



Modern Slavery Statement 2022



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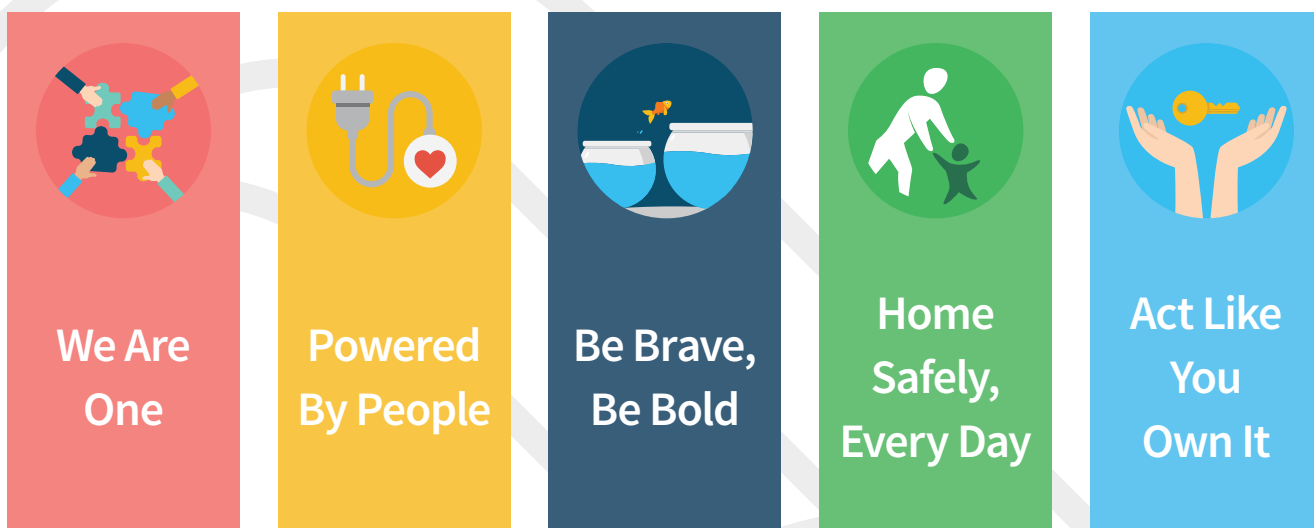
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Introduction

LINX Cargo Care Group acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past and present.

We continue to reaffirm our strong commitment and values of respecting human rights and the eradication of modern slavery. In line with LINX CCG's values, in this third submission of our Modern Slavery Statement, our position remains clear, and we reject any form of slavery. We have implemented a risk-based due diligence framework to assess where we may cause or contribute to adverse human rights impact to people in our supply chain. And we have again broadened the scope of vendors we review within the due diligence process to ensure an ongoing continuous improvement approach.

Our values



In our business practices, we strive to apply our values and business principles which reflects our continued commitment to not use forced, compulsory, trafficked or child labour within our Group.

We are committed to conducting our business in an ethical and responsible manner and endeavour to carry out our activities in a way that respects and supports human rights, including but not limited to:

- the prohibition of child and forced labour;
- the elimination of discrimination in employment;
- operating in a manner that supports the goal of zero safety incidents; and
- the eradication of harassment and physical or mental abuse in the workplace.

We strive to embed these standards across all our business units and operations, extending to training, communications, tender activities, and contractual agreements.

This statement has been prepared by LINX Cargo Care Group (**LINX CCG, the Group, we, us** or **our**) pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) in respect of the risks of modern slavery in our operations and supply chains and the actions we have taken during the financial year ending 31 December 2022 (**FY22**).

This statement covers the activities of LINX CCG including all our wholly owned and controlled subsidiaries within the Group.

In 2022, we continued to assess and address the risk of modern slavery across our workforce, operations and supply chains. Our existing policies and procedures, as described in our previous Modern Slavery Statement, are set out on page 9.

FY22 key highlights

Over the past few years, we have continued to enhance our approach to better understand and mitigate the potential for modern slavery risks in our supply chain by working more closely with key suppliers who may have a higher risk or exposure to ensure existing and emerging risks and issues are identified and addressed.

Our due diligence is an ongoing and iterative process of identification, prevention and mitigation that considers both actual and potential adverse human rights impacts through our activities and supplier and business relationships.



Annual review of tier 1 supply chain undertaken.



Developed a process and framework for the commencement of direct interviews with key suppliers focussing on their modern slavery supply chain risk and assessing their tier 2 supply chain focus. (Direct interviews commencing in FY23)



Further refined our in scope spend threshold levels across key higher risk modern slavery categories.



Further enhanced the effectiveness of our external risk screening software when renewing our agreement with the third-party provider.



Continued to incorporate contractual obligations incorporating modern slavery commitments wherever possible in key contracts.



Continued regular engagement with suppliers on the topic of modern slavery, through tender processing, contract negotiations, contract management meetings and vendor onboarding due diligence reviews.



New Zealand does not currently have legislation in relation to modern slavery reporting or due diligence, however as C3 Limited and Pedersen Group are a part of our operations, governance practices such as the inclusion of modern slavery clauses in contracts, purchase orders and tendering activity, were a focus of our New Zealand operations in FY22. New Zealand staff also participated in modern slavery training.

About LINX Cargo Care Group

LINX CCG is a diversified logistics provider, offering a range of services including rail and road haulage, warehousing, stevedoring, forestry related logistics services and finished vehicle processing, storage and transportation. The Group comprises five businesses LINX, Autocare Services, C3, Pedersen Group and GeelongPort (50% owned¹).

Our Group brings together the capabilities of five market-leading operations built on more than 100 years of ports and logistics experience. Together LINX, Autocare Services, C3, Pedersen Group and GeelongPort employ more than 3,000 people across Australia and New Zealand. LINX CCG is owned by a consortium of shareholders, with Brookfield Infrastructure Partners, the majority shareholder.

Our vision and mission

Our **Group's Vision** is

Delivering a connected supply chain, one move at a time.

Our Vision is the aspiration of what we want to achieve in the future, what our customers expect from us, and the role each of our people play to deliver integrated supply chain and logistics solutions.

The people at LINX CCG play an important role in delivering a connected supply chain for our customers, communities and themselves. A connected supply chain is what our customers and industry desire, to seamlessly and efficiently deliver goods and we achieve this together – one move at a time.

Our **Group's Mission** is

Safely working together to keep the supply chain moving for our customers and communities.

Our Mission is what we achieve every day – what we do and how we do it. There is nothing more important than our people going home safely, every day. Working together safely to deliver for our customers and communities is not negotiable.

¹ For the reporting period, GeelongPort was 50% owned by LINX CCG but controlled by a separately constituted board. Accordingly, it was not owned or controlled by LINX CCG.

Reporting entity structure

BAPSH Pty Ltd (**BAPSH**) is the principal governing body (as that term is defined in the Act) within the LINX CCG corporate structure whose primary activity is that of a holding company. BAPSH makes this statement for and on behalf of the reporting entities (as that term is defined in the Act) within LINX CCG². As a holding company, BAPSH does not manage supply chains or procure any goods or services.

For consultation purposes, the LINX CCG reporting entities have the same company secretary and there are some common directorships across reporting entities. This statement has been reviewed and approved by the directors of each reporting entity. In addition, all Australian wholly owned subsidiaries operate under the same modern slavery governance framework, delivered and managed through the corporate structure of LINX CCG.

Whilst only LINX Port Services Pty Ltd and Autocare Services Pty Ltd are reporting entities for which this statement is required in accordance with the Act, this statement sets out how we manage modern slavery risks across the whole of the LINX CCG.

Our operations and the risks of modern slavery in our operations

Our operational footprint includes more than 50 corporate and operational sites situated in the majority of Australia and New Zealand's capital cities, plus other regional areas. Despite Australia and New Zealand's lower relevance and vulnerability to modern slavery, the latest Global Slavery Index reports that there are still approximately 41,000 people in situations of slavery in Australia. This statistic reminds us that modern slavery is 'hidden in plain sight' and that no country is immune to slavery.

We have a workforce comprising a diversity of roles, ranging from office-based functions, skilled trades, through to those in our yards performing manual labour. A large part of LINX CCG frontline workforce is unionised with employment terms governed by Enterprise Agreements. During the reporting period, many of these agreements have been renewed and renegotiated. We comply with industrial relations laws and regulations wherever we operate and implement workplace policies to mitigate the risks of modern slavery within our operations.



LINX's combined capabilities across rail and transport logistics and stevedoring enable the provision of flexible, customer-focused supply chain solutions. LINX employs more than 1,000 people around Australia. LINX employs stevedores, truck drivers, tradespeople (e.g. mechanics, electricians), machinery operators (e.g. forklift), crane operators, warehouse operators, yards people, administrators, supervisors and managers.

² The reporting entities within the LINX CCG Autocare Services Pty Ltd, LINX Port Services Pty Ltd, LINX Care Group Holdings No.2 Pty Ltd and BAPSH Pty Ltd are each holding companies. The BAPSH Directors are not involved in the day-to-day operations of the businesses within the LINX Cargo Care Group.



Autocare Services is a national service provider in the automotive industry. Autocare operates off-wharf facilities and delivers IT solutions, transport, vehicle processing and storage services for vehicles nationally.

Autocare employs more than 430 people around Australia. Autocare Services employs truckdrivers, vehicle processors, planners, tradespeople, fleet builders, yards people, administrators, supervisors, and managers.



For more than 65 years, C3 Limited (**C3**) has been New Zealand's largest on-port services provider and has established operations in Australia specialising in forestry-aligned logistics. C3 New Zealand is a leading provider in product handling solutions, on wharf and beyond, working in partnership with exporters, importers and shipping lines across New Zealand and Australia.

C3's services include, log marshalling and log stevedoring, as well as general cargo handling, warehousing, container consolidation and transportation. C3 employs more than 1,420 employees across Australia and New Zealand. C3 employs truck drivers, machine operators, tradespeople (e.g. mechanics, fitters), log scalars, log marshallers, stevedores, yards people, administrators, supervisors and managers.



Pedersen Group is a market leading specialist provider of wood chipping, wood debarking and woodyard management services to pulp and paper mills, sawmill and forestry companies in New Zealand and Australia. Pederson employs more than 130 people across three operating sites, handling millions of tonnes of fibre annually. Pedersen Group employs machine operators (mobile plant and fixed plant), truck drivers, tradespeople (e.g. mechanics, fitters), log scalars, administrators, co-ordinators, supervisors and managers.



GeelongPort is Victoria's premier regional gateway and second largest port. It handles more than 600 vessel visits every year and in excess of 10.5 million tonnes of product annually.

GeelongPort is a major driver of Victoria's economy managing some \$7 billion of trade and generating over 1,800 jobs across the state. It is a 50/50 joint venture between LINX CCG and SAS Trustee Corporation. In 2022, GeelongPort was held for sale and for this transitional period, GeelongPort undertook their own due diligence and preparation for their own Modern Slavery governance processes. In April 2023, the sale of GeelongPort was finalised to a consortium comprising Spirit Super and Stonepeak Infrastructure Partners. GeelongPort employs engineers, tradespeople (e.g. electricians), maintenance workers, administrators and managers.

Our policies and procedures

The following policies and procedures continued to apply during the reporting period:



✓ LINX CCG Anti-Slavery and Human Rights Policy

This policy applies to anyone working on the Group's behalf in any capacity. We have a zero-tolerance approach to all forms of modern slavery within our business and supply chain.



✓ Code of Conduct and Business Ethics

Our *Code of Conduct and Business Ethics* applies to all officers, employees, and temporary workers. It clearly states our commitment to, and expectations of, conducting business in an ethical and responsible manner and prohibiting child and other forced labour.



✓ Procurement Policy and Processes

The *Procurement Policy* and Processes describe the approach for sourcing, exercising due diligence and monitoring new and existing suppliers with the intention of managing risks including modern slavery. It applies to all of our employees.



✓ Vendor Risk Management Framework

The procedures included in the Vendor Risk Management Framework provide the foundation for both the onboarding and ongoing monitoring of suppliers across multiple risk categories including, modern slavery.

In addition to the above, LINX CCG introduced a Whistleblower Policy in October 2022 which addresses how eligible persons can report certain matters, including illegal conduct such as modern slavery. Under the Policy, employees as well as anyone who supplies goods or services can make a report.

Copies of our key policies are available to download at www.linxcc.com.au.

Our supply chain and policy framework

Our suppliers are predominantly Australian and New Zealand based companies although some of the goods supplied originate from other countries. A small number of our suppliers are based outside of Australia and New Zealand and these suppliers are predominantly located in Europe, Asia and North America.

The LINX CCG procurement spend is distributed across approximately 4,300 (as of 2022) active vendors and a range of goods and services are sourced across multiple supply categories. Key categories include: fuel and lubricants, plant and vehicles, property repairs and maintenance, transport subcontracting, business services and consultants, electricity and utilities, and IT and telecoms. These are supply categories in common across the subsidiaries within the Group.

We have also assessed the potential for our business to cause, contribute to, or be directly linked to modern slavery via our supply chain. Given the nature of our procurement categories and practices as described in further detail below, it is unlikely that we have caused or contributed to modern slavery in our procurement of goods or services during the reporting period. There is, however, the latent risk that we may be connected to modern slavery practices through the activities of our suppliers and their supply chains.

The location of our suppliers based on their modern slavery questionnaire response is represented on the map below:



● Third Parties

LINX CCG high risk modern slavery categories

LINX CCG has undertaken a detailed review and determined the following as high modern slavery risk categories that will continue to be reviewed as per our modern slavery approach evolves:



Banking and corporate expenses



Equipment and assets: R&M – Tyres



Freight and courier charges



Transport sub-contracting



Fuel and lubricants



Human resources expenses including temporary labour hire



IT hardware and network infrastructure



Marketing, advertising, and promotional items



Meetings, conferencing, travel, and events



Office supplies and furniture



Operational consumables – including dunnage, packaging, and general consumables



Uniforms, personal protective equipment, and safety equipment



Property – new site development and upgrades and ongoing maintenance and repair costs



Facilities management, cleaning and janitorial



Security services

Progress on our commitments and actions for 2023

In 2022 LINX CCG continued to utilise a risk-based framework to assess, manage and mitigate modern slavery risks within our supply chain. This combines both internal and external platforms to undertake assessment on all suppliers to determine the appropriate course of action.

From a continuous improvement perspective in 2022, LINX CCG has updated key elements of this framework. Our approach again included lowering the thresholds of what constitutes a higher risk supplier to ensure greater coverage and analysis of all the risks.

We seek to assess the effectiveness of our actions by reference to the goals that we set each year and reporting on our progress against the goals.

Activity	2022 Action	Status	2023 Goals
Risk-based assessment conducted for all tier 1 suppliers.	Continued focus on categorisation and further refinement of risk-based approach.	Completed	Identify the longer-term suppliers that operate in higher risk sectors and seek to verify their compliance with modern slavery contractual obligations.
Risk-based assessment conducted for all tier 2 suppliers.	Continued efforts to understand our broader supply chain, focusing on tier 2 suppliers. Focussing on broader categories of risk and mapping through these suppliers Interview process and framework developed.	In progress	Interviews to commence and continue through 2023.
Enhancement of overall Modern Slavery risk assessment framework.	Continued refinement of the matrix and ongoing enhancement to ensure best practise in overall supply chain analysis.	Ongoing	Seek external advice from subject matter experts as to whether our risk assessment framework requires revision.

Activity	2022 Action	Status	2023 Goals
Addition of modern slavery clauses into new supply agreements.	Ongoing refinement and updating of clauses for higher risk supplier engagement as required.	Ongoing	Identify suppliers coming up for renewal and ascertain their compliance with the modern slavery terms prior to renewing contracts.
Sustainability Committee	Ongoing refinement and updating of the committee as required in relation to human rights issues that fall within ESG.	Completed. In the reporting period, we focussed on the ever changing Environmental, Social and Governance (ESG)/ sustainability landscape with a focus on human rights)	<p>Sustainability training for our Front-line leaders, which will include human rights.</p> <p>Discussion of LINX Modern Slavery risks and mitigation practices with Sustainability Committee.</p>
Annual Modern Slavery Training program for employees.	Training program to remain ongoing and built into all new employee onboarding requirements. Annual refresher training to also be conducted.	Ongoing. Training Rolled out.	Annual modern slavery training program to include specific procurement related training with a focus on modern slavery for key staff in both our Australian and New Zealand operations with the aim of further broadening the overall knowledge base and modern slavery awareness.

2022 key focus categories

LINX CCG continues to focus on a yearly basis on key risk categories and ensuring our approach remains tailored to both the changing requirements of the operations and addressing ongoing supply chain risks. In 2022, our focus across the Australian operations included the following key categories. Additional risk factors stem from the utilisation of short-term contracts and opaque subcontracting arrangements:



Repairs and Maintenance (R&M) –
Assets (Including Road Assets)



Site Cleaning and Janitorial Services



Security Services



Temporary Labour Hire

Repairs and Maintenance (R&M) – Assets (Including Road Assets)

With a diverse range of assets including road, forestry and wharf-based equipment, LINX CCG has an extensive portfolio of repairs and maintenance (R&M) requirements across these multiple industry sectors. One of the key aspects of such R&M remains labour utilisation. LINX CCG has been and will continue working with providers to ensure agreements are implemented that provide contractual commitments covering modern slavery requirements for any providers working on LINX CCG fleet.

Security Services

In late 2022, LINX CCG renewed its long-term existing agreement with one of the major security firms within Australia. As part of this renewal process, additional contractual requirements were included covering modern slavery considerations, as well as further process steps to ensure only accredited and qualified staff are engaged for these security services.

Site Cleaning and Janitorial Services

This category remains one of the highest areas of modern slavery risks within the LINX CCG supply chain. It operates with numerous suppliers to cover the geographic diversity of the LINX CCG operations. To manage this ongoing risk, LINX CCG continues to review and engage suppliers through detailed services agreements with contractual obligations for the supplier to ensure ongoing compliance with modern slavery legislation.

Temporary Labour Hire

LINX CCG has continued to work with its key labour hire providers and implemented approved supplier panels allowing for ongoing labour hire across the operations with a detailed modern slavery provision within those agreements. To manage this ongoing risk, LINX CCG is working towards ensuring every provider engaged is required to comply with contractual provisions in respect of modern slavery.

We periodically review and revise our procedures to improve our assessment approach to address, mitigate and prevent the risk of modern slavery occurring within our supply chain.



Tier 2 supply chain analysis

LINX CCG has continued to focus on suppliers operating in higher risk modern slavery categories and assessing their supply chains. Owing to the complexity and breath of the overall LINX CCG supply chain, the initial tier 2 focus was targeted at key suppliers covering categories deemed at the higher end of modern slavery risk.

In 2022, LINX CCG developed a process and framework for direct interviews with key suppliers within tier 2 key. The content of interview questions was finalised with the proposed interviews focussed on understanding suppliers' overall supply chain and the inherent risks within those, and in particular their approach to mitigating the risks.

A matrix of risk-based questions for the interviews was developed and include:

- Does your organisation have a Modern Slavery policy in place, and also publish annual statements (where required to do so)?
- Does your organisation already have a modern slavery management process in place to assess and address modern slavery risks?
- Who has ultimate responsibility for modern slavery management within your organisation?
- What are the main modern slavery risks within your business and supply chains? (Identify potential types of modern slavery hotspots in operations and supply chains and available tools.)
- How many suppliers and tiers of suppliers did the organisation directly check for modern slavery?
- What process is in place to provide remedy for victims where your organisation has caused or contributed to modern slavery?

These interviews commenced in early 2023 covering key categories including:

- Labour hire in both our Australian and NZ operations
- Security
- Stationery and office supplies
- Waste removal.

The outcomes and actions identified from these interviews will be detailed within LINX CCG's 2023 Modern Slavery Statement.

Employee tools for reporting modern slavery concerns

As part of the Modern Slavery Training Program all employees are trained on what to do if they encounter or suspect an instance of modern slavery either within the business or our supply chain. These include any of the following ways to report their concerns:

- to their immediate supervisor;
- to their relevant HR representative;
- to the LINX Procurement Team; or
- to any of the Senior Leadership Team.

Alternatively, LINX CCG has an anonymous Ethics Hotline which is available for LINX CCG employees, vendors and any other interested parties to anonymously report any matters relating to unethical business conduct or violations of laws including modern slavery. The Ethics Hotline is available toll-free, 24 hours a day, seven days a week and may be accessed by phone or by internet.

The Ethics Hotline is managed by an independent third party and allows anyone to call anonymously to report in English and other languages. Hotline details are included in Master Service Agreements and communicated to all our vendors.

We continue to monitor the reports made through our Ethics Hotlines and to the best of our knowledge we did not receive any reports of actual or suspected violations of our Human Rights Policy during the reporting period.

Effectiveness assessment

We continue to focus on evolving our approach to modern slavery to ensure that we are able to assess and address modern slavery risks within our operations and supply chains. As noted earlier in this statement, we seek to assess the effectiveness of our actions by tracking against the goals that we set each year to increase visibility in relation to our supply chain and test the robustness of our frameworks.

Additional ways that we continue to assess the effectiveness of our approach include:

- Ongoing engagement with key higher risk suppliers regarding compliance with our policies and processes.
- Ongoing reviews of our overall modern slavery program and controls, to address any new or emerging trends within the overall modern slavery risk framework.
- Ongoing engagement with internal stakeholders and departments including legal, insurance and risk, procurement, and the Senior Leadership Team.
- Further strengthening of supplier evaluation criteria around modern slavery risk and the embedding of additional modern slavery risk management tools within the tender process.
- Continued training of our employees to increase awareness of modern slavery red flags.
- Focus on the ever changing Environmental, Social and Governance (ESG) and sustainability landscape which was also the focus of discussions in our Sustainability Committee.

Our approach to due diligence is an ongoing and iterative process of identification, prevention and mitigation that considers both actual and potential adverse human rights impacts through our activities and supplier and business relationships.

How this statement was prepared

The preparation of this statement involved the engagement and input of the different teams within LINX Cargo Care Group from Legal, Procurement, Finance and Risk. The members of these teams are responsible for the reporting entities and each of their owned or controlled entities and as they are part of the Group Corporate Centre who have functional and governance oversight for each of these entities. This process constituted consultation of each of these entities. This statement was also presented to the Group Senior Leadership team.

This Modern Slavery Statement has been approved by the LINX CCG Chief Executive Officer and the Board of BAPSH in its capacity as the holding company of the reporting entities within LINX CCG.

Brett Grehan

LINX Cargo Care Group CEO



Jonathon Sellar

Chairman – BAPSH Pty Ltd

