

ACA INTERNATIONAL Pty Ltd

Modern Slavery Statement 2021



This is the first Modern Slavery Statement for ACA International Pty Ltd (**ABN 94 056 550 700**) and relates to the financial year ending 30th June 2021. The Statement has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

ACA International Pty Ltd is an international logistics and supply chain management specialist with a very clear mission to provide totally managed international transport and warehousing solutions tailored to meet customer needs.

We are recognised as one of the region's leading privately owned providers of integrated international logistics. Established in 1982, the organisation, its people and partners relentlessly pursue efficiencies and seek to be at the forefront of today's electronic business-to-business data initiatives.

Our Business Operations

ACA International Pty Ltd (**ABN 94 056 550 700**) is a privately owned company with its Head Office based in Melbourne, Australia while operating satellite offices in New Zealand, Hong Kong, China, Taiwan and USA.

ACA International Pty Ltd specialise in Freight transportation, Vendor Management, Logistics and Information services and in addition to its direct operations, have established an extensive agency network of over 100 offices located in more than 60 countries globally as shown in figure 1 below:



Figure 1 - Red shaded countries depict Countries of operations including agency network office)

ACA International Pty Ltd employ 133 global employees directly and use a number of Sub-Contractors across our global operations.

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Of the total number of employees directly employed by ACA International Pty Ltd, 70% are employed full time and 30% are employed in a part time capacity to meet business requirements on a daily basis.

Our business operates to act as a Freight Forwarder where freight is delivered to our consolidation hubs across our network of operations globally and then shipped to the destination ports as required.

Once freight arrives locally in Australia, we also manage the import and delivery of freight to our customers.

Describing Modern Slavery Risk

At ACA International Pty Ltd, we have defined Modern Slavery as a term that is used to cover any exploitative practice where freedom is taken away by threats, violence, coercion, abuse of power or deception. These practices include human trafficking, slavery, forced labour, worst forms of child labour and any other slavery-like practice.

Our definition extends to Forced and Compulsory Labour which we define as any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily.

As ACA International Pty Ltd.'s main operations occur in Australia and while we do recognise Modern Slavery occurs in Australia, we believe our geographic location presents a low risk to our business. As our operations extend globally, we realise this expands the risk of Modern Slavery in our business operations due to various factors including vulnerable workers affected through practices such as employment status (casual/on-call, part-time), cross border workers, migrants, low skill labour force and low wage economies.

We also recognise our industry type has a greater risk of being involved in Human Trafficking both directly and indirectly through freight movement.

Through our agency network of operators globally who operate at arms-length to our business, employing and managing workers directly, we recognise ACA International Pty Ltd may also be linked to Modern Slavery risk through this business model. We see these types of employment arrangements as one of the greatest risks of Modern Slavery (or Forced and Compulsory Labour) in our business operations.

ACA International Pty Ltd strictly prohibits all types of Modern Slavery including Forced or compulsory labour across our entire business operations including our Agency network.

Our Actions

As we became more aware of our obligations under the Modern Slavery Act, we engaged industry experts to guide us on our approach to increasing our knowledge of Modern Slavery risk and where and how our business operations may be affected.

Our initial step was to define what Modern Slavery and forced/Compulsory labour means to ACA International Pty Ltd and to also develop our business Modern Slavery Policy.

We recognised we needed to improve our understanding of Modern Slavery risk so commenced working on a Modern Slavery Risk Assessment of our entire business operations. We are currently working through our Modern Slavery Risk Assessment findings to help us further identify Modern Slavery risk factors such as:

- People/Workers in our operations/supply chain

- Our Industry category risk
- Geographical risk

ACA International Pty Ltd have implemented employment agreements with each employee directly employed in Australia, USA and NZ and implemented our “Standards of Behaviour” Policy which governs the behaviour of our direct employees while working for ACA International Pty Ltd. These behaviours include specific activities which ACA International Pty Ltd prohibit as they may be a cause of Modern Slavery and Forced or Compulsory Labour. **ACA International Pty Ltd strictly prohibit these behaviours.**

In selected markets, we require our Sub-Contractors to sign a contractor’s agreement. We recognise this requirement needs to extend to other markets, so we are investigating how we extend the contractors agreement across other regions such as Asia.

ACA International Pty Ltd direct employees have also all signed an employment contract which details their employment obligations and rights, their remuneration and the working hours and conditions of their role.

We have implemented a process of remediation rather than termination of our direct work force. Where an employment breach occurs, we investigate the circumstances and cause of the breach, consider if any disciplinary action is required, provide support to the worker and implement remediation steps as required. **At all times, our workers are our primary concern.**

While we have commenced our journey to mitigate Modern Slavery risk in our business operations, we know we have a lot more work to do. Over the coming year, we have committed to undergo the following:

- Implement a training program for our direct employees on what Modern Slavery means and how to identify it
- Implement an annual review process of our “Standards of Behaviour” Policy to ensure the Policy remains in line with current industry expectations

Assessing our Actions

Identifying the effectiveness of our actions to mitigate Modern Slavery and Forced Labour in our entire supply chain is something we need to develop further in, including to identify tools that we can use to assist us in this area. Today, ACA International Pty Ltd have not discovered or identified any cases of Modern Slavery (or Forced/Compulsory Labour) in its entire business operations.

We do understand this does not mean Modern Slavery does not exist in business operations however we are committed to further develop in this area to ensure we have the right tools in place to assess the effectiveness of the steps we are taking to identify Modern Slavery while implementing further improvements as we identify potential issues.

Consultation

As a single operating entity, our Directors and Senior Management team are involved and consult regularly on operational processes and safety measures to combat the risk of Modern Slavery in our business operations.

Other Information

ACA International Pty Ltd have continued to operate through the COVID pandemic. Through this period, we have implemented and maintained COVID safe protocols to protect both our workers and those that they come in contact with through their workplace operations.

To ensure our workers were protected, we followed all State and Federal guidelines on infection control and provided all required PPE to our employees to protect their health and employment. In addition, we established an internal "COVID Policy" and a "COVID Safe Plan" which provides guidance on our expectations of employees to ensure a COVID safe office environment. We also established an internal COVID committee to assist in dealing with COVID related matters on returning to the office environment.

ACA International Pty Ltd have expectations with our service providers on how they handle COVID safety and protecting their workers. To support this expectation, we prepared and circulated a COVID-19 Response Plan to our transport providers detailing the requirements for precautionary protocols and dealing with any COVID incident response.

Finally, we ensured all workers in our business continued to be paid their legal entitlements during any lockdown periods. We know the COVID pandemic will continue to be a challenge to everyone over the coming years as we continue to work in a COVID safe way to protect all those who work in our end-to-end supply chain.

Business Approval

This Statement was approved by the Board of Directors of ACA International Pty Ltd on 31st March 2022.



Adam Cruttenden
Managing Director

ACA International Pty Ltd
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