, and regularly reviewing agency compliance to uphold ethical standards throughout our labour supply chain.

Whilst VTC considers its exposure to Modern Slavery to be low, it concedes that there could be risks associated with suppliers that provide services or products such as staff uniforms, cleaning, elements that go into parts and vehicle production.

Some of the potential risks we consider may be associated with our broader supply chain are:

Raw Materials

There are a range of raw materials that are used in our products including steel, rubber, plastic, mica, agriculture. Some of these materials and services have a heightened risk of Modern Slavery, such as child labour, debt bondage, deceptive recruiting for labour or service, and forced labour.¹

Labour exploitation

VTC recognizes that risks past the first layer of a supply chain may exist, but VTC is not aware of any actual modern slavery practices in our own supply chain. VTC further recognises and is aware that there is a heightened risk of labor exploitation in certain sectors of our broader supply chain which may include for example manufacturing of vehicle parts which commonly comprise steel, iron, aluminum and magnesium.

Lack of visibility

Although not a direct risk, VTC is aware that due to a lack of visibility past the first layer of a supply chain that modern slavery practices can occur in areas with low visibility, particularly in industry sectors which are more vulnerable to modern slavery practices.

Section 4: What are we doing to mitigate modern slavery risk?

Ethical Code of Conduct

To protect employees within our organisation against modern slavery, VTC has an Ethical Code of Conduct - with dedicated sections on Behavioural expectations of VTC and its employees. It discusses VTC's zero tolerance policy to discriminatory behaviour, bullying and sexual harassment in the workplace. VTC seeks to create a work environment that encourages inclusivity and diversity and respect for human rights.

Whistleblower Policy

VTC has a whistleblower policy as mandated by section 1317AI of the Corporations Act 2001 (Cth). This policy outlines the protections that will be afforded to employees, directors and /or suppliers who report serious wrongdoing at VTC in accordance with Part 9.4AAA of the Corporations Act.

The whistleblower policy protects employees and third parties reporting concerns regarding unethical or illegal conduct, including in relation to Modern Slavery.

Employees may elect to report violations to their manager or the Modern Slavery Compliance Officer. If an employee or external whistleblower wishes to remain anonymous they are further able to report via phone or - email to Your Call Whistleblowing Solutions, who VTC has contracted to receive and manage` whistleblower reports with impartiality and confidentiality.

¹ Source: Global Estimates of Modern Slavery Report September 2022 as compiled by International Labour Organization, Walk Free and UN Migration

After receipt of a report, the Modern Slavery Compliance Officer conducts an initial risk-based assessment of the potential violation and then escalates the incident to our Management Board. The Board then conducts a comprehensive investigation of each incident on a case by case basis.

Training

Internal training for both new and existing employees is covered by way of tool box meetings and VTC's online training platform.

Our Stakeholders

VTC has implemented a standing internal working group comprising key stakeholders across relevant departments whose role it is to oversee the development and implementation of VTC's Modern Slavery Code of Conduct. A Modern Slavery Compliance Officer has also been appointed as a first point of contact for all identified risk reports.

VTC has implemented a Modern Slavery Questionnaire that is sent annually to our suppliers requesting information about their business and supply chains in relation to modern slavery.

Results of the survey are collated and reviewed by our Modern Slavery Officer. Should any concerns arise then they are referred to our Management Board who will decide on a case by case basis and depending on the mitigating factors, if the VTC Group will continue to engage the supplier.

Supplier Code of Conduct

A Supplier Code of Conduct accompanies our VTC Supplier Questionnaire and informs suppliers that the VTC Group is committed to acting ethically with integrity and transparency at all times. VTC are committed to continually improving and developing best practices in identifying, monitoring, managing and reporting on Modern Slavery in our operations and supply chains.

Section 5: How do we assess the success of our actions against modern slavery?

The steps we take to identify and address modern slavery are:

1. We provide training to our staff on understanding and identifying Modern Slavery.
2. Pathways are provided for staff and suppliers to report any Modern Slavery concerns they may have been identified.
3. We collaborate with Daimler Truck Australia Pacific to assess supplier risks.
4. We ask our Suppliers annually to confirm their Modern Slavery position via questionnaires and review of their Modern Slavery Statements.

The table below summarises how VTC measures the effectiveness of its modern slavery program. Each section/assessment/review may be adjusted to respond to reported changes in the supply chain and the remedial actions taken by VTC.

Sections	Assessment/Review
1. Policy	<p>The Modern Slavery Review Committee will meet Annually to discuss and review:</p> <ul style="list-style-type: none"> • implementation of internal control systems that report on the effectiveness of actions taken to address modern slavery risks both within the business and our supply chains and • training modules and implementation. • As part of this review, the Modern Slavery Compliance Officer will: • report to the committee ongoing results from the Supplier Questionnaires: • report any reported breaches of policy which have been escalated to the Management Board in the annual Modern Slavery Statement and • record minutes of all meetings.
2. Training	<ul style="list-style-type: none"> • Toolbox meetings and online training modules for new and existing staff cover Modern Slavery, the VTC Ethical Code of Conduct and the VTC Whistleblower Policy. • Each employee is given a review to complete after each training. • Changes or updates identified by the Modern Slavery Review Committee are communicated to the HR Director for updating and implementation into the training modules. • As updates occur employees will be required to undertake further training. This is by way of Toolbox meetings or online learning modules. • All training modules undertaken by employees are recorded on their Training Record.
3. Supplier	<ul style="list-style-type: none"> • Suppliers are issued with a link to the VTC Supplier Questionnaire and asked to complete same. • All results of the Supplier Questionnaire are reviewed and categorised according to low, medium and high risk of modern slavery in their supply chain. • A report of collated Supplier Questionnaire information will be discussed at the annual meeting of the Modern Slavery Review Committee

	<ul style="list-style-type: none"> Suppliers are issued with a VTC Supplier Code of Conduct explaining our policy on Modern Slavery and asking them to align with our values and be willing to drive continuous improvement in their processes and procedures to mitigate modern slavery risk in their organisations and supply chains.
4.Risk assessment and remediation	<ul style="list-style-type: none"> Should a modern slavery risk be flagged or reported, the Modern Slavery Compliance Officer will conduct an initial risk-based assessment of the potential violation and then escalate the incident to the Management Board. The Board will then conduct a comprehensive investigation of each incident on a case by case basis.
5.Transparency	<ul style="list-style-type: none"> VTC make publicly available their Modern Slavery Statement by way of upload to the Australian Border Force Online Register for Modern Slavery. The report will be updated annually and report on: <ul style="list-style-type: none"> any incidences investigated and actioned by VTC, statistics derived from responses to the VTC Supplier Questionnaire, Any legislative or policy change that may have occurred in the previous 12 month reporting period.

Section 6: Process of consultation with controlled entities

VTC recognises the importance of acting in a unified way against modern slavery. This is particularly important given the number of separate dealerships operated by VTC across Australia each with their own distinct operations. The challenges faced by each of the dealerships in addressing modern slavery risks are similar, warranting a coordinated approach.

A diverse and consultative approach was taken with the various national teams across VTC, who have contributed and reviewed the statement prior to submission. The steps highlighted in this statement are implemented, such that all of the dealerships act in a unified and coordinated way.

As an authorised dealer for Daimler Truck and Mercedes-Benz in Australia, we also recognise the need to take a coordinated approach with these and our other partners. VTC is committed to working together to mitigate the risk of modern slavery in our shared operations and supply chains.

Section 7: The Reporting period July 2024-June 2025

During the reporting period the following occurred:

- Velocity Truck Centres had no modern slavery incidents reported to the modern slavery officer.
- VTC Supplier Code of Conduct was emailed to suppliers June 2024 and December 2025
- Supplier Questionnaires were completed via a survey monkey and there were no incidents of modern slavery reported by our suppliers. These were completed in November and December 2025
- In response to our Supplier Questionnaire, our suppliers reported that to the best of their knowledge, their own suppliers had no reported incidents of modern slavery in their businesses.
- An annual meeting of the Modern Slavery Committee was convened and the Modern Slavery Officer tabled the results of the Modern Slavery Supplier Questionnaire survey and advised that there were no reported incidences of Modern Slavery within the business of Velocity Trucks Centres for the reporting period.