



Modern Slavery Statement

December 2023



Reporting Entities & Consultation

This joint statement is in accordance with the Modern Slavery Act 2018 (*cth*) and has been prepared in consultation with the following entities:

- Black Diamond Administration Services Pty Ltd
- Yellow Diamond Administration Services Pty Ltd
- Fleets Flyers Pty Ltd
- Courier Metro Services Pty Ltd
- Contract Logistic Services Pty Ltd
- B2C Delivers Pty Ltd
- Courier National Services Pty Ltd
- Courier Contract Services Pty Ltd
- SDNT Pty Ltd

Introduction

This statement has been made by **Fleets Flyers Pty Limited** ABN 41 008 417 016 trading as ANC, in accordance with the [Modern Slavery Act 2018 \(cth\)](#). This is our third annual statement regarding modern slavery to fulfil our obligations in respect to the Modern Slavery Act 2018 (cth).



About ANC

ANC is the last mile delivery partner for many of Australia's leading brands. ANC is a privately-owned Australian company, our organisational structure consists of a Board of Directors, an executive leadership team, 200+ employees distributed nationally with a team of 1,000+ contracted delivery professionals across Australia and 50+ support staff in the Philippines.

ANC engages a fleet of 1000+ contractors with commercial vehicles servicing metropolitan Australia with utes, vans, Pantechs, tautliners, crane trucks, flat tops, semis and electric vehicles making 25,000+ deliveries a day, 7-days a week. On occasion, we engage contractors through what we call Outside Hire organisations. We also engage a team of personnel through third-party, Business Process Outsourcing (BPO) organisations in the Philippines, who perform customer service activities on behalf of ANC.

Our DNA of innovation, adaption and reinvention has helped us sustain and grow our business for over 100 years. We are a national business delivering outcomes in ever-expanding ways, taking on challenges to meet customer and consumer expectations, and supporting our delivery agents and people be successful.

We believe in being sustainable and green. We seek opportunities to not only minimise our carbon footprint but also to offer solutions that help our customers and consumers reduce theirs. We currently operate several electric vehicles and have a national strategy to move at scale in the implementation of zero emissions and sustainable delivery to customers.

Diversity is our key strength, and we actively seek people from all backgrounds to help build a future where everyone and everything can move successfully.

Our clients are the businesses we serve and contracted to provide last mile solutions to meet their business and customer objectives. Our customers are our clients' customers, and they are the people we seek to satisfy every day.



Our business is diverse, scalable, and Australia-wide



Large fleet, last mile focused



Commitment to sustainability



Diversity is our superpower



Rich history, national footprint



Our Purpose is to...

To unlock the full potential of a customer's purchase by fulfilling the delivery promise.



Last mile delivery for Clients with **mixed & complex freight** where value is created through **exceptional customer outcomes.**



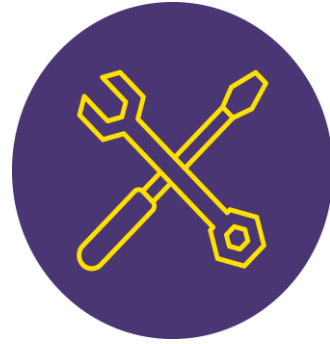
We help our Clients increase their sales, expand their customer base and grow their business by delivering exceptional outcomes for their **customers.**



Our Operations & Our Supply Chain



Delivery



**Install &
Assembly**



**Brand carry &
Promotion**



**Recycling &
Return Services**

ANC's supply chain involves working with a number of large Australian and global clients providing professional last mile delivery services into homes, offices and worksites including construction, corporate, medical and education facilities. As part of our integrated delivery service, we provide 'complex deliveries' such as installation, assembly and removal of old comparable goods.

Our supply chain relies on a team of contractor owner drivers (Delivery Professionals) who operate their own assets to safely complete the delivery services.

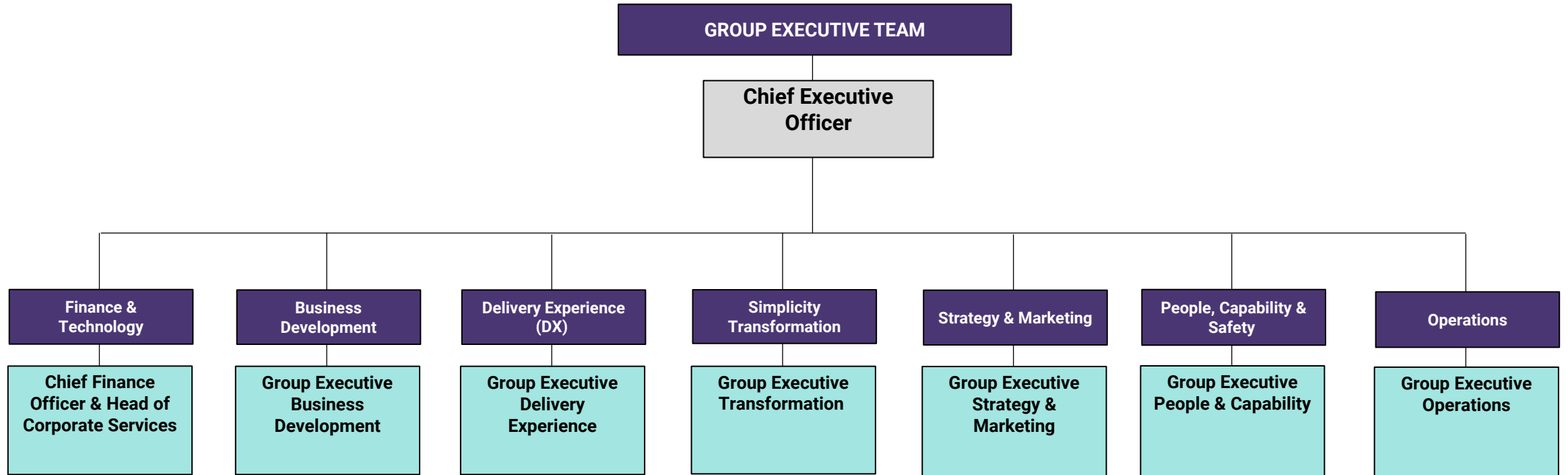
Our supply chain relies on integration and collaboration to ensure safe and seamless delivery outcomes. Throughout our supply chain ANC is committed to assessing and reducing all risks of modern slavery within our business and throughout our supply chain.

According to the **Global Slavery Index (2018)**, cases of forced labour exploitation in Australia predominantly occur in industries considered at risk, including agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food services.

Whilst ANC does not operate into these areas identified as high risk, we understand that there is still a possibility of modern slavery occurring within our supply chain and we must take appropriate actions to mitigate these risks.



Our Leadership Team



Principles propel our culture



Spark the change you want

Everyone is empowered to intervene, improve and simplify. Continuous improvement is a shared responsibility, action is an independent one.



Simplicity & technology sit at the centre

We know complexity is the enemy, so we build simple ways to work. Our technology reflects that simple way and helps us make great decisions. It is our tool of trade.



Own your decisions, own your results

Focus on results and make timely decisions to deliver them. Don't be afraid to stretch and occasionally make mistakes but commit to learning and moving forward at pace.



Exceptional people, exceptional teams

Work hard to find, hire, develop and support exceptional people, never settle. Play as a team and put what's right for the team first, because that's best for all of us.



Diversity makes us stronger

Diversity is our superpower, it is essential to our growth and creativity. We seek out diversity in ideas, identity, ethnicity and experience.



Focus on the customer and all else will follow

Clients and their customers are our lifeblood. Striving to meet the promise made to customer comes first, for everyone.



Our commitment to preventing Modern Slavery

Overview of modern slavery

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour

Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. These practices are also harmful and may be present in some situations of modern slavery.

Modern slavery can occur in every industry and sector and has severe consequences for victims. Entities have a responsibility to respect human rights in their operations and supply chains, as outlined in the [***United Nations Guiding Principles on Business and Human Rights***](#). This includes taking steps to assess and address modern slavery risks.

Entities that take action to combat modern slavery in their operations and supply chains can protect against possible business harm and improve the integrity and quality of their supply chains.

ANC's commitment to preventing modern slavery

Preventing modern slavery occurring within ANC is key to our commitment to social responsibility and sustainability. In accordance with the Modern Slavery Act 2018 (*cth*) ANC is committed to upholding the protection of human rights. We are committed to ensuring that we are not complicit in any human rights violations and hold our suppliers and partners to this same exacting standard.

This statement outlines the steps that ANC has taken, and will continue to take, to assess and reduce risks of modern slavery within our business and throughout our supply chain.



Preventing modern slavery occurring within ANC is key to our commitment to social responsibility and sustainability



Client	ANC
TO	BEN LIA 9 ROSE STREET LEAWOOD GARDENS SA
QTY	1
WGT	15kg
EXP	5150
DIMENSIONS	
EXP	1



Deliver

Corporate Governance

At ANC we have a number of policies that outline the ethical standards in which all employees, contractors and our clients are expected to operate, everything we do is measured against these important guides.

ANC is committed to the highest standards of conduct and ethical behaviour in all our business activities, and we promote and support a culture of honest and ethical behaviour, corporate compliance, and good corporate governance.

- ANC Modern Slavery Policy
- ANC Human Rights Policy
- ANC Code of Ethics Policy
- ANC Young Worker Employment Procedure
- Suspected Child Labour Violation Procedure and Handling Routine
- ANC Whistleblowing Policy
- Independent Contractor Code of Conduct
- Anti-Discrimination, Harassment and Bullying Policy
- ANC Sexual Harassment Policy

Reporting unlawful and unethical conduct

Reports of unlawful conduct are responded to in accordance with the **ANC Whistle-blower Policy**. To receive protection of any disclosure under this Policy an Eligible Person must make their disclosure to a Disclosing Officer. A discloser may also elect to make a report anonymously. ANC will respect the discloser's right to not identify themselves. This has also been included in our **Modern Slavery Policy**.

ANC encourages the disclosure of any instances of suspected unethical, illegal, fraudulent, or undesirable conduct involving ANC's business, and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage, or reprisal.





**ANC is committed
to the highest
standards of
conduct and
ethical behaviour
in all our business
activities**



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Identifying Potential Risks of Modern Slavery in our Supply Chain

Identified Potential Risks of Modern Slavery

Local / Domestic (Australia)	International
<ul style="list-style-type: none">• Delivery Professional, contractor workforce engaging the services of their employees which includes migrant workers.• Outsourced local logistics• Electrical vehicles purchased by our contractor fleet via partnered suppliers• Procurement of high-risk services (cleaning services)	<ul style="list-style-type: none">• Procurement of products from high-risk countries such as Uniforms.• Use of third-party labour companies to supply foreign labour from overseas.

We have conducted a risk assessment of modern slavery risks within our operations and supply chains.

Whilst we have implemented controls to reduce the risk of modern slavery, the risk assessment has identified our areas of potential risk (see table) which includes engagement of migrant workers through our contracting arrangements, outsourcing through local logistics companies, cleaning services, use of third-party labour companies to provide foreign labour, the electrical vehicles purchased by our contractor fleet via partnered suppliers and the procurement of uniforms from high-risk countries.



Addressing Modern Slavery Risks

- We have reviewed our existing supply chain using a risk assessment that considers the likelihood of a Human Rights breach (nature of the supplier business), and the level of business involvement (how much we utilise a particular supplier)
- We implemented the **ANC Modern Slavery Policy** endorsed by the Executive Leadership Team (ELT)
- We have provided Modern Slavery Awareness training by educating our senior leaders to ensure that they are equipped with the knowledge and understanding of what constitutes modern slavery and the reporting process of any suspected breaches of the ANC Modern Slavery Policy.
- We have conducted an annual review of our broader company policies to ensure that they align with the Modern Slavery Act 2018 (cth).
- We have established an ANC Modern Slavery Working Group
- The ANC Modern Slavery Working Group have continued to meet to address our actions.
- We have introduced appropriate steps to confirm awareness and alignment of new suppliers to our commitment against modern slavery globally by conducting a review of if our “priority” suppliers have a Modern Slavery Statement.
- We have presented progress on actions and outcomes to the Executive Leadership Team for review with updates provided in our Modern Slavery Statement.
- We have the **ANC Young Worker Employment Procedure** for any workers under the age of 18 years old. Young workers are considered ‘vulnerable’ workers, and may pose a higher risk, therefore this procedure ensures that young workers understand the following;
 - They must be paid in accordance with the relevant award
 - They must be provided with suitable working conditions
 - They are aware of ANC’s policies and procedures
 - They are aware of the minimum entitlements under the relevant award such as penalties, and leave entitlements
 - Young Workers are also assigned with a key contact within the business should they have any questions relating to their pay, entitlements or working conditions
- We also have a **Suspected Child Labour Violation Procedure and Handling Routine** to outline the complaints handling process should we receive a complaint in relation to the **ANC Young Worker Employment Procedure**
- We have trained members of our sourcing team on the **ANC Young Worker Employment Procedure**.



Addressing Modern Slavery Risks

- We have reviewed our Independent Contractor Agreements to include the requirement to comply with the modern slavery legislation.
- We instituted a reporting process for breaches of modern slavery utilising the **ANC Whistle-blowing Policy**.
- ANC have continued to conduct periodic annual reviews of our broader company policies to ensure that they continue to align with the Modern Slavery Act 2018 (cth).
- We have continued to educate our people, in office and in field, to ensure that they are equipped with the knowledge and understanding of what constitutes modern slavery and the reporting process of any suspected breaches of the ANC Modern Slavery Policy.
- We have reviewed relevant suppliers and their commitment against modern slavery globally by conducting a review of priority suppliers to determine if they have a Modern Slavery Statement.
- We have introduced a **modern slavery supplier questionnaire** and issued to priority suppliers that do not currently have a modern slavery statement.
- We have taken the opportunity to update relevant supplier contracts to include their commitments to mitigate and address modern slavery within their own business and their supply chains.



Assessing the effectiveness of our actions

- Our Modern Slavery Working Group is fundamental in ensuring effectiveness of our actions in line with our modern slavery commitment.
- Our Modern Slavery working Group allows focused planning and mutual accountability. For example, sharing information on a quarterly basis on our progress. We also discuss our actions, and our proactive measures are approved by the group.
- Our Modern Slavery Working Group will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions, outcomes, and undertaking regular internal governance processes.
- Modern Slavery has been included in our Enterprise Risk Register.
- Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.
- We have regularly briefed relevant leaders and executives and reported on relevant actions with updates provided in subsequent Modern Slavery Statements.



What we will continue to do to address Modern Slavery

The Modern Slavery Working Group will continue to meet and address our actions, priorities, tracking progress and effectiveness

We will continue to reinforce and embed mitigation of modern slavery risks within the contractor fleet

We will continue to conduct specialised education awareness sessions on modern slavery

We will conduct our modern slavery risk assessment as part of our new supplier prequalification process

We will continue to work with our potential risk suppliers to assess whether their modern slavery risk controls are adequate

We will continue to conduct an annual review of relevant company policies in line with the Modern Slavery Act 2018



This Modern Slavery Statement is made by ANC and has been approved by the Board of Directors.



Joe Sofra
Chief Executive Officer

22 December 2023
Date



James Taylor
Director

22 December 2023
Date



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