

Acknowledgement of Country

Smartgroup acknowledges the Custodians of Country throughout Australia. We pay our respects to Aboriginal and Torres Strait Islander cultures and to Elders past and present and thank them for their ongoing custodianship of this land and community.



kengatha-nak-thangi Grow Mother Country

By Jade Kennedy of the Tatti-Tatti/ WadiWadi/ Muddi-Muddi – West Kulin Nation and Wajak/ Kaardjin – Noongar Nation. Sustainability Report 2024

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1 —— Our Sustainability Strategy: A Smarter, More Sustainable Tomorrow



How we are adapting as a business to better meet our responsibilities on climate, to communities, to stakeholders and with our supply chain.

Read more - pg.16



The steps we are taking to design and deliver products and services that enable net zero and allow us to digitalise our customer experience.

Read more - pg.30



The support we are looking to provide our clients and customers to facilitate financial wellbeing and to promote sustainable and smart driving behaviours.

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Our People Make This Possible

Creating a thriving work environment through our diverse and inclusive culture, strengthening our Aboriginal and Torres Strait Islander connections, developing and engaging our team members, and ensuring healthy and safe workplaces.

Read more - pg.41

Welcome

Welcome to our 2024 Sustainability Report



At Smartgroup, sustainability is not simply a goal but a fundamental principle that drives every aspect of our organisation.

Since we adopted our Smarter, More Sustainable Tomorrow Sustainability Strategy in 2022, we have worked hard to ensure that we continue to deliver positive sustainable outcomes across our business for our employer clients, our customers, our investors and our people.

We are proud to share the progress we have made throughout our second full year of implementation of our strategy.

Providing financial flexibility for Australians

The rising costs of living have wide-ranging implications for Australians. At Smartgroup, we are uniquely positioned to help alleviate these pressures through our salary packaging and novated leasing services. This year, we helped more than 445,000 customers increase their take-home pay and 10,855 customers lease a new electric or hybrid vehicle, enabling households to both maximise their income and reduce their impact on the environment.

To make it easier for our clients and their employees to unlock these benefits and be part of the transition to a low-emissions future, we began a new partnership with digital energy management company, Intellihub, helping deliver affordable subscription access to solar battery and electric vehicle solutions to our customers. We also continued to enhance our digital offerings focused on improving the accessibility of our products to customers. including through the launch of our new smart.com.au website. our enhanced novated leasing hub and the release of multi-language chat, offering our customers chat services in 100 languages. We will continue exploring new smart solutions to support Australians as part of our digital transformation journey.

Sustainability Governance

Expanding our social impact

In 2024, we invested nearly \$250,000 in local communities by donating to 21 charitable initiatives spanning financial education, support for marginalised communities and climate change solutions. We adopted our first Human Rights and Modern Slavery Roadmap and released our third Modern Slavery Statement, reinforcing our unwavering commitment to preventing modern slavery and safeguarding human rights in our business and supply chain. We also achieved a number of key targets across our Human Rights and Modern Slavery agenda, including refreshed and enhanced scanning for modern slavery and environmental, social and governance (ESG) risks across our supply chain.

Welcome

2024 Highlights

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Welcome



We strive to make EVs an attractive and affordable option for our clients and customers. In addition to making the transition simple and cost effective, we are also providing solutions to enhance the full EV ecosystem, including access to green energy and charging technology.

We continue to support our customers with internal combustion engine (ICE) vehicles, which make up a significant portion of cars leased, to make informed choices to sustainably manage and use their vehicles. We also support all our novated lease and fleet vehicle drivers with our Carbon Offset Program, which we have been running since 2008, helping our customers to invest in restoration projects and offsetting more than 887,000 tonnes of carbon emissions generated by their vehicles. In 2024, we again distributed over \$1.5 million from the program into important projects across Australia.

Empowering our people to drive change

We are proud of our diverse and inclusive culture. Despite internal changes this past year, including the roll-out of a new operating model and growing the team, we have maintained our 40/40/20 gender diversity targets across the organisation. We also introduced a Diversity Council and enhanced our approach to Employee Network Groups, with new groups established to align with our Diversity Pillars of Gender, Pride, Accessibility and First Nations.

Advancing our reporting approach

We have continued to mature our approach towards sustainability reporting, achieving year-on-year progress in line with best practices. This is our second report in accordance with the Global Reporting Initiative (GRI) Standards.

We continue to grow our understanding of our climate risks and to work towards alignment with the new mandatory climate reporting requirements outlined in the Australian Sustainability Reporting Standards (ASRS), developed by the Australian Accounting Standards Board (AASB). Our goal now is to align all our reporting with AASB climate disclosure requirements (AASB S2) by 2026. We are confident this clear, transparent approach will enable more people to engage with our commitments, actions and outcomes in the years ahead.

You can also find the full results of our progress on climate disclosures on page 32 in our Annual Report.

Looking forward

As Australia continues its energy transition journey and tackles rising living costs, we will be working even more closely with the organisations who provide critical services to our communities and helping them to support their employees. We will also be strengthening our efforts in supporting our customers to transition to a more sustainable lifestyle, and tackling cost of living pressures through targeted products and partnerships.

While we are proud of the progress we have made, the transition towards *A Smarter, More-Sustainable Tomorrow* is ongoing, and we recognise there is more we can do. Next year, we will begin re-assessing and evolving our sustainability strategy. This will be an exciting opportunity to set the stage for the next part of our journey.



2024 Highlights

Progress across our sustainability strategy

Smart Business

- Scope 1 emissions decreased by 15% while Scope 2 emissions fell by 43%.
- Our Scope 3 emissions profile increased in 2024 as a direct result of business growth.
- Completed a qualitative climate scenario analysis risk assessment.
- Applied our Social Impact Framework to improve the direction and outcome of our sponsorship and community activities.
- Donated nearly \$250,000 in grants through the Smartgroup Foundation.
- Established sponsorships with Clontarf Foundation and Athletics South Australia.
- Completed modern slavery risk assessments for Tier 1 and Tier 2 suppliers.
- Developed and endorsed a Human Rights and Modern Slavery Roadmap.

Smart Solutions

- Extended our carbon offset program with over \$1.5 million in funds donated to reforestation projects across Australia in 2024.
- 44% of our new novated lease vehicle orders for 2024 were EVs.
- Entered into a partnership with Intellihub to provide more energysaving solutions to customers.
- Supported our novated lease customers to make sustainable decisions with environmental and safety ratings on vehicle quotes and with sustainable driving information.
- Launched a single brand "Smart" with improved accessibility functionality and new digital platforms to lift service levels for customers.

Website traffic increase

[^]31%

Smartleasing - 125% Smartsalary

Smart Customers

- Enhanced Smartrewards by offering even more savings from Australian brands.
- Launched an exciting frequentflyer agreement with Qantas providing frequent-flyer rewards offerings to our customers.
- Established a new agreement with the Commonwealth Bank providing more investment options to customers.
- Offered new charging solutions for fleet clients via our partnership with NHP.

Cost of living

445,000+

customers across Australia use our services to reduce their taxes and maximise their take-home pay.

Our People Make This Possible

- Recognised as an Employer of Choice for Gender Equality citation again for 2023-2025.
- 40/40/20 gender targets maintained at all levels of the business.
- Established Smart Diversity
 Council standing up new
 Employee Network Groups
 aligned with our Diversity Pillars.
- Established an Accessibility Employee Network Group, taking up silver membership with the Australian Disability Network (ADN) and participating in the ADN's Accessibility and Inclusion Index.
- Innovate Reconciliation Action Plan (RAP) in implementation phase with key achievements in 2024 including the adoption of our First Nations Employment Program.
- Launched Respect@Work and a Work Health and Safety Action Plan.

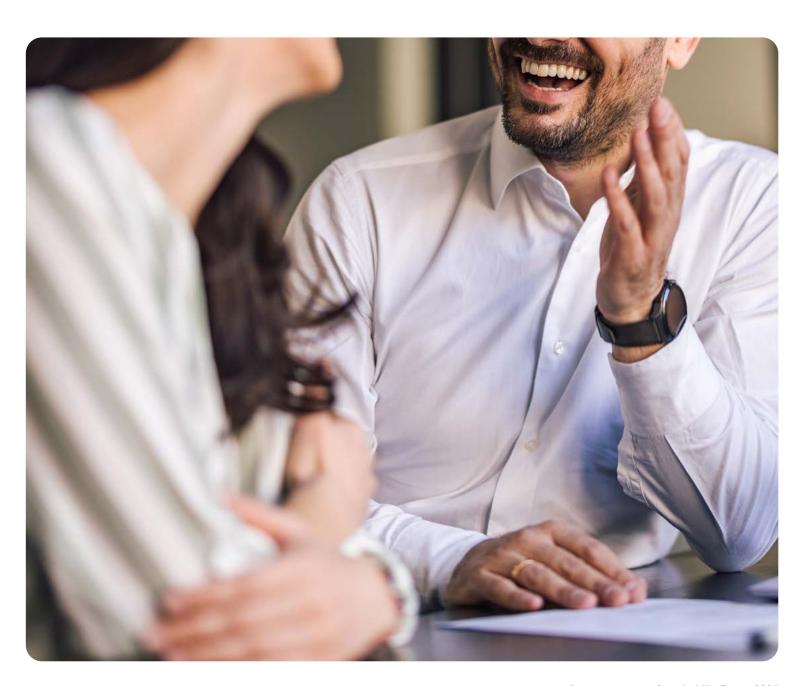


About this report

This report details our sustainability performance as Smartgroup Corporation Ltd (Smartgroup) for the year 1 January to 31 December 2024. The report covers all our activities and is compiled in accordance with the Global Reporting Initiative (GRI) Standards for this period.

We are an ASX-listed public company with operations across Australia, and our head office is located at Level 8, 133 Castlereagh Street, Sydney, NSW, 2000.

Our sustainability reporting is annual and aligned with our financial reporting period. There have been no restatements of information during this reporting period. Our reported greenhouse gas emissions have been prepared by a third-party impact consultancy, however, our sustainability reporting has not been externally audited. Our Annual Report, including the Remuneration Report, is externally audited by KPMG.



About us

Welcome

About us

Smartgroup offers salary packaging, novated leasing and fleet-management solutions to employer clients across numerous industries in Australia, including government, healthcare, not-for-profit, education and corporate.

Central to everything we do is our commitment to delivering an exceptional experience to our employer clients and their employees – from the calls we take to the industry-leading technology we develop. We are consistently working to improve our offering full circle including the way we design our processes and the services we provide, while considering our environmental and social impacts.

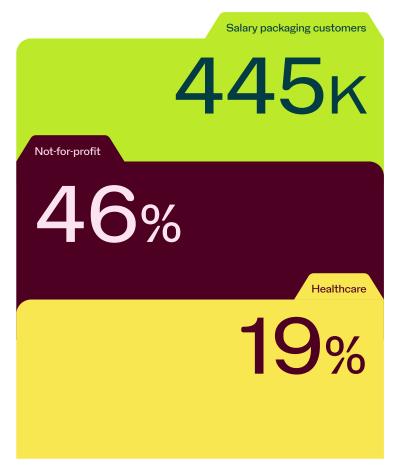
Our supply chain includes software providers, financiers, vehicle dealerships and manufacturers, insurance companies, other financial-service providers, our office premises and the services to support those premises.

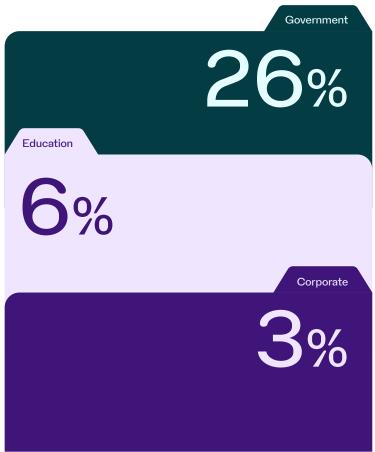


You can find out more about Smartgroup in our Annual Report <u>here</u>.

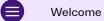
Employer sectors we operate in

Our clients and their employees





Sustainability Governance



About us

How we deliver to our customers

The sectors we work in	Key areas	Benefits	Outcomes
Not-for-profit Healthcare	Salary packaging	Alleviate cost-of-living pressures: Employees can pay for certain expenses from their pre-tax income, such as rent and mortgage costs, superannuation contributions and work-related equipment, effectively lowering their taxable income and increasing their take home-pay. Attraction and retention: Employers can enhance their remuneration packages, making them more attractive to potential employees and helping retain existing staff.	Comprehensive salary packaging programs tailored to clients' needs. Administrative support that reduces the burden on internal HR teams, allowing them to focus on core activities.
Government Education	Novated leasing	Cost savings on vehicle purchases: Employees benefit from savings related to the purchase and running costs of a vehicle through pre-tax payments. Affordable access to vehicles: A novated lease helps customers purchase the vehicle they need in a tax and budget effective way. Customers can pay for an EV from their pre-tax income, fully exempt from FBT.	Access to competitive vehicle pricing, complete vehicle-management services and an extensive repairer network. Faster uptake of EVs across the country reducing transport-linked emissions.
Small businesses Corporate	Fleet management	Enhanced fleet efficiency: Customisable fleet-management solutions that save time and money for businesses, while improving driver safety. Operational flexibility: Businesses can adapt fleet services to meet specific operational needs, enhancing overall productivity.	Fleet-management services that provide real-time tracking, maintenance scheduling, and cost analysis. Consulting services to optimise fleet use and reduce operational costs.



Welcome

Our award-winning services

Our commitment to service excellence, employee engagement and sustainability has been recognised with numerous awards and citations.

Dow Jones

Member of
Dow Jones
Sustainability Indices
Powered by the S&P Global CSA

Included for the second year in the Dow Jones Sustainability Indices

Sustainability Strategy

Sustainalytics Rating



ESG Risk rating by Sustainalytics of 11.5, ranked in the 95th percentile globally

S&P Global ESG score

S&P Global

Ranked in the 93rd percentile worldwide

(up from 87th percentile in 2023 and 81st percentile in 2022)

Inclusive Employer



'Inclusive Employer' recognition

with the Diversity Council Australia – a citation held since 2019

Employer of Choice



Employer of Choice for Gender Equality by the Workplace Gender Equality Agency (WGEA) 2023-2025

(a citation held since 2021)

ISS ESG responsible investment



Included for the first year as a responsible investment through ISS, receiving a "Prime" ESG rating

Industry associations

Industry engagement

We are proud to be members of the following industry associations:











Sustainability Strategy

Our Sustainability Strategy: A Smarter, More Sustainable Tomorrow

Our vision is to participate in the transition to a low-carbon future, supporting our clients and their employees to maximise their benefits through our offerings, and amplifying the positive impacts we have on the environment and the communities in which we operate.

Our sustainability strategy outlines the important role we envisage playing to create *A Smarter, More Sustainable Tomorrow.*





Sustainability Strategy

Our approach to sustainability

In 2022, we conducted a materiality assessment to identify key ESG priorities to inform our strategy. This included a peer and context review of industry trends, a stakeholder survey with 174 participants (covering clients, suppliers, industry bodies and employees) and workshops to refine our material topics.

Full details of our findings can be found in our 2024 Sustainability Report data book.

In the coming year, we plan to review and evolve our sustainability strategy in light of internal business changes, new partnerships, and the changing national and global context.

Our current material topics are:

- Energy and emissions
- Transparency, accountability and reporting
- Ethics and integrity
- Enabling client and customer sustainability
- Innovation and technology
- Client and customer education
- Community investment
- Human rights and modern slavery

- Sustainable and ethical procurement
- Diversity, equity and inclusion
- Employee engagement and development
- Employee health, safety and wellbeing
- **Engagement with Aboriginal and Torres** Strait Islander peoples



Sustainability Governance

Sustainability governance

Strong governance underpins progress on our sustainability ambitions.

Our Board is supported by four Board-level committees, with the ESG Committee responsible for overseeing our sustainability strategy by:

- · Reviewing our sustainability priorities;
- Integrating these priorities into our operating framework and long-term values; and
- Assessing progress against our commitments.

All executives have relevant KPIs that are directly aligned to achieving our sustainability targets, with responsibilities delegated across business functions, including finance, people and culture, operations, and marketing.

The ESG Committee meets at least three times a year and comprises five non-executive directors: the Chair, Ian Watt AC; and committee members John Prendiville, Carolyn Colley (until 31 December 2024), Anne McDonald and Mark Rigotti.

In 2024, the ESG Committee continued to mature our reporting approach, approved the publication of our third Modern Slavery Statement, reviewed the Social Impact Framework and provided oversight of the continued EV strategy rollout. They also approved the adoption of our first Environmental Management Policy and Human Rights and Modern Slavery Roadmap, and monitored the Reconciliation Action Plan working group and the Smartgroup Foundation's work.

Smartgroup Sustainability Governance Model

The Board

ESG Committee

Responsible for overseeing the Sustainability Strategy and Climate Disclosure Roadmap.

Human Resources and Remuneration Committee

IT and Innovation Committee

Audit and Risk Committee

Contribute to managing Smartgroup's economic, environmental and people impacts.

Executive Leadership Team

Working closely with the Chief Executive, the Group Executive for Legal, Risk and Corporate Affairs and Group Executive for People and Culture have direct responsibility for Smartgroup's sustainability performance.

However, the whole Executive Leadership Team (ELT) is responsible for managing risks associated with climate change. All executives have relevant KPIs that are directly aligned to meeting targets in the sustainability strategy.

Sustainability Governance

Sustainability framework

Internal

Our approach is guided by:

Our priorities:

Approach →

- Smarter experiences
- · Smarter products
- Working smarter
- Stakeholder engagement and materiality assessment

Policies and standards, including:

- · Code of Conduct
- · Diversity Policy
- · Ethics Policy
- · Environmental Management Policy
- · Human Rights Policy
- · Speak Up Policy

Employee-focused policies, including:

- · Domestic and Family Violence Policy
- · Education Assistance Policy
- · Flexible Work Policy
- · Learning and Development Policy
- · Parental Leave Policy
- · Recruitment and Selection Policy
- Workplace Behaviours and Equal Opportunity Policy

Risk management →

Our risk is managed by:

Our risk-related policies and standards, including:

- Risk Appetite Statements
- Risk Management Policy
- Enterprise Risk Management Framework
- · Group Procurement Policy
- · Gifts, Entertainment & Political Donations Policy
- · Anti-bribery & Corruption Policy
- Privacy Policy
- Climate change risk assessments (including lowemissions and high-emissions scenario analysis)

Work Health & Safety (WH&S) Policy and associated policies, including:

- Mental Health and Wellbeing Policy
- Respect@Work Policy
- Safe Driving Policy
- Employee Assistance Program (EAP)
- · Grievance Procedure
- · Return to Work Policy

Standard ASX policies, including:

- · Disclosure and Communication Policy
- · Disclosure and Materiality Guidelines
- External Audit Policy
- Trading Policy

Action →

We drive action through:

Our strategies, targets and action plans:

- · Sustainability Strategy
- Social Impact Framework
- Gender Equality Strategy (2023-2025)
- 40:40:20 Gender Diversity Target
- Reconciliation Action Plan (RAP) Innovate level
- Accessibility Action Plan (2024)
- First Nations Employment Program

Employee-focused initiatives, including:

- · Diversity Council
- Employee Network Groups aligned with each area of our Diversity Pillars
- Wellbeing Fund
- Smartgroup Foundation
- Paid volunteering (Make a Difference) days
- · Employee Social Club



Sustainability Governance

Sustainability framework

2024 Highlights

External

Approach →

Our approach is guided by:

Regulatory standards and frameworks, including:

- ASX Corporate Governance Principles and Recommendations (especially 7.4)
- · Global Reporting Initiative (GRI)

Regulatory or industry bodies, including:

- Australian Securities and Investments Commission (ASIC)
- Australian Finance Industry Association (AFIA)
- · Australian Fleet Management Association (AFMA)
- · National Automotive Leasing & Salary Packaging Association (NALSPA)

Risk management →

Our risk is managed by:

Legislative obligations, including:

- · Australian Sustainability Reporting Standards (ASRS, formerly TCFD)
- · Modern Slavery Act 2018
- Privacy Act
- WorkCover

Emerging requirements, including:

· Task Force on Nature-related Financial Disclosures (TNFD)

Action →

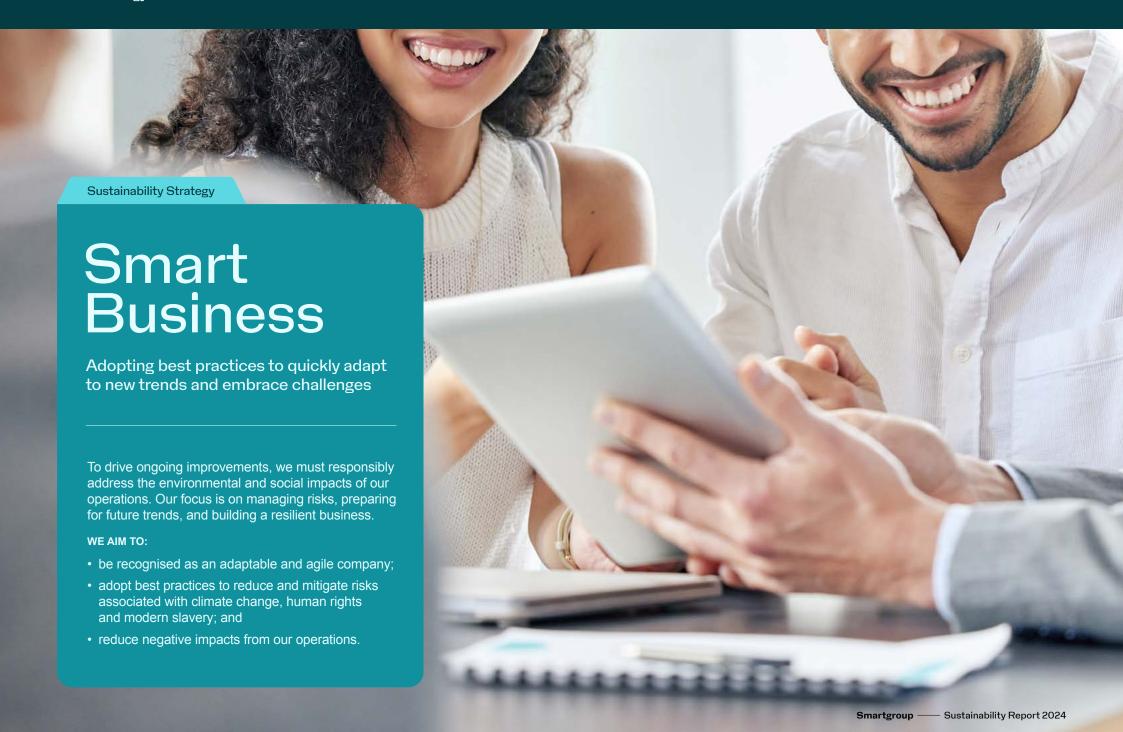
We drive action through:

Partnerships and programs, including:

- · Carbon Positive Australia
- Intellihub
- Chargefox
- Diversity Council of Australia (DCA)
- · Electric Vehicle Council
- Greenfleet
- The Nature Conservancy
- University of Technology Sydney
- Clontarf Foundation
- Athletics SA
- The Smartgroup Foundation

Performance is measured and reported annually through our annual sustainability reports.







Our strategy in action

Taking action on climate

We are committed to participating in the transition to a low-carbon future. In addition to addressing our own emissions, we strive to support our clients and their employees in understanding and reducing their carbon footprint.

Our approach

Energy and emissions

Our operations consume energy and contribute to greenhouse gas (GHG) emissions, primarily through Scope 3 emissions related to our supply chain, which represent 84.9% of our total emissions.

In 2022, we completed a full analysis for our Scope 1, 2 and 3 emissions, which established a baseline for measuring progress, identifying key focus areas and setting reduction targets. To address our operational emissions, we aim to increase the use of renewable energy and offset unavoidable emissions, beginning with those within our direct control.

Our commitments	2024 Progress
All the sites we control will source 100% renewable energy by 2026.	 At the end of 2024, renewable energy accounted for 79% of total electricity used by all offices.
Our direct operations will be net zero by 2030.	 In 2024, we made measurable progress in reducing our direct operational emissions. Our Scope 1 emissions decreased 15% while Scope 2 emissions fell 43%. Our business experienced significant growth in 2024, which impacted our Scope 3 emissions profile.
We will implement annual reporting of Scope 3 emissions by 2026.	 In 2022, we completed the first Scope 3 assessment to establish our emissions baseline. In 2024, we continued to improve our data- collection process to improve the accuracy of our Scope 3 emissions and the quality of our reporting
We will achieve a demonstrated reduction in Scope 3 emissions intensity by 2026.	 We are preparing an employee commuting and business-travel plan to help reduce our Scope 3 emissions. We are working with our supply chain to partner with suppliers who meet our sustainability goals and in turn help reduce our Scope 3 impact.
Completed / Target Met	Not Started / Off Track

2024 Progress

79%

of the electricity used by all our offices in 2024 was renewable.



Our performance

Emissions reduction and renewable energy transition

In 2024, we made measurable progress in reducing our direct operational emissions. Our Scope 1 emissions decreased by 15% from 114.99 tCO₂e to 97.62 tCO₂e, while Scope 2 emissions from purchased electricity fell by 43% to 50.91 tCO₂e. driven by our strategic shift toward renewable-electricity procurement.

Our business experienced significant growth in 2024, which impacted our Scope 3 emissions profile. The expansion of our business operations led to increased emissions in several areas: our procurement spending rose by 21%, business travel intensified with doubled flight distances. While these growth-related emissions increases reflect our business success, we are implementing targeted strategies to decouple our growth from environmental impact, including addressing employee and business travel, and optimising office technology and equipment.

Because our energy agreements expire at different times, we have phased our transition to renewable energy. In 2023, three of our five main offices switched to renewable energy with Sydney, Melbourne and Adelaide offices on fully renewable energy for the full year of 2024. We are engaging with the landlords of the remaining two offices to encourage them to offer renewable energy options. At the end of 2024, renewable energy accounted for 79% of the total electricity used by all offices.

You can read more about how we are mapping our supply chain to identify reduction opportunities on page 25.

A more sustainable fleet

While our overall novated leasing vehicles under management grew by 22% in 2024, we simultaneously accelerated our transition to electric vehicles, achieving a 36% increase in EV settlements. We also supported all our novated and fleet drivers with access to our Carbon Offset Program and education about sustainable vehicle choices and car usage. This demonstrates our commitment to sustainable mobility solutions even as we scale up our operations. You can read more about this on page 31.

Addressing employee and business travel

Employee commuting and business travel are significant sources of emissions. We have embedded flexible working practices and continued investing in technology to enhance collaboration and encourage employees to minimise unnecessary travel.

Additionally, we continued to offset emissions from all flights through our partnership with Greenfleet. In 2024, the funds from offsetting these flights supported the Wooden Hut project in Waka Waka and Barunggam Country in Queensland, aimed at revegetating more than 80 hectares of cleared land. We also entered an agreement with Qantas as a preferred travel partner, benefiting from their investments in projects outside the aviation sector through the purchase of carbon credits.

Optimising office technology and equipment

Since 2023, we have replaced 480 laptops under the Lenovo CO₂ Offset Service. By the end of 2026, we plan to replace all remaining laptops. We have also migrated part of our cloud services to Microsoft, which has an established Carbon Offset Program and a commitment to be carbon negative by 2030, with reporting aligned to GRI Standards.

We have reduced the number of printers in our offices from 19 to 9 under a new agreement with Canon, which has lowered our printing volume. We have removed all single-use plastic serving ware from our offices, including those used in our kitchens and catering. These have been replaced with paper plates and reusable crockery and cutlery.



Our Sydney office has also improved how it processes and reports on e-waste. ensuring it complies with best practices. Since July 2023, we have collected and recycled 1,540kg of e-waste across multiple states, achieving a 95% recycling rate, which equates to a CO₂ reduction of 6.6 MT.

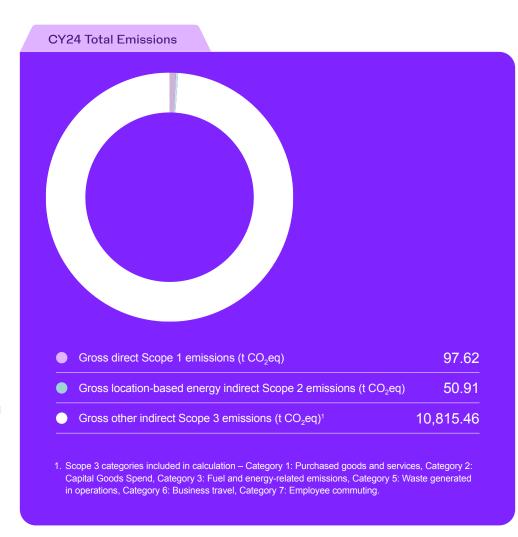
Our Melbourne office building has now achieved a 5.5 star NABERS energy rating (without green power). This has improved from the previous 5 stars NABERS Energy Rating for the building for the period 20 September 2020 to 19 September 2021.

Enhancing our reporting approach

We have made progress to further understand our climate risks and are working towards alignment with the new mandatory climate reporting requirements outlined in the Australian Sustainability Reporting Standards (ASRS), developed by the Australian Accounting Standards Board (AASB).

This year, we have continued to deliver against our disclosure roadmap and completed a qualitative scenario analysis risk assessment, which included an analysis of our climate-related risks and opportunities for two distinct climate scenarios (high and low emissions) over the short, medium and long term.

Our team is working towards aligning all our reporting with AASB climate disclosure requirements (AASB S2) by 2026. You can read more about our climate disclosures on page 32 in our Annual Report.



2024 Progress

reduction in Scope 2 emissions and a 15% reduction in Scope 1 emissions.

of our new novated lease vehicle orders for 2024 were EVs.

e-waste recycling rate in our Sydney office - equates to a CO2 reduction of 6.6 MT, through improved processing and reporting on e-waste.

Our strategy in action

Investing in our community

It is important for us to contribute to the communities in which we operate and live. We aim to positively impact communities across Australia through our charitable giving and to ensure our investments are aligned with community needs.

0	Our commitments	2024	Progress
	We will establish a Social Impact Framework by the end of 2023.	•	The Social Impact Framework was used to improve the direction and outcome of our sponsorship and community activities, including our volunteering and grants through the Smartgroup Foundation.
	We will provide up to \$250,000 community investment annually.	•	We donated nearly \$250,000 in grants through the Smartgroup Foundation. We also established sponsorships with Clontarf Foundation and Athletics SA, supporting young people through education and sport.
r f	The Smartgroup Foundation will seek to make 20 donations or grants annually, focusing on broad geographic impact across the Australian states and territories in which we operate.	•	21 donations were made in 2024 with representation across major states and territories of Australia.
	Completed / Target Met In Progress	• No	ot Started / Off Track

Our approach

Giving back to the community

Smartgroup actively supports community and charity organisations through sponsorships, grants, and the Smartgroup Foundation, committing up to \$250,000 annually for initiatives across every state and territory in which we operate.

Established in 2019, the Smartgroup Foundation provides grants to charities with Deductible Gift Recipient (DGR) status. Each year, selected charities receive grants from \$5,000 to \$15,000 for grassroots initiatives that positively impact communities and align with the Foundation's focus areas.

The Grant Application Committee, consisting of Smartgroup team members, assesses applications based on specific criteria and follow a structured approval process.

Driving change through the Social Impact Framework

In 2023, we adopted a Social Impact Framework to maximise the positive impact of our activities. The framework identifies three priority areas enabling us to track and quantify our impact.

Taking action

on climate

Investing in

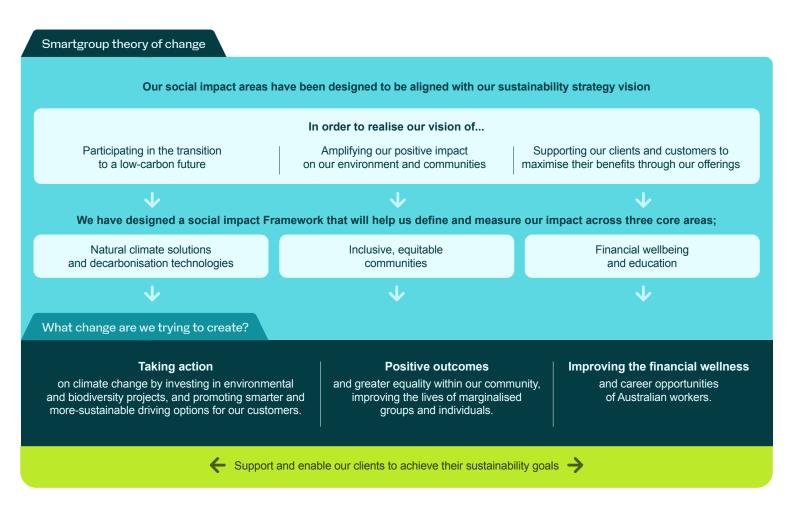
our community

Smart Business

Social Impact Framework

In 2024, we focused on updating our community investment initiatives to drive change in key areas that align with our sustainability vision:

- Climate change action;
- · Improving the lives of marginalised groups and individuals: and
- Improving the financial wellness and career opportunities of Australian workers.



Remaining accountable

and transparent



Smart Business

Our strategy in action

Our performance

In 2024, the Smartgroup Foundation donated nearly \$250,000 across 21 grants to various charity projects, including funding for a koala sanctuary in the Whitsundays, climate education in the Bellingen Shire, dental-health education for young refugee women in South Australia, and the SAAFE program in Western Australia supporting family and domestic violence survivors and those at risk.

Many Smartgroup clients are not-for-profits and public benevolent institutions. To support them, we provided more than \$1,100,000 in funding throughout 2024 for programs including:

- · Scholarship programs;
- · Employee recognition programs;
- · Awards sponsorships; and
- Employee expos and events

This funding included scholarships for employees for our client partners to support their career development and to help attract and retain talent.

We offer two paid Make a Difference days to staff each year. In 2024, our continued partnership with Greenfleet saw about 1,100 native trees planted on Dharawal Country in New South Wales and another 200 on Ngarrindjeri Country in South Australia. The banksia species planted in South Australia will provide potential habitat for the region's pygmy possums. We also invited some of our clients to participate alongside us to support their sustainability goals.



Our strategy in action

Case study

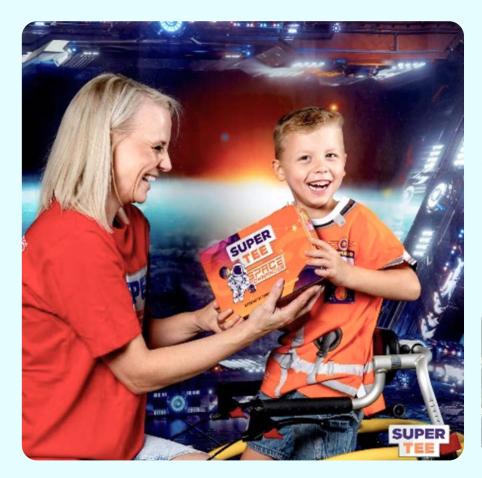
Supporting sick kids and their families with Supertee

In 2024, the Smartgroup Foundation supported Supertee, a charity that produces specially designed cotton shirts that children having treatment can wear instead of traditional hospital gowns.

Since launching in 2018, the charity has delivered more than 39,000 Supertees to children in need across 92 hospitals, with the help of 150 volunteers.

In addition to providing financial support, Smartgroup organised a volunteer day in June 2024 when employees packed 240 care kits for children in hospitals across Queensland, New South Wales and Western Australia

Jason Sotiris, the Founder and Chief Executive of Supertee, said "We are incredibly grateful to the dedicated team of volunteers who thoughtfully packed each care pack with a handwritten message. Your support makes a meaningful difference, and we deeply appreciate it."



We are incredibly grateful to the dedicated team of volunteers who thoughtfully packed each care pack with a handwritten message. Your support makes a meaningful difference, and we deeply appreciate it.



Case study

Greenfleet and Smartgroup partnership - celebrating 16 years

Building a Greener Future Together

In 2008, Smartgroup formed a partnership with Greenfleet as part of its commitment to supporting practical climate solutions and making a meaningful contribution to reducing carbon emissions. Recognising the urgent need for action on climate change and the importance of restoring Australia's native ecosystems, Smartgroup saw Greenfleet's biodiverse reforestation projects as an ideal way to help offset the environmental impact of its operations and customer activities.

Impact So Far

Through our Carbon Offset Program, Smartgroup, on behalf of our customers and their novated leases, has contributed over \$13.6 million, resulting in 887,247 tonnes of carbon being offset over the lifetime of Greenfleet's biodiverse forests. Every contribution made through our novated leasing options directly supports projects like Anam Talamh on Bundjalung Country. This project is particularly significant as it restores a critically endangered lowland rainforest ecosystem, bringing back biodiversity and helping protect native wildlife species, many of which are threatened or endangered. The restoration work at Anam Talamh also strengthens the resilience of local ecosystems against climate impacts.

Looking Ahead

Smartgroup and Greenfleet remain committed to expanding our environmental stewardship with the active involvement of our customers. Moving forward, future initiatives will prioritise key areas such as:

- Supporting more First Nations-led restoration projects that integrate traditional ecological knowledge.
- Expanding biodiversity corridors to protect and enhance wildlife habitats.
- Collaborating on innovative approaches like cultural burns and planting culturally significant species.
- Increasing customer engagement in sustainability efforts through new participation programs.





Anam Talamh project site



A Shared Commitment to Sustainability

Together, Smartgroup, Greenfleet, and our customers will continue to strengthen our shared mission to restore nature, combat climate change, and build a greener future. This partnership is a testament to the power of collective action, empowering every customer to make a tangible difference in addressing climate challenges.

Every novated lease through Smartgroup is an opportunity to contribute to a healthier planet and a more sustainable future.

Aligning our supply chain

By proactively engaging with our supply chain, we can drive positive change beyond our direct operations. We are committed to ethical business practices and collaborating with suppliers who share our values. Our stringent processes ensure that our suppliers meet the ethical, governance, and sustainability standards expected by our clients.

OUR COMMITMENTS	2024 PROGRESS
We will complete a detailed modern slavery risk assessment on all our Tier 1 and Tier 2 suppliers by the end of 2024.	 All risk assessments have been completed for Tier 1 and Tier 2 suppliers.
We will develop a Human Rights and Modern Slavery Roadmap to drive continuous improvement in understanding and responding to human rights risks in our supply chain by the end of 2024.	 The roadmap has been completed and endorsed by the Board in September 2024.
We will include ESG credentials within the procurement due diligence process for all new Tier 1 suppliers by the end of 2024.	 These credentials are now in place for all new Tier 1 suppliers.
We intend that 20% of our suppliers (by number) will be diverse suppliers such as B Corps, female-owned companies, Aboriginal and Torres Strait Islander businesses, SMEs, and not-for-profit enterprises by the end of 2026.	 We continue to actively champion the use of Aboriginal and Torres Strait Islander suppliers through our membership of Supply Nation. We intend to further diversify and expand these efforts in 2025.
Completed / Target Met In Progress	Not Started / Off Track

Our approach

Human rights and modern slavery

We have a zero-tolerance approach to modern slavery and continuously improve practices to mitigate human rights risks in our operations and supply chain.

Our Human Rights Policy outlines our commitments and responsibilities for upholding human rights. The Group Legal and Group Procurement Teams manage our response to modern slavery, with the support of the Executive Leadership Team and the Board. Our Group Procurement Policy requires the review of all supplier contracts to ensure compliance with the Modern Slavery Act. Our annual Modern Slavery Statement tracks our progress on goals and initiatives to reduce modern slavery risks across our business.



Sustainable and ethical procurement

We recognise there are potential social and environmental impacts in our supply chain, particularly regarding Greenhouse Gas (GHG) emissions and human rights risks.

Our Group Procurement Policy guides us in sourcing sustainable goods and services that align with our environmental and social criteria while maximising cost efficiency and supporting our ESG commitments.

The Group Procurement Team implements ESG assessments in our supply chain with the support of the Group Legal Team and Group Risk Team. This ensures we partner with suppliers who align with our operational needs and sustainability commitments.

Our performance

Investing in

our community

Better understanding our supply chain

We have categorised our supply chain into three tiers, based on spend volume and strategic value, to inform our due diligence process:

Aligning our

supply chain

- Tier 1: suppliers with high spend volume and critical to delivering on our strategy;
- Tier 2: suppliers with high spend volume but limited strategic business value; and
- Tier 3: all other suppliers.

In 2024, our Human Rights and Modern Slavery Roadmap was completed and endorsed by the Board, reinforcing our commitment to mitigating human rights and modern slavery risks in our supply chain. We have completed third-party Modern Slavery Assessments on all Tier 1 and Tier 2 suppliers through the Ethixbase360 Platform. The next phase of this assessment is to issue modern slavery questionnaires to these suppliers, with a goal to have all questionnaires completed by 1 July 2025.



95%

of our suppliers are based in Australia



Currently, 95% of our suppliers are based in Australia. In 2023, our supplier assessment against the International Trade Union Confederation (ITUC) Global Rights Index and the Global Slavery Index determined that two of our suppliers based in India and the Philippines had a medium risk rating. In response, we reviewed these suppliers by ensuring they completed our questionnaire and were assessed by our third-party due diligence platform. No material risks were identified through this process.

In 2024, we made progress in improving the robustness of our ESG assessment framework through third-party assessment tools and audit trails available in the EthiXbase360 platform. ESG credentials are now in place within the assessment framework for new Tier 1 suppliers.



Our strategy in action

Remaining accountable and transparent

Reporting on our sustainability journey strengthens stakeholder relationships and highlights areas for improvement. We aim to align our reporting with best practices and communicate our ESG approach in a transparent way. By setting targets for accountability and conducting ourselves with integrity, we ensure positive outcomes for our customers, clients, employees, suppliers and other stakeholders.

Our commitments	2024 Progress
We are committed to reporting on our progress and sustainability performance annually through our Sustainability Report.	 We have continued to mature our reporting approach and communicate progress through our annual Sustainability Report.
We are aiming to increase our internal and external communication on our sustainability strategy and transparently share information on our website.	 Information on our sustainability strategy and access to our latest report is available on our website: https://www.smartgroup.com.au/about-us/sustainability/
We are committed to conducting our business ethically and with integrity.	Ongoing
Completed / Target Met	Not Started / Off Track

Our approach

Transparency, accountability and reporting

Our sustainability strategy includes set targets and reporting on our performance that holds us accountable. We are committed to measuring and transparently reporting on our results annually while expanding our data collection to address stakeholder interests. Internal working groups and action plans support each focus area of our strategy, with progress reported to the ESG Committee regularly.

Our Disclosure and Communications Policy ensures timely and accurate information is disclosed to:

- Comply with legal obligations for continuous disclosure;
- Present company announcements clearly and based on evidence;
- Provide equal access to material information for all shareholder; and
- Facilitate effective shareholder communication and participation in general meetings.

Ethics and integrity

We are committed to ethical and responsible conduct. Key policies govern our approach:

Smartgroup Code of Conduct

 Sets clear behaviour standards for all employees, including how our core values should guide all decisions that affect customers, clients, team members and corporative governance.

Smartgroup Ethics Policy

 Ensures fairness in all stakeholder dealings to avoid conflicts of interest. Each team member must report any corrupt, fraudulent or other illegal activities, which are then investigated and addressed urgently.

Gifts, Entertainment and Political Donations Policy

 Regulates interactions with third parties to ensure team members consistently act in an ethical manner and comply with local regulations and laws.

Smartgroup Anti-Bribery and Corruption Policy

 Prohibits the acceptance and distribution of money and any other benefit that could be interpreted as an inducement, secret commission, facilitation payment or bribe.

Speak Up Policy

 Encourages team members and external partners to report concerns without fear of reprisal. Reports can be made anonymously through the Smartgroup Speak Up Portal, which utilises the Whispli platform. The reports submitted through the Smartgroup Speak Up Portal are assessed by an independent third-party expert to enhance confidentiality of the reported concerns.

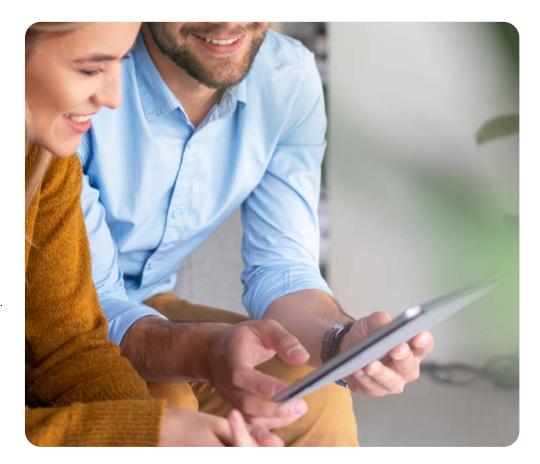
Privacy Policy

Governs the protection of personal information.

Trading Policy

• Ensures compliance with insider trading laws.

All these policies are available on the intranet, and employees undergo regular training. We have zero tolerance for breaches and adherence is monitored, with material exceptions reported to our Board quarterly. We take the investigation of breaches seriously to mitigate or redress any negative impacts. To read more about our policies, please visit our website.



Our performance

Aligning our reporting to best practices and standards

Our 2023 Sustainability Report was the first completed in accordance with GRI Standards. In 2024, we have continued to deliver against our disclosure roadmap and completed a qualitative scenario analysis risk assessment, which included an analysis of our climaterelated risks and opportunities for two distinct climate scenarios (high and low emissions) over the short, medium and long term. Our goal is to align all our reporting with the new mandatory climate reporting requirements outlined in the Australian Sustainability Reporting Standards (ASRS), developed by the Australian Accounting Standards Board (AASB) by 2026.

In this reporting period, there were no instances of regulatory non-compliance, fines or sanctions. There were also no legal actions regarding anti-competitive behaviour, anti-trust or monopoly practices.

Implementing anti-corruption measures

We continued to assess all our operations for corruption risks and to provide training to build knowledge across all team members, from the Board and Executive Leadership Team to our customer service agents. Our policies are communicated externally to business partners on our website and there have been no incidents or legal cases regarding corruption in 2024 or any prior year.

Increasing engagement with our grievance mechanisms

We have multiple channels available for anyone to raise concerns about responsible business conduct and any breaches of policy, and for customers to lodge complaints. We assess the effectiveness of these channels based on the level of use, survey feedback and by engaging with external specialists.

Speak Up Policy

 Encourages employees and external stakeholders to report actual or potential instances of misconduct without fear of reprisal. Smartgroup conducts employee compliance training and awareness initiatives annually to build employee trust and enhance their engagement with the Smartgroup Speak Up Portal, which is used for reporting concerns.

Internal employee grievance system

 Team members can report concerns and seek advice from their line manager, or our People and Culture Team.

Engagement surveys

 Feedback can be provided anonymously on a broad range of topics.

Risk culture surveys

 Offer insights into the maturity of our risk culture and awareness of risk management across the organisation.

Disputes resolution process

 Customers can raise complaints or provide general feedback to us. Details are available on our website.



Sustainability Strategy

Smart Solutions

Designing solutions for seamless customer experience while reducing our negative impacts

Smartgroup designs and delivers products and services that ensure a seamless customer experience and address our environmental and social impact. By investing in technological innovations, we have continued to streamline our services, and promote access to EVs and sustainable options for our clients and customers.

WE AIM TO:

- · facilitate access to low-emissions mobility and green energy;
- deliver great client and customer experiences;
- simplify operations to reduce complexity and risk; and
- · support our clients and customers in meeting their sustainability goals.



Enabling

net zero



Smart Solutions

Enabling net zero

We are uniquely positioned to support our clients and customers to enhance their sustainability performance through the products and services we provide, while accelerating our collective transition to net zero.

Our commitments	2024 F	Progress
We will extend our Carbon Offset Program to Autopia and Smartfleet by the end of 2023.	•	Our Carbon Offset Program is now available to both Autopia and Smartfleet customers.
We have set a target that 20% of our novated lease and fleet-managed new vehicle orders will be EVs by the end of 2026.	•	In 2024, 31% of all new novated lease and fleet vehicle orders were EVs.
We will offset 100% of our direct fleet emissions, including car-embodied emissions by 2026.	•	In 2024, all direct fleet emissions were offset.
We will explore alternatives to establish a partnership with a green energy provider to complete the ecosystem for our EV novated leasing customers.	•	We have confirmed our partnership with Intellihub to offer their renewable energy solutions to customers starting in 2025.
Completed / Target Met	• No	t Started / Off Track

Our approach

Innovation and technology

We are committed to supporting our customers to make sustainable choices by facilitating access to EVs and other solutions that help minimise their carbon footprint. Innovation is critical in our approach, and we are continually investing in ways to simplify our operations and broaden our EV offering to reduce the GHG emissions of our services. You can read more about our digital transformation journey on page 34.

Enabling client and customer sustainability

We strive to make EVs an attractive and affordable option for our clients and customers. In addition to making the transition simple and cost effective, we are also providing solutions to accelerate the full EV ecosystem, including access to green energy and charging technology.

We continue to support our customers with internal combustion engine (ICE) vehicles, which make up a significant portion of cars leased, to make informed choices to sustainably manage and use their vehicles. Our guidance includes commencing the roll-out of a new leasing quote template featuring vehicle-specific Environmental and ANCAP ratings. Our goal is to complete this roll-out in 2025.

Enabling

net zero



Smart Solutions

Our performance

Accelerating the EV transition

As more affordable EV models enter the Australian market, we have focused on scaling our EV offering to grow our fleet. In 2024, EVs represented 44% of our new novated lease vehicle orders, an increase of 20%. We continue to educate our customers on the advantages of leasing an EV so they can make the most of current savings.

As an industry, Australia has tripled its EV market share since 2022. Novated leases for electric vehicles have surged since the introduction of the Electric Car Discount Policy in July 2022.

EV growth has continued in 2024, generating about 12% market share of passenger and SUV sales.

This year, we have welcomed an additional partnership in the renewable energy space. Our new partner Intellihub will begin offering their renewable energy solutions to our clients and customers in 2025. These offerings will include affordable subscription access to solar, battery and electric vehicle charging solutions, to help our customers reduce their power bills.

For our fleet clients, we are supporting our clients to help them develop tailored transition plans to make the switch to EVs or hybrid vehicles as cost effective as possible.

Supporting clients and customers to meet their sustainability goals

Our Carbon Offset Program, launched in 2008, allows customers to contribute to offsetting their novated lease vehicle emissions. Through the program's environmental partners Greenfleet and Carbon Positive, we are continuing to invest in restoration projects across Australia.

In 2024, approximately \$1.5 million from the program was allocated to support projects across Australia including New South Wales (Riverbend), Victoria (Mt Emily, Territory, and Jumbuk), Queensland (Wooden Hut and Ivory Flat), and Western Australia (Eurady Reserve). We also completed the expansion of this program to our Smartfleet clients and Autopia customers in 2024.

We do not invest in certified carbon credits through the ACCU scheme. Instead we have chosen to direct the investments from our Carbon Offset Program directly into Australian based restoration projects with trusted longstanding partners. We undertake governance around our partners, including annual reporting, periodic relationship meetings and site visits.

Advancing the blue carbon economy

Through our Carbon Offset Program, Smartgroup is also a donor to the Blue Carbon Ecosystem Restoration Project led by The Nature Conservancy (TNC).

Blue carbon (the carbon stored in coastal ecosystems) is gaining traction as an important driver for mitigating climate change. The project aims to restore and enhance the coastal wetlands over a 12,000-hectare area in South Australia to improve the biodiversity of the local ecosystem and protect the coastline against climate change impacts, such as rising sea levels.

In 2024, the project reached a significant milestone with construction starting at Webb Beach, which adjoins the Adelaide International Bird Sanctuary National Park. In addition to \$750,000 of funding from Smartgroup, the project received \$2.9 million from the Australian Government.

2024 Progress Scaling our EV offering of our new novated lease vehicle orders are EVs. as more affordable EV models enter the Australian market. Carbon Offset Program was allocated from the program to support projects across Australia. Blue Carbon \$750k funding to help advance a 12,000-hectare coastal wetlands restoration project in South Australia.

Smart Solutions

Case study

Supporting our customer's energy transition

Our partnership with Intellihub is enabling Australian households to manage energy more efficiently by simplifying access to solar power and electric vehicle (EV) solutions. By integrating smart metering technology with solar and storage systems, we are helping households take greater control of their energy use while reducing costs and environmental impact.

For a typical 3-4 person home with a pool and an average energy use of 530 kWh per month, the recommended package—assuming adequate roof size and rotation—is a Medium Kit consisting of 8.8 kW (20x) solar panels and a 12.8 kWh battery. This system is designed to cover household energy consumption effectively, reducing reliance on the grid and ensuring efficient energy use.

Intellihub's smart metering provides realtime data and insights, making it easier for customers to manage their energy use without the need for technical expertise. This might include powering their home during peak periods, charging an EV overnight, or even sharing surplus energy with the grid. From selecting the right solar and storage systems to installation and ongoing management, customers can access a streamlined service that reduces barriers to adoption. For EV owners, this means a straightforward way to integrate charging solutions into their homes alongside solar energy systems. Given that Australians have already purchased more than 70,000 EVs this year alone, seamless energy integration is more important than ever.

By reducing reliance on the grid and ensuring efficient use of stored energy, households are also better protected from fluctuating electricity prices. Additionally, optimising energy use supports broader sustainability goals by reducing demand for fossil fuel-based energy sources. Australia's solar capacity is expected to reach 22.6 GW by 2030, with 1.5 million EVs on the road, making smart energy management a critical enabler of the country's transition to a low-carbon future.

This partnership reflects our commitment to making renewable energy solutions more accessible and practical. Together with Intellihub, we are supporting households in their transition to cleaner energy systems while contributing to a more sustainable future.



Smart Solutions

Digitalising our customer experience

By investing in technology solutions and driving innovation, we continue to streamline and simplify our services to deliver excellent client and customer experiences.

Our commitments	2024 Progress	
We aim to complete the delivery of key digital assets as part of our Smartgroup strategy by the end of 2024.	 Key digital projects were delivered in 2024, including the new Smart website and enhanced Novated Leasing Calculator. 	
We will achieve a demonstrated year-on- year increase in digital-only interactions with customers from a 2022 baseline.	 In 2024, the delivery of key digital projects resulted in our digital-only interactions increasing year-on- year across a range of engagement points: 	
	Website traffic: 2023 vs 2024	
	Smartleasing: up by 31% (note: Jan 1 – Nov 17 2024)	
	Smartsalary: up by 25% (note: Jan 1 – Nov 17 2024)	
	Autopia: up by 10%	
	AccessPay: up by 24%	
	Lead generation	
	53% of all leads generated from Digital in 2024.	
	Webinar attendance	
	In 2024, we held a total of 3,647 webinars (up by 23%), which engaged with 57% more attendees compared to the previous year.	
Completed / Target Met In Progress Not Started / Off Track		

Our approach

Increasingly, clients and customers want to engage with us in a way that is accessible to them. By offering secure digital interfaces, we can:

- Maximise product accessibility for potential customers;
- Simplify solutions, enabling customers to self-educate; and
- Free up time for our consultants to focus on providing high-value services.

Digital projects are central to our business strategy. We use several online tools to monitor traffic, track interactions and analyse user preferences to improve client and customer experiences. Progress on our digital transformation strategy is reported in our Half Yearly and Annual ASX announcements.

In our salary packaging business, we have also rolled out digital salary packaging cards with Google Pay and Apple Pay, enabling our customers to easily access their salary packaging Living Expenses and Meal Entertainment accounts without the need for a plastic card. Approximately 50% of salary packaging card customers have taken up this functionality and transact using a digital card.

We also continue to focus on improving our digital sign-up process for customers, making it easier for our customers to engage with us without the need for paper-based forms or unnecessary phone calls.

Enabling

net zero

Smart Solutions



smart.com.au

A simpler, single destination with better self-service capabilities, interactive tools and easier navigation from any device.



Our performance

Unveiling smart.com.au

The Smart website makes it easier for clients and their employees to unlock the benefits of our salary packaging and novated leasing services. More than 600 pages from our previous Smartleasing and Smartsalary websites have been consolidated and simplified into a single destination with enhanced user experience, including better self-service capabilities, interactive tools and easier navigation from any device.

Our Web Content Accessibility Guidelines (WCAG) 2.2 AA compliance score for smartsalary.com.au exceeded the industry benchmark in 2024. smart.com.au replaced smartsalary.com in November 2024 and already partially complies with the WCAG 2.2 AA standard. We continue to monitor the site's performance against this standard and are taking active steps towards increasing our compliance score. This performance reflects our commitment to making our digital content more accessible to more people.

We have also launched a real-time multilingual chat capability to address language barriers, improve accessibility and boost customer satisfaction with real time translation into 100 different languages.

Enhanced tools on the Novated Leasing Calculator

The Novated Leasing Calculator is an integral part of enhancing the novated leasing settlement process by streamlining digital quoting and improving customer engagement.

Features of our enhanced calculator experience include:

- 24/7 access for convenience;
- Ability to find and compare vehicles, costs and potential tax savings;
- Personalised approach to purchasing accessories, services and insurance;
- · Instant quotes displaying tax savings;
- · Option to save quotes with real-time updates;
- Expert support through web chat or scheduled callbacks;
- Online credit application with fast turnaround; and
- Access to competitive pricing through our dealer network across Australia.

Expanding on cybersecurity measures

In the reporting year, we implemented a comprehensive cybersecurity program with key initiatives such as:

Detection and response

 We enhanced the Security Operations Centre (SOC) to handle confidential information, vulnerability management and incident response.

Identity governance

 We implemented CyberArk for improved user identity and access management, and we are planning SailPoint integration to automate user access reviews.

Data protection

 Data loss prevention (DLP) was the priority, which saw us incorporating Microsoft Purview, as well as Varonis for data monitoring.

Data governance

 A framework was established encompassing six policies around data lifecycle management, classification and handling, data quality, data governance and operations, privacy, and data retention.





Smart Customers

Promoting sustainable choices by our clients and customers by providing relevant resources for decision-making

Our goal is to support our clients and customers in their everyday decision making to enhance their financial wellbeing and promote sustainable choices, by providing valuable information and resources.

WE AIM TO:

- Increase financial literacy to boost their economic wellbeing; and
- Promote sustainable car choices by providing clear information on efficient car choice use, maintenance and emissions.



Our strategy in action

Facilitating financial wellbeing

Facilitating financial wellbeing is central to our mission, and we are committed to ensuring our solutions continue to evolve and provide benefits. To support our clients in promoting their employees' financial wellbeing, we offer services such as salary packaging, novated leasing, and rewards programs.

Our commitments	2024 Progress
We will implement an enhanced Smartgroup financial benefits and wellbeing platform targeted for release in 2024.	 The new Smartrewards website was rolled out in December 2023. Throughout 2024, we enhanced the program by offering access to even more savings from leading Australian brands, and a financial wellness program.
We will continue to investigate other opportunities to provide our customers with relevant information and resources to improve their financial wellbeing.	 We entered arrangements with Qantas providing our customers with Frequent Flyer points rewards and with Commonwealth Bank for access to CommSec and other offers.
Completed / Target Met In Progress	Not Started / Off Track

Our customers

445,000

active salary packaging customers, with more than 106,000 vehicles managed across novated leasing and fleet portfolios.



Our approach

Client and customer education

We help our clients and customers make informed decisions that support their financial wellbeing and to educate them on reducing their environmental footprint. You can learn more about our initiatives to drive the uptake of EVs and promote sustainable practices on page 32.

Our services support more than 445,000 customers across Australia to reduce their taxes and maximise their take-home pay. We are committed to improving financial literacy by providing resources that encourage sustainable choices, and we ensure our products and services are accessible through tools that make it easier to find options that are most relevant to their needs.

Our strategy in action

Our performance

Rolling out the enhanced Smartrewards program

First launched in 2023, our Smartrewards program offers customers access to everyday savings through their Smart online account. In 2024, we enhanced the program so that customers could receive additional discounted eGift cards to help them save on groceries. electronics, clothes, entertainment, travel, and more. Customers can also take advantage of discounted dining at restaurants nationwide, and other online offers from leading retailers. as well as an online library promoting health and wellbeing where they can access videos, articles, recipes and even mortgage healthchecks.

Teaming up with Qantas and Commonwealth Bank

In 2024, we teamed up with Qantas and Commonwealth Bank. Our Qantas offer enabled Frequent Flyer members who took out a novated lease with us before 31 July 2024 to earn 25.000 bonus Qantas Points with their lease. After the launch period, this offer has continued with all customers eligible to earn 10,000 Qantas Frequent Flyer Points every time they take out a lease. Our Commonwealth Bank arrangement provided customers with access to a Commonwealth Bank promotional offer of 10 free trades on the CommSec platform.

Enhancing financial wellbeing through tools and education

We have been diversifying the content formats and channels where we offer educational resources, ranging from face-toface conversations and on-demand webinar sessions, to videos and self-service tools on our websites. We expanded our content library with new informative videos explaining our salary packaging and novated leasing services as well as how the Federal Government's Electric Car Discount Policy can benefit customers.

Our monthly customer newsletter highlights smart ways to save and spend with salary packaging, from how to dine out for less to shopping on a budget. Included in these newsletters are helpful articles on topics such as money-saving tips and entertaining the kids at home on a budget.

The new Smart website showcases our helpful calculators and tools to help our customers better self-serve and manage all their benefits to maximise their take-home pay. The improved digital experience also makes it easier than ever for new customers to start a salary packaging application or novated leasing journey.

We have also continued driving engagement with the AccessPay salary packaging calculator we rolled out in 2023. Customers can follow simple and practical steps to see how salary packaging could benefit them.

Smartrewards





Promoting sustainable and smart driving behaviours

Our novated lease offering supports customers throughout the car ownership journey, helping them to make sustainable mobility decisions that improve their financial wellbeing. Our fleet management services assist clients in all aspects, from funding and fleet use to infrastructure and education.

Our commitments	2024 Progress
We will launch a program of educational content about sustainable car choices, car use and maintenance by the end of 2023.	 Completed in 2023. In 2024, we continued to share a range of content around sustainable car choices and the benefits of EVs, such as car reviews and testimonials, to help our customers make informed decisions.
We will publish environmental and ANCAP safety ratings for our novated vehicles as part of our novated leasing quotes by the end of 2023.	 We have commenced the roll out of new novated leasing quote templates that include environmental and ANCAP safety ratings. We aim to complete this for all customers in 2025.
We will provide access to customer- specific carbon footprint calculators by the end of 2023.	 Completed in 2023. We continue to promote access to these carbon footprint calculators through our online sustainability resources.
Completed / Target Met	Not Started / Off Track

Our approach

Our priority is providing educational resources to promote sustainable and smart driving behaviours by guiding customers to:

- · maximise vehicle life span and resale value;
- · ensure vehicle safety and suitability;
- optimise cost-effectiveness and tax benefits; and
- · understand the vehicle's emissions impact.



Our performance

Supporting the EV transition and promoting fleet efficiency

In response to the Federal Government's Electric Car Discount Policy, and with more affordable EV models being introduced to the Australian market, and to help people understand and familiarise themselves with EVs we have been promoting EV adoption by delivering educational content to our clients and customers. This has included videos, articles, social media posts, webinars and newsletters highlighting sustainable car choices.

For our novated leasing customers, we organised more than 50 "EV Days" across Australia to educate them on the benefits and tax savings they could receive. Some of these events offered test drives.

Additionally, we looked to support our fleet clients, specifically around EV infrastructure. This included connecting them with NHP Australia, our partner that provides on-the-go EV charging solutions. We are in the process of finalising other commercial arrangements to supply EV charging equipment so we can better-support fleet clients with setting up their on-site charging infrastructure.

We also continued offering test drives through our manufacturers to encourage uptake, and support our fleet clients with their strategic planning. For our not-for-profit fleet clients, we enabled them to trial numerous hybrid vehicles through our 9-Month Buy-Back program. This also helps them to transition to lower-emissions vehicles.

To further promote fleet efficiency, we facilitated on-demand car sharing through our pool vehicle booking system and with Telematics by Smartfleet and FleetComplete.

Reducing waste in our customer and client services

In 2024, we switched from plastic to recycled cards, which contain 50%-70% recycled PVC, for some of our services, including leasing customers using the Vehicle Maintenance Program and Roadside Assistance service.

Industry collaboration

In 2024, we participated in various industry events, such as National Automobile Leasing and Salary Packaging Association's (NALSPA)'s survey for PHEV owners to understand the usage habits and role PHEVs play in the EV journey.

We continued collaborating with NALSPA, the EVC and the AFIA to advocate for affordable EV charging infrastructure and parity of treatment between EVs and ICE vehicles in novated leasing.

By aligning with suppliers who have relationships with Tyre Stewardship Australia (TSA), we continued to address the environmental impact of end-of-life tyres.



Smart people

Our strategy in action

Our people make this possible

Creating a diverse and thriving culture that recognises that our team is at the centre of everything we do.

Our workplace promotes equal access to opportunities and fosters a supportive environment for all. It is our responsibility to ensure everyone is treated equally and that we are celebrating diversity, creating a thriving workplace where everyone is empowered and can contribute effectively.



Developing and engaging

our team members

Our People Make This Possible

Creating diverse and inclusive teams

Creating diverse

and inclusive teams

Everyone at Smartgroup deserves to feel valued, respected and welcomed. We embrace diversity in backgrounds, experience, perspectives, education, age, race, ethnicity, abilities, religions, sexual orientation, marital status and more. Our culture thrives on mutual respect, recognising that our differences strengthen the team. We are committed to maintaining a diverse and inclusive culture, where everyone can bring their best selves to work.

Our commitments	2024 Progress
We will maintain our Employer of Choice for Gender Equality with Workplace Gender Equality Agency Australia (WGEA).	 We achieved the Employer of Choice for Gender Equality citation again for 2023-2025. The WGEA Employer of Choice for Gender Equality citation for 2025-2027 will be submitted in 2025.
We will maintain 40/40/20 gender representation across all levels.	 In 2024, women represented at least 40% of all levels of the business including at the executive level.
We will achieve 40/40/20 gender representation at the Board level by the end of 2024.	 In 2024, our Board comprised 43% female and 57% male.
We will implement the Accessibility Action Plan by the end of 2024.	As part of implementing the Accessibility Action Plan, we rolled out several initiatives in 2024, including establishing an Accessibility Employee Network Group, taking up silver membership with the Australian Disability Network (ADN), participating in ADN's Accessibility and Inclusion Index, offering all team members Disability Confident Workforces training, and celebrating International Day for People with Disability. The 2025 Accessibility Action Plan was endorsed
	by the Human Resources and Remuneration Committee in November 2024.
Completed / Target Met	Not Started / Off Track

Our approach

Diversity, equity and inclusion

We have a responsibility to ensure all team members are treated equally and that diversity is celebrated so our people can bring their best selves to work and fulfil their potential.

We have formed a Smart Diversity Council that drives initiatives across four key pillars to meet the targets set in our Diversity Strategy:

- · Gender Equality;
- Accessibility:
- · Pride; and
- First Nations.

These four pillars are supported by strategies and actions plans, including:

- · Gender Equality Strategy 2023-2025;
- · Accessibility Action Plan 2025; and
- Innovate Reconciliation Action Plan 2024.

We also established Diversity Employee Networking Groups to enable us to consult with, and hear directly from, our people about ongoing opportunities for improvement.



Our strategies are supported by a comprehensive set of policies, including:

- · Equal Employment Opportunity Policy;
- Flexible Working Policy;
- · Parental Leave Policy;
- · Learning and Development Policy;
- · Recruitment and Selection Policy; and
- · Diversity Policy.

In 2024, we continued to actively support Respect@Work by updating our policy and providing training, which included online learning for all team members and in-depth face-to-face training for leaders.

We monitor our performance and regularly report on our progress, both internally and externally. Our organisational diversity and inclusion Key Performance Indicators are reviewed quarterly by the Diversity Council, and we report to the Board and the Human Resources and Remuneration Committee annually. We also share our annual progress by reporting to the WGEA in line with statutory requirements.

Our performance

Gender equality

We are proud to be recognised again for our efforts in progressing gender equality. We achieved 'Inclusive Employer' recognition with the Diversity Council Australia. This is assessed through the Inclusive Employer Index. We plan to submit for the Index again in 2025.

In 2024, we were recognised with the Workplace Gender Equality Agency Australia (WGEA) Employer of Choice for Gender Equality citation for the fourth consecutive year. We have also maintained our 40/40/20 gender representation at all levels of the organisation.

The Board has also committed to ongoing review of the gender pay gap across Smartgroup. As reported to WGEA in 2024, Smartgroup's gender pay gap at the medium base salary is 01% and for total remuneration it is 10.1%. As part of our Gender Equality Strategy for 2023-2025, we will continue to monitor our pay gap to ensure it is maintained or reduced.

We report to the WGEA annually in line with our statutory obligations. As part of this, we assess the organisation-wide gender pay gap for total remuneration, and we have seen continuous improvement year on year. In 2024, our gender pay gap for median total remuneration was 10.1% and our median base salary gender pay gap was 0.1%, which are both well below the industry benchmarks.



Developing and engaging our team members

Our strategy in action

Our People Make This Possible

	SMARTGROUP	INDUSTRY COMPARISON
Average (mean) total remuneration	9.5%	14.2%
Median total remuneration	10.1%	16.3%
Average (mean) base salary	6.9%	13.0%
Median base salary	0.1%	15.1%

Source: Smartgroup WGEA reporting as at 31 March 2024 and WGEA Reporting Industry Benchmark Report, November 2024. Comparison group: Finance and Investment Service with employee range of 500-999. The Industry Comparison Group is generated by a combination of the Australian and New Zealand Standard Industrial Classification (ANZSIC) industry class and equivalent sized organisations.

We continue to monitor and improve our gender diversity, particularly in our recruitment process. Our applicant tracking system allows us to capture accurate gender data in filled roles, helping us identify areas requiring greater focus.





Case study

Advocating for gender equality on International Women's Day

On 8 March 2024, we celebrated International Women's Day with a networking breakfast "Accelerating Gender Equality at Smartgroup".

We hosted a panel of guest speakers, including Yvonne Weldon AM, Wiradjuri Elder and Rebecca Roberts from St Vincent's Health, Deborah Homewood, Non-Executive of Smartgroup, accompanied by our Chief People Officer, Tanja Maccan. The panel was hosted by Jordan Baker from the Sydney Morning Herald, and insights were shared on gender equality and the importance of the economic empowerment of women.

Additionally, we hosted a corporate table at the UN Women's Luncheon in Melbourne to support UN Women Australia and to raise awareness for their work in the Pacific and beyond.

Accessibility

As a member of the Australian Disability Network, we submitted for the Access and Inclusion Index. This enabled us to receive valuable feedback to develop our first Accessibility Action Plan, which was endorsed by the Human Resources and Remuneration Committee in November 2024. In 2024, we also established an Accessibility Employee Network Group.

We have implemented measures to support accessibility this year, including the use of alternate text in communications, and providing disability awareness training opportunities for the International Day of People with Disability on 3 December 2024.

LGBTO+

During Pride Month and Wear It Purple Day on 30 August 2024, we raised awareness of LGBTQ+ inclusion by showcasing team member stories and experiences. We also established a Pride Employee Network Group.

We educated our team members on the use of pronouns and incorporated this into our standard email signatures. The LGBTQ+ Strategy for 2025 will be approved in Q1 2025.



Smartgroup International Women's Day 8 March 2024. L to R Yvonne Weldon, Rebecca Roberts, Tanja Maccan, Deborah Homewood and Jordan Baker.



Strengthening our Aboriginal and Torres Strait Islander connections

Smartgroup acknowledges the Custodians of Country throughout Australia. We pay our respects to them and to Elders past and present and thank them for their ongoing custodianship of this land and community.

Our commitments	2024 Progress	
We will deliver our Reflect Reconciliation Action Plan and work on creating an Innovate Reconciliation Action Plan.	 Our Innovate RAP was launched in January 2024 and will be operational until end of 2025. Our Reflect RAP was delivered in 2023. 	
We will implement an Aboriginal and Torres Strait Islander employment program by 2024.	 Our Aboriginal and Torres Strait Islander employment program has been developed by a dedicated working group. Employment partners have been identified and the program will be launched in Q1 2025. 	
Completed / Target Met In Progress	Not Started / Off Track	

Our approach

We are committed to meaningful reconciliation with First Nations people across our business. Our vision is for equal financial and social wellbeing for Aboriginal and Torres Strait Islander peoples, which includes fostering workplaces that empower their employees to safeguard their financial wellbeing.

Our Reflect RAP focused on understanding our Aboriginal and Torres Strait Islander stakeholders, raising awareness of our commitment to reconciliation, and embedding cultural recognition of Indigenous cultures. In 2024, we implemented our Innovate RAP, which had been endorsed by Reconciliation Australia in 2023. This outlines practical actions to increase Indigenous representation in our business and supply chain, as well as amplifying community support.

Our RAP Working Group governs the progress we are making, reporting internally to the Human Resources and Remuneration Committee of the Board and externally to Reconciliation Australia on an annual basis.

Creating diverse

and inclusive teams

Our performance

Raising cultural awareness and recognition

We continue to provide cultural awareness training for all team members. Acknowledgement of Country is embedded at the start of meetings and a meeting room in each of our offices has been renamed with traditional place names - for example. Gadigal room in our Sydney head office. Aboriginal artwork is also featured in the Sydney head office, including a map of Indigenous Australia and the artwork 'kengathanak-thangi' (Grow Mother Country) by Tatti-Tatti/ WadiWadi/Muddi Muddi and Wajak/Kaardjin artist. Jade Kennedy, which is also featured on page 2 of this report.

In 2024 we were excited to commence a new partnership with Clontarf Academy in South Australia. The partnership supports the academy to improve the education, discipline. life skills, self-esteem and employment prospects of young Aboriginal and Torres Strait Islander men and boys and by doing so equips them to participate more meaningfully in society.

The RAP Working Group continues to provide guidance through the First Nations Best Practice Guide, which is published on our intranet.



Improving procurement outcomes with **Supply Nation**

Strengthening our Aboriginal and

Torres Strait Islander connections

We have continued to partner with Supply Nation to improve procurement outcomes with Aboriginal and Torres Strait Islanderowned businesses. Increasing our spend with Aboriginal and Torres Strait Islander-owned businesses will be a core focus of our Innovate RAP for 2025.

Hosting events and programs

We held numerous events to celebrate National Reconciliation Week (NRW) from 27 May to 3 June 2024. These included Bush Tucker workshops, enabling team members to learn about Australian native ingredients before sampling a range of ethically sourced treats.

We also developed our first Aboriginal and Torres Strait Islander employment program. We have set a 2026 target to increase the number of our team members who identify as Aboriginal or Torres Strait Islander to 2%.

Case study

Clontarf **Foundation**

New sponsorship supporting **Aboriginal and Torres Strait** Islander men and boys to excel in society through education and opportunities.

Aligned with our sustainability goals of empowering communities and creating positive social impact, our partnership with the Clontarf Foundation focuses on improving life outcomes for young Aboriginal and Torres Strait Islander men and boys.

The Clontarf Foundation operates 162 academies across Australia, supporting over 12,000 students annually. Their unique model leverages students' passion for football to increase school attendance and engagement. In 2024, 80% of Clontarf Year 12 students completed Year 12, with many transitioning into higher education, vocational training, or employment.

We aim to support these academies through this partnership to enhance student programs, foster workplace engagement, and create employment pathways. This collaboration reflects our commitment to social responsibility and long-term community investment.



Developing and engaging our team members

Investing in our people, their wellbeing and development is essential to fostering an engaged, high-performing culture. We prioritise building capability at all levels, measuring engagement and creating internal promotion pathways.

OUR COMMITMENTS	2024 PROGRESS
We aim to increase internal promotion and training opportunities.	 21% of all appointments were made with internal candidates. This was demonstrated with 43 promotions in FY24.
We intend to achieve a 10% increase in average hours of training per team member by the end of 2025.	In 2024, Smart undertook a review of training including delivery methods, content and outcomes. 4,802 hours of training were undertaken by employees in 2024, which is reflective of improvements to streamlined compliance training.
We have a target that at least 15% of all role hires every year should be internally sourced.	 In 2024, we met this target with 21% of all role hires internally sourced.
Completed / Target Met In Progress	Not Started / Off Track

Our approach

Employee engagement and development

We provide career development opportunities, training and benefits for all team members, which are supported by the following policies:

- · Learning and Development Policy;
- · Education Assistance Policy; and
- · Recruitment and Selection Policy

We track engagement and development through Key Performance Indicators, with regular reporting to the Board on appointments and promotions, and to our Senior and Executive Leadership Teams on recruitment and retention outcomes. Engagement is assessed at both team and organisational levels, with action plans developed and monitored throughout the year. Quarterly Pulse surveys assess employee sentiment, with key themes shared across the business and to the Board. In 2024, the average training for female employees was 5.66 hours, compared to males with 6.77. This was the result of more males hired during the year coupled with higher turnover of males.

Our employee benefits are designed to attract, engage and retain talent. The benefits include paid parental leave, a wellbeing fund, discounted health insurance, an employee share scheme for permanent employees, and death and disability insurance as part of our superannuation package.

Our performance

Investing in training and capability building

Key initiatives in 2024 included a new leadership development program, team member resilience and wellbeing training, skills development in Agile and Growth mindset, and ongoing cultural awareness training. We held Lunch and Learn sessions for informal knowledgesharing on topics such as salary packaging and novated leasing.

In 2024, we launched new and refreshed training courses, including:

- · Managing underperformance;
- · Recruitment skills;
- · Growth conversations:
- Understanding employment contracts and legislation;
- · Risk management;
- · Insider training awareness;
- · Anti-bribery and corruption; and
- · Respect@Work.

We also conducted offsite training for senior leaders on leadership and Agile ways of working.

Our partnership with the University of Technology Sydney provides industry placements for Bachelor of Information Technology students, with a six-month rotation in their first year and a return placement in their third year. We regularly offer secondments to promote on-the-job training and internal career pathways.

Encouraging engagement through transparency and flexibility

To promote employee engagement, we continued our focus on a broader Listening Strategy, which included sessions led by senior leaders to discuss engagement action plans and foster open dialogue. These sessions were vital for sharing ideas and updates on team-member sentiment.

We organised monthly social events, alongside diversity and inclusion activities, as well as regular internal engagement forums where team members could hear from senior leaders and the executive team. Ongoing communication is encouraged through our fortnightly newsletters and Teams channels.

We have adapted our leadership styles to better engage a flexible working team, incorporating team "anchor" days that promote collaboration and operating rhythms with pre-agreed fixed days in the office for each team.





Case study

Supporting the community with Wesley LifeSkills

Wesley LifeSkills is a centrebased program supporting individuals with disabilities to take the necessary steps to find employment or become involved in the community through individual and group activities.

In November 2024, we provided funding to Wesley LifeSkills and sent along 16 volunteers to support the Wesley Out of Home Care group to visit Taronga Zoo. With reduced government funding in recent years, our support enabled this initiative to take place for the first time since 2019.

Employees were able to use their Make A Difference days to participate in this event, enjoying a day out at the Zoo whilst supporting the wonderful work of Wesley Out of Home Care.



Smartgroup Volunteering Day in November 2024 at Taronga Zoo supporting Wesley Out of Home Care.



Ensuring a healthy and safe workplace

The health and wellbeing of our team members is our top priority. We regularly review our practices, policies and initiatives to ensure we create an environment that supports the physical and mental wellbeing of our team and everyone who visits our sites.

Our commitments	2024 Progress	
We ensure our team members have access to tools and resources that allow them to remain safe and healthy in the workplace, both physically and psychologically.	In 2024, we had no significant safety incidents, and we continued to raise awareness by reviewing and updating our training and initiatives. This included the launch of Respect@Work and a Work Health and Safety Action Plan.	
We aim for zero harm and a low lost-time injury frequency rate (LTIFR).	 In 2024, we had a LTIFR rate of 1.95 (rate calculated based on 1,000,000 hours worked). 	
Completed / Target Met In Progress	Not Started / Off Track	

Our approach

Employee health, safety and wellbeing

We aim to create a safe, incident-free work environment by implementing robust Work Health and Safety (WH&S) policies across all jurisdictions in which we operate, including:

- · Work Health and Safety (WH&S) Policy;
- · Incident Investigation and Reporting Policy;
- Hazard and Incident Investigation Reporting Policy;
- Mental Health and Wellbeing Policy;
- · Domestic and Family Violence Policy;
- · Return to Work Policy;
- · Safe Driving Policy;
- · Immunisation Policy;
- · Alcohol, Smoking and Drugs Policy;
- Respect@Work Policy;
- · Equal Employment Opportunity Policy;
- · Fit for Work Guidelines; and
- · Grievance Procedure.

We monitor our performance by tracking Key Performance Indicators, which include engagement with our training, hazard and incident reporting, workers' compensation claims and Employee Assistance Program (EAP) use. These performance outcomes are measured against objectives, which are then used to refine our WH&S plans and targets.

In 2024, our WH&S Committee met frequently, with representatives from all Australian offices, to review statics, incidents and legislative changes, in order to ensure a coordinated approach towards risk management and indicators are regularly reported to the Board.

Our performance

	For all employees and workers	For all workers who are not employees but whose work and/or workplace is controlled by the organisation
Number and rate of fatalities because of work-related injury	0	0
Number and rate of high- consequence work-related injuries (excluding fatalities)	0	0
Rate and number of recordable work-related injuries	3	0
Main types of work-related injury	Stress Claims	Not applicable
Number of hours worked	1,541,692	Not available

Implementing our Respect@Work Action Plan

In 2024, we implemented our Respect@Work Action Plan in line with the Australian Human Rights Commission framework, focusing on preventing gender-based discrimination and sexual harassment. The plan includes training for senior leaders and executives, as well as communications to all employees outlining expected standards of behaviour.

We also refined existing policies, such as our Equal Employment Opportunity Policy and Grievance Procedure, and established new ones, including the Respect@Work Policy. Team members can report issues related to sexual harassment, gender-based discrimination or psychosocial concerns anonymously through our Whistleblower platform.

Additionally, our Wellbeing Fund supports our team members in their health journeys by providing an annual budget for personal health initiatives. In 2024, 638 employees claimed a total of \$8,164 in reimbursements for health and wellbeing expenses.

To ensure safety and wellbeing within our flexible work environments, we also provide ergonomic assessments and guidance for all team members.

To support our employee's mental health and provide them with assistance in any challenging times, our Employee Assistance Program (EAP) offers confidential counselling and external guidance.



Next steps

2024 Progress

Thank you for taking the time to read the progress we are making in the second full year of implementing our Smarter, More Sustainable Tomorrow Sustainability Strategy. Access the GRI Content Index and ESG data used to prepare this report here.

While we are proud of the progress we have made, we recognise the work towards a sustainable future is ongoing. Next year, we will start re-evaluating our strategy to challenge ourselves further to achieve our ambition. We look forward to sharing how our journey will evolve to drive even more meaningful outcomes.

For more information on how we can partner with and support your organisation, please contact us at ir@smartgroup.com.au



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