

16 December 2025

Manager Company Announcements ASX Limited Level 4, 20 Bridge Street SYDNEY NSW 2000

### Amotiv Limited (ASX: AOV): 2025 Modern Slavery Statement

Please find enclosed a copy of Amotiv Limited's Modern Slavery Statement in accordance with the *Modern Slavery Act 2018* for the year ended 30 June 2025, which was lodged in accordance with the legislation on 16 December 2025. This document will be made available on Amotiv's website.

Once the Statement is registered by the Attorney-General's Department, it will be available on the Modern Slavery Statements Register.

For inquiries:
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Announcement approved by the Company Secretary







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# In this Statement

This Modern Slavery Statement describes the actions of Amotiv Limited (Amotiv) and its subsidiaries (Amotiv Group or Group) to identify and address modern slavery risks in the Group's operations and supply chains during the year ending 30 June 2025 (FY25). It is published in compliance with the Australian Modern Slavery Act 2018 (Cth) (the Act) as a joint report by Amotiv and those of its subsidiaries which are reporting entities within the meaning of the Act<sup>2</sup>. Amotiv is headquartered in Melbourne, Australia.

Modern slavery encompasses situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.<sup>3</sup> It is a term reserved for situations of greater severity than mere substandard working conditions or underpayment of workers alone (although these are important indicators). The Act defines "modern slavery" as including various types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; certain illegal practices relating to non-citizens working in Australia; and the worst forms of child labour (where children are subjected to slavery or similar practices, or engaged in hazardous work)3. The Amotiv Group is not willing to tolerate these activities. This Statement explains how the Group manages the risk of them occurring in its operations and

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

Mandatory criteria	Section, Page
1. Identify the reporting entity.	Section 3, Page 7
2. Describe the reporting entity's structure, operations and supply chains.	Section 4, Page 8
<b>3.</b> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Section 5, Page 12
<b>4.</b> Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Section 2, Page 5 Section 6, Page 15
5. Describe how the reporting entity assesses the effectiveness of these actions.	Section 7, Page 21
<b>6.</b> Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Section 8, Page 22
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Section 9, Page 23

This Statement was approved by the Amotiv Board on 11 December 2025.

Until 24 June 2024 the name of the Company was GUD Holdings Limited (ASX: GUD).
 The Reporting Entities covered by the joint Statement are identified in more detail in Section 3, Page 7 of this Statement.
 'Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities' May 2023 (page 8) at: https://modernslaveryregister.gov.au/resources/

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

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

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

The Group continues to focus on the management of modern slavery risk as an important aspect of its overall strategy. The GUD2025 Plan, which has largely been delivered, incorporated a strategy for sustainability, within six environmental, social and governance (ESG) impact areas. Sustainable Sourcing, including managing modern slavery risk, is one of these six identified impact areas<sup>1</sup>. The Group reported on progress in these 6 areas in its 2025 Sustainability Review¹ and has published sustainability data about its FY25 progress<sup>2</sup> on its website.

A key focus during the year was enhancing the Group's supplier evaluation process through a refreshed supplier assessment methodology. The previous three compliance standards - Bronze (Modern Slavery and Labour), Silver (Safety and Nondiscrimination) and Gold (Environment and Ethics) have been aligned to an international benchmark across four pillars comprising i) Labour Standards, ii) Health & Safety, iii) Environmental Management, and iv) Business Ethics, bringing the Group in line with an internationally recognised set of Standards. Amotiv businesses work with suppliers, based on their classification, towards broader social objectives, including safe, non-discriminatory, environmentally responsible, and ethical business practices. The Group's Sustainable Sourcing Code (Code)3 requires supplier adherence to regulatory requirements and compliance with international labour standards, which prohibit serious exploitation and slavery-like practices.

Following its establishment in FY24 to support program management, sourcing, and quality reviews, we have, in FY25, expanded therole of the Amotiv Asia Sourcing Office (ASO), to encompass assurance activities under the Group's Sustainable Sourcing Program. Located in China, the ASO is charged with maintaining close working relationships with suppliers. The ASO supports all businesses across the Group to execute activities under the Program; particularly assessing and responding to modern slavery risks through direct onsite engagement with suppliers in the region. In FY25, the ASO completed 14 on-site supplier audits, fostering closer collaboration with the Group's supplier base and reinforcing its commitment to responsible sourcing.

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

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

As part of this continuous improvement approach, in FY25, the Board reviewed and updated the Sustainable Sourcing Code, the Group's modern slavery risk assessment matrix and other elements of the Program, and are pleased to report the Group's actions and achievements during FY25 and the status of our modern slavery risk management in this Statement.



**David Coolidge** Independent Non-Executive Director and Chair of the Risk and Sustainability Committee



Graeme Whickman Managing Director and Chief

- The six ESG impact areas are detailed in the 2025 Sustainability Review which can be found starting at page 22 of Amotiv's 2025 Annual Report.
- Information on 2025 progress across Amotiv's six ESG impact areas can be found at Sustainability Data | Amotiv Limited
- The Code is available on Amotiv's website under the Corporate Governance tab.

# 1. Modern Slavery Risk - Dimensions and Progress





26 2<sup>nd</sup>-and 3<sup>rd</sup>-Party supplier audits completed in FY25



90% Tier 1 goods suppliers met base level assessment



suppliers assessed in the **Sustainable Sourcing Program** 

89 site visits over 2 years



Proud to be a



# 2. Modern Slavery Governance at **Amotiv**

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

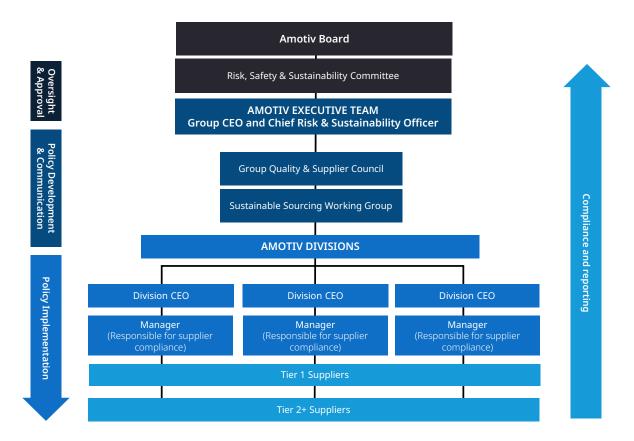
The Code includes standards, and prohibits modern slavery practices. The Program uses the Code standards and the standards of the independent global Supplier Ethical Data Exchange program operated by Sedex Information Exchange Limited (Sedex) for supplier assessment. The Sedex Members Ethical Trade Audits (SMETA) is the preferred audit tool which informs supplier assessments.

Under the Program, Amotiv Divisions are accountable for meeting the Code standards in their own operations, including undertaking due diligence processes for suppliers. They are provided with training, tools and support to enable them to perform their required Program activities. During FY25, they had access to the ASO, which provided "on the ground" assistance in Asia to conduct site visits and assurance activities under the Program.

During FY25, implementation of the Program across the Group and its supply chain continued to be facilitated through the Group's Quality & Supplier Council (Council) and its Sustainable Sourcing Working Group (Working Group). Personnel responsible for sourcing and supplier relationships from each Amotiv Division sit on the Council and are responsible for embedding processes into their businesses to apply the Program in their supply chains.

The Working Group facilitates training and the use of shared resources, such as the Sedex platform, and various tools for enabling implementation of the Program. The Group has subscribed to the Sedex platform for a number of years, and it provides a robust, independent standard. Amotiv businesses provide their suppliers with the Amotiv Self-Assessment Questionnaire (SAQ) or the Shortened SAQ for suppliers classified as lower risk, and accept Sedex-equivalent independent assessments under the Program.





# 3. Reporting Entities

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

This joint Modern Slavery Statement is made by Amotiv Limited and its wholly-owned Australian subsidiary companies who are "reporting entities" within the meaning of the Modern Slavery Act 2018 (Cth)<sup>2</sup>. These are<sup>3</sup>:

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

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

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

This Statement, in accordance with the Act, provides information in relation to global operations of the reporting entities including Amotiv, and therefore covers the Group's global operations and all its subsidiaries.<sup>4</sup>

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



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

A reporting entity is defined in the Act and includes an entity with consolidated revenue of at least \$100 million for the reporting period, and which is either an Australian entity or a foreign entity carrying on business in Australia in that reporting period.

Based on revenue calculations which include revenue from overseas operations
 A list of all the Group's subsidiaries can be found on pages 103 - 104 of the <u>Amotiv 2025 Annual Report</u>

# 4. Structure, Operations and Supply Chains

### **Structure**

Amotiv (ASX:AOV) has been listed on the Australian Securities Exchange for over 60 years. Its registered office is in South Melbourne, Victoria. In August 2025, the Group announced its full year financial results which included global revenue of \$997.4 million. Amotiv owns a portfolio of companies specialising in providing high-quality automotive products and solutions that meet the evolving needs of our customers worldwide. Amotiv's businesses are grouped into three strategic operating divisions: Powertrain and Undercar; Lighting, Power and Electrical; and 4WD Accessories and Trailering.

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

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



# **Operations**

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

The key operations of the Group include:

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

#### **Amotiv Divisions**

Amotiv's businesses are grouped into three strategic operating divisions: 4WD Accessories and Trailering, Lighting, Power and Electrical; and Powertrain and Undercar.

# **4WD Accessories and Trailering Division**



Manufacturing, marketing and distribution of towing, trailering, functional accessories and associated products for the automotive aftermarket and OEM customers.

This Division plays a pivotal role in our strategic imperative to be the leader in 4WD accessories and trailering in ANZ.

































# **Lighting, Power and Electrical Division**



Manufacturing, marketing and distribution of automotive electrical, lighting, power management solutions and associated products for all types of vehicles for the automotive aftermarket and Original Equipment Manufacturer (OEM) customers.

This Division is dedicated to delivering advanced lighting, power, and electrical solutions internationally and ensuring superior customer value.



























## **Powertrain and Undercar Division**



Manufacturing, marketing and distribution of automotive and heavy-duty filters for cars, trucks, agricultural and mining equipment, fuel pumps, clutches, brakes, gaskets, pumps, electronic devices and associated products for the automotive aftermarket.

The Powertrain & Undercar Division is crucial to leveraging powertrain profitability and investing in future-proof adjacencies.

























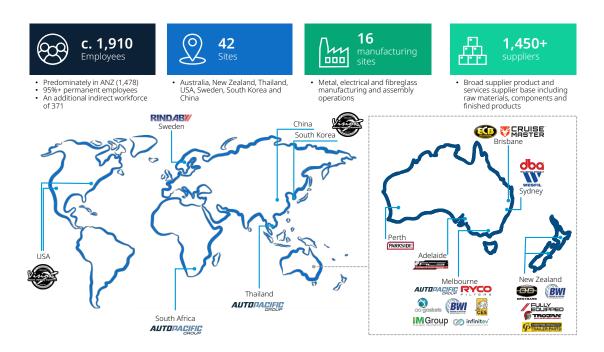








### **Amotiv Operations Footprint and Dimensions**



We invest in our people to develop a high-performing, highly engaged, and diverse workforce. The Group's directly employed workforce includes (as at the end of FY25):

Amotiv Employees by Region<sup>1</sup>

	Australia	Thailand	New Zealand	Asia	N. America	Europe <sup>3</sup>	Other	Total
Number of employees	1,263	292	215	57	43	16	24	1,910
By contract type								
Permanent employees	1,217	292	213	57	43	16	23	1,861
Temporary employees	1	0	0	0	0	0	0	1
Non-guaranteed hours	45	0	2	0	0	0	1	48
Workers who are not employees	78	115	3	98	4	3	70	371

<sup>1.</sup> Employee numbers are reported in headcount at the end of the reporting period, as of 30th June 2025, and are an aggregate of all Amotiv businesses and regions.

Asian region excluding Thailand - Predominately employees based in China and South Korea.
 Europe including the United Kingdom.

# **Supply Chains**

Amotiv Group works with international supply chain partners to procure a broad range of products, materials and services. We aim to build long-term relationships and work with those suppliers who demonstrate a commitment to implementing policies and practices consistent with Amotiv values and policies. The Group's supply chains includes over 1,450 suppliers across 34 countries comprising the following goods and services categories:

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

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

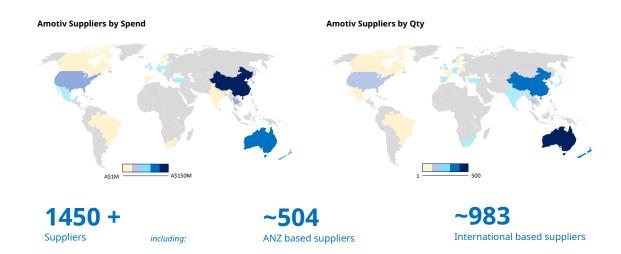
- · Materials: Raw material inputs for manufacturing (e.g. Steel and Aluminium plate, tube, sections and extrusions)
- Components: Inputs to manufacturing, assembly or kitting operations (e.g. Fasteners, castings, brackets, and wiring)
- Finished Goods: Outsourced manufacture and sourcing of group branded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

#### **Services**

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

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

These Goods and Services are sourced from a number of jurisdictions across the world, where our suppliers and our operations are located. While a substantial amount of our first-tier suppliers are based in Australia and New Zealand, a majority are located overseas, predominantly concentrated in Asia, as shown in the map below.



# 5. Risks of Modern Slavery

### **Assessment of Modern Slavery Risk**

During FY25 the Group continued to undertake risk-scoping activities to assess areas of its operations and supply chains that may involve higher modern slavery risk.

The Group assesses modern slavery risk using:

- Analysis of modern slavery risk factors in Amotiv operations and in its supply chain
- Supply chain risk mapping of all product suppliers
- Supplier assessment questionnaires, audits and on-site inspections
- Grievance mechanisms and reporting

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

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

# **Modern slavery risk in Amotiv Operations**

The Amotiv Group of businesses directly employ 1,910 people across our global operations with an additional indirect workforce of 371 people (e.g. labour-hire and contractors) supporting our manufacturing and distribution operations.

The Group has growing numbers of employees in our global operations, including in UK, USA, Sweden, South Africa, Thailand, South Korea and China (where there are, in aggregate, 432 employees as at the end of FY25). In some of these jurisdictions there are inherently higher risks of modern slavery or of other practices which indicate modern slavery. Nevertheless our workforce remains predominantly located in Australia (1,263) and New Zealand (215), which are assessed as having low likelihood of modern slavery.

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

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

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

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

Other than the 371 people in the External Labour-hire/contractor category above, the Group's workforce is directly employed by Amotiv businesses, such that they have control over the recruitment practices and employment practices (including contracts, terms and conditions). This control substantially reduces risk of modern slavery in the Group's operations.

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

### **Modern slavery risk in Amotiv Supply Chains**

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

Amotiv groups organisations in its supply chain into the following Tiers:

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

Evaluating the risk of modern slavery in Amotiv's supply chain is the first step to executing our Program, and is conducted using frameworks that leverage indicators to measure and classify supplier risk categories. These include:

- Amotiv's Modern Slavery Risk Framework: this determines the inherent modern slavery risk rating of countries by weighing a range of factors sourced from independent sources, detailed in the table below.
- Annual supply chain risk mapping: this involves the application of Amotiv's Risk Matrix by measuring supplier spend and other factors in respect of Tier 1 suppliers of goods.

#### Geographic risk assessment

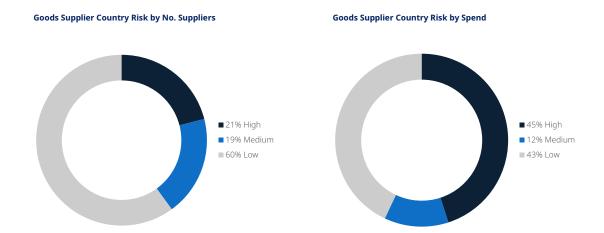
#### **Amotiv Modern Slavery Risk Framework**

Amotiv's modern slavery risk management framework uses a risk-based approach that considers both the inherent risks present in a supplier's operating jurisdiction and the specific risks associated with their sector and activities. As the Program continues to mature, this approach was strengthened in FY25 by incorporating the Sedex Risk Radar tool in addition to mapping suppliers by country, to understand broad modern slavery risk exposure. The Sedex Risk Radar is an independent, globally recognised tool that consolidates multiple human rights, labour, environmental and governance indicators to provide a more comprehensive view of supplier risk.

This approach incorporates geographical risk data, sectoral risks and known human rights indicators such as forced labour, working hours, child labour, discrimination, wages and freedom of association. This combined assessment uses information from international sources, including the ILO, UNDP, ITUC, Walk Free Foundation and other reputable human rights bodies. The output of the tool aligns with the four SMETA pillars - Labour Standards, Health & Safety, Environment and Business Ethics - and generates a consistent risk score for each supplier. These scores support our broader risk framework by helping identify higher-risk suppliers and informing the level of due diligence required through our Sustainable Sourcing Program.

Topic	Indicator	Indictaor Description	Source
Forced Labour	Forced Labour Index	The score represents the risk of forced labour in a given country based on a composite of indicators related to rule of law, poverty, informality, anti-trafficking regulation, treatment of minor leaderships and risks to migrants.	Ergon Associates (2022)
Freedom of Association and Collective Bargaining	ITUC Global Rights Index	The ITUC documents violations of internationally recognised collective labour rights by governments and employers.	The International Trade Unio Confederation (ITUC) (2022)
Gender	Global Gender Gap: Economic Participation and Opportunity	Measures gender-based disparities in labour market outcomes, tracking gaps between men and women in terms of: labour force participation, wage equality, estimated earned income, advancement to leadership roles, and professional and technical roles.	·
Discrimination	Group Grievance	Focuses on divisions and schisms between different groups in society, particularly divisions based on social or political characteristics, and their role	. ,

The FY25 supply chain mapping exercise assessed that the risk of suppliers representing approximately 45% of goods procurement expenditure were based in countries with an inherently high risk of modern slavery (in particular China and Thailand). Some of the inherent modern slavery risks associated with China includes the high prevalence of forced labour and the vulnerability of migrant workers and minority groups due to discriminatory practices.



#### **Industry and Product Risk Overlay**

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

Of the goods procured across the Group, there is recognition that, in particular, modern slavery risks exist around solar panels (or more particularly, the materials used in their manufacture). The raw material supply chain in relation to the manufacture of solar panels has been linked to use of state-enforced forced labour of workers from Uyghur, Turkic and other Muslim groups in the processing of poly-silicon for solar panels in Xinjiang, China<sup>1</sup>.

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

### Services

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

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

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

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

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

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

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

# 6. Actions to Assess and Address **Modern Slavery Risk**

# Material Modern Slavery Supply Chain Risks<sup>1</sup> & Amotiv's Risk **Management Actions**

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

# **Asia Sourcing Office**

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

Since its establishment within the Amotiv Group, the ASO has enhanced the number, standard and consistency of audits conducted across the Group under the Program. The conduct of human rights audits on behalf of Group businesses was one of the reasons for the establishment of the ASO and reflects the Group's commitment to managing modern slavery (and other ethical sourcing risks). The ASO helped fulfill the actions the Group is taking to address modern slavery risks through the Program during FY25:

- the ASO followed up supplier assessments on behalf of Amotiv businesses;
- the ASO reviewed and improved the sustainable sourcing audit tool used by the Group so that it more closely aligns with SMETA (Sedex's audit tool);
- the ASO completed 14 on-site supplier audits in Asia, fostering closer collaboration with our supplier base and reinforcing our commitment to responsible sourcing.

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

# **Sustainable Sourcing Program**

In FY25, Amotiv implemented a new enhanced risk-based prioritisation framework to segment the Group's trade product suppliers. This revised approach results in categorisation of suppliers based on assessment against predetermined due diligence requirements, placing greater emphasis on suppliers with higher risk profiles and those with whom the Group has higher levels of expenditure.

#### Prioritising High-Risk and High-leverage 'Trade Product' suppliers

Suppliers are classified based on the inherent risks related to labour standards, health and safety, environmental management, and business ethics in their countries of operation, in conjunction with the Group's spend with each supplier. While due diligence is applied to all suppliers, those identified as higher risk are assigned 'Specialised' or 'Priority' levels of due diligence and subject to more rigorous scrutiny, including on-site assurance audits, and tracking implementation of corrective action and improvement plans. As of FY25, 27 suppliers were assigned 'Specialised' due diligence and 91 'Priority' due diligence, reflecting the Group's ongoing efforts to uphold high standards across our supply chain. This shift in focus to strategically directing due diligence activity at higher-risk suppliers is reflected in the reported number and percentages of suppliers assessed being lower than previous years.

# **Our Operations**

#### **Direct Employees**

Direct employment of workers

### **Indirect Workforce**

Labour hire agency workers in our operations

### **Our Supply Chain**

#### **Trade Products**

Goods for manufacture or resale

Key category examples incl	ude:
Finished goods Filters, lighting, gaskets, etc.	<b>Components</b> Fasteners, castings, brackets, wiring etc.
Materials Steel, aluminium, extrusions, tubing, rolled sections	Vendor Branded Vendor-branded products for retail and distribution

#### Non-Trade Products and Services

Good and services to support operations

Key category examples include:

Facilities Management	Transport and Logistics
Cleaning, maintenance, electrical, grounds maintenance etc.	Freight, warehousing, distribution and courier services etc.
Consumables	Business supplies

#### Tier 2+ Suppliers

Products and services used by suppliers in the entity's supply chains

In FY26, the Program metrics and targets will be reset to align with the new approach.

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

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

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

Set out below is a table which maps our processes against these elements.

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

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

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

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

### **Prevention and Assurance (Due diligence)**

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

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

#### Supplier assessment

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

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

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

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

#### Commitments to Code Compliance and contractual terms

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

The Sustainable Sourcing Working Group provides many resources to support the prevention and assurance activities of the Amotiv businesses, including template clauses for use with suppliers to secure their contractual commitment to the Code compliance, and supplier co-operation activities.

#### **Audits and Site Visits**

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

Over FY24 and FY25 (2-year cycle), there were 89 site-based audits or visits, representing 33% of annual supplier spend. These included:

- audits against the Amotiv SAQ by Amotiv team members (including the ASO)
- · audits conducted against the Sedex Members Ethical Trade Audit (SMETA) standards' by accredited SMETA auditors
- audits against equivalent schemes by third parties

In FY25, the ASO completed 14 on-site supplier audits, fostering closer collaboration with our supplier base and reinforcing our commitment to responsible sourcing. These human rights audits cover modern slavery practices as well as a range of other potential unethical practices.

### Remediation

Through our Program, Amotiv businesses work with suppliers to require them to remediate identified human rights noncompliances, including modern slavery practices or indicators of modern slavery risk if they are identified. Audits identify any non-compliances and corrective actions which may be required. SMETA audits provide insightful detail of non-compliances and visibility to allow monitoring of corrective actions.

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

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

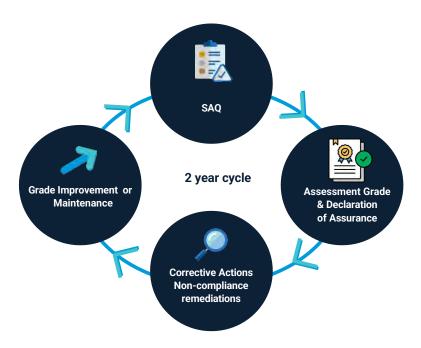
- provide guidance on international benchmarking standards
- agree on clear, measurable and time-framed corrective action items

Several non-compliances were identified during FY25 under our Program and became the subject of corrective action plans. However supplier non-compliances were predominantly related to health and safety, working hours and wages - not instances of modern slavery practices.

If a supplier refuses to complete remediation actions within agreed time-frames and Amotiv develops the view that the supplier is unwilling or unable to resolve a material modern slavery issue, then Amotiv would consider transitioning away from the supplier. This is considered a last resort but has been actioned historically. During FY25 there were no suppliers terminated for this reason.

### Monitoring

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



### **Supplier Site Visits**

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

With the expanded capability of the ASO to support Amotiv businesses in executing activities under the Program, the opportunity for site visits has increased. This provides an important monitoring mechanism for Amotiv businesses and increases visibility of supplier practices, materially enhancing the Program.

#### **Grievance Mechanisms**

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

In FY25 there were no whistleblower disclosures relating to modern slavery.

# **Mitigation**

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

#### **Training**

During the year, human rights related training, including training relating to modern slavery, was provided to various relevant Amotiv team members, and included Sedex seminars on Sedex SAQs, SMETA Audits, practical on-boarding guidance and topical issues associated with modern slavery and ethical sourcing management.

#### **Capacity Building**

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

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

In FY25, Amotiv businesses reported across the Group that approximately 50% of their goods supplier relationships exceeded 5 years. For some businesses, over 70% of supplier relationships exceeded 10 years. In Amotiv's view, the collaboration and alignment of goals with long term suppliers provides a particularly solid basis for partnering to achieve the goals of the Program.

#### Collaboration

Modern slavery is a global issue, and Amotiv recognises that effective mitigation often requires collaboration with downstream as well as upstream stakeholders. Close engagement and collaboration with our suppliers continues to be enhanced with the support of the ASO. This progressively delivers greater transparency and improved trust with suppliers, and accordingly better modern slavery risk management, over the medium to long term.

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

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

# 7. Effectiveness of our Actions

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

Program Activity (and measure)	Status
Annual Supply Chain Risk Mapping of tier 1 trade product suppliers	Completed annual supply chain mapping for FY25. Improved analysis to identify common suppliers to multiple businesses intra-Group transactions.
Engage suppliers in the Program (prioritised by risk and spend)  Number of suppliers engaged  modes of supplier spend engaged	Supplier engagement in the Program included over 883 suppliers by the end of FY25. Modern Slavery supplier assessments have now been completed for suppliers classified as high risk, representing approximately 93% of tier 1 of the Group's spend on goods purchases.
Number complete and % of supplier spend covered	As at the end of FY25, 89 supplier sites had been validated by audits¹ over a two year cycle. These suppliers represent 34% of the Group's goods procurement spend at the end of FY25.
Suppliers meeting base level Amotiv assessment criteria	Suppliers representing 90% of the Group's Tier 1 goods procurement spend as at 30 June 2025 had been assessed over a 2 year rotation at basic level or above <sup>2</sup> .
Supplier Non-compliances  Number of reported modern slavery non-compliances	There were no reported supplier non-compliances constituting modern slavery during FY25.
Speak Up (Whistleblower) Policy  • Disclosures relating to modern slavery	During FY25 there were no modern slavery related incidents reported through the whistleblower hotline or under the Speak-Up (Whistleblower) Policy.
Independent assessment platform onboarding for suppliers  • % of suppliers (by spend) on Sedex or an equivalent platform	Supplier uptake of Sedex and equivalent schemes continued and at the end of FY25, suppliers representing 31% of goods` procurement expenditure were using one of these platforms.
Policy, Process and Tools  User feedback	The Sustainable Sourcing Working Group met regularly during FY25 to highlight implementation issues, taking a continuous improvement approach to the tools used to implement the Program. The Code and Policy were updated in FY25.

- 1. This includes audit visits by third party auditors, Amotiv team members and the Asia Sourcing Office.
- 2. As set out in the Group's 2025 Sustainability Review, which can be found starting at page 25 of Amotiv's 2025 Annual Report.

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

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

The Board intends to review the overall ESG Strategy in FY26 and will consider the goals of the Program to ensure that momentum and efficiency remain appropriate for the Amotiv Group, its strategy and its stakeholders.

# 8. Consultation

This joint Modern Slavery Statement was developed by Amotiv in consultation with its wholly owned Australian subsidiary companies, including those which are reporting entities under the Act having a consolidated revenue of at least \$100 million for the reporting period, being: AutoPacific Australia Pty Ltd, Brown & Watson International Pty Ltd and Ryco Group Ltd.

Amotiv's Program to assess and address modern slavery risk is described in Section 6 of this Statement, and is implemented throughout the Group by the governance systems described in Section 2. The Program includes shared policies, protocols and systems designed to meet the reporting criteria, and which are applicable to each of the reporting entities.

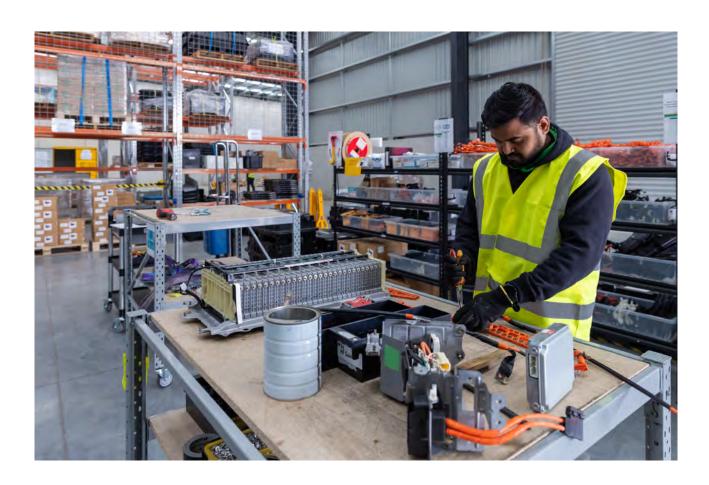
The development of the Statement is the culmination of the active engagement and information sharing by the Amotiv reporting entities:

- in regular Supplier and Quality Council meetings (which includes representatives from all the reporting entities as well as the ASO) to review the Program, assess implementation challenges and share insights and data on supplier engagement on modern slavery issues;
- · through assessments undertaken by each reporting entity and other Amotiv subsidiaries using the online Sedex platform; and
- via centralised data collection from the reporting entities on progress against Group targets, supply chain mapping and identification of supply chain risk and due diligence activity

The Statement content is derived from the above information and is formally reviewed and endorsed by:

- Key members of the Executive Leadership Team, including the Managing Director & Chief Executive Officer, the Chief Risk & Sustainability Officer, the General Counsel & Company Secretary;
- The convener of the Quality and Supplier Council and Sustainable Souring Working Group; and
- The Group Sustainability Coordinator

Importantly, the Statement has been reviewed and approved by the Amotiv Board's Risk, Safety and Sustainability Committee.



# 9. Other Information

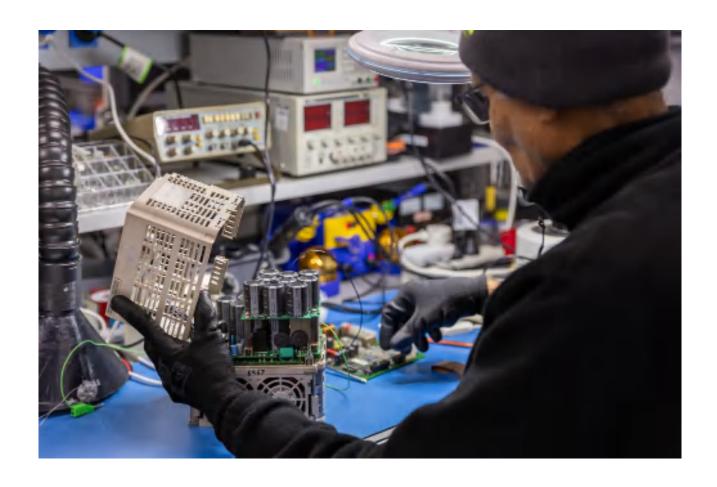
Amotiv understands per the United Nations Guiding Principles (UNGP) on Business and Human Rights, that there is a risk that businesses can be unwittingly linked to modern slavery practices through their actions or omissions. Amotiv accepts its responsibility to respect human rights and understands the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

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

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

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

<sup>1.</sup> The Code is available on Amotiv's website under the Corporate Governance tab.



# **Principal Governing Body Approval**

This Modern Slavery Statement was approved by the Board of Amotiv Limited, being the principal governing body of the reporting entities listed in section 1 above on 11 December 2025 and is signed by a responsible member<sup>2</sup> of Amotiv Limited.



#### **David Coolidge**

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

<sup>1.</sup> Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity, or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph — a prescribed body within the entity, or a prescribed

Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee — that trustee; or (c) if the entity is a corporation sole — the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001 — the administrator.



# **Amotiv Limited**

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