



MODERN SLAVERY STATEMENT

1. Purpose

This Statement is made under the Australian Modern Slavery Act 2018 (Cth) ("Act") for the financial year ending 31 May 2024 ("FY24") and is published on behalf of Ravensdown Shipping Services Pty Ltd ("RSS"): ABN 37 149 142 807, a privately owned company.

The Statement details the steps RSS has taken to assess modern slavery risks within its business and/or supply chains and practical steps to be taken to help minimise those risks. RSS is committed to maintaining high ethical standards in all of its business activities worldwide, providing a duty of care to its team, clients and stakeholders. RSS does not tolerate modern slavery, human trafficking or any other form of forced labour and is committed to addressing any potential risk of modern slavery in its operations and supply chain to the extent it can.

2. Background/Structure

RSS is an Australian Private company that is jointly owned and controlled by Ravensdown Australian Holdings Limited and Paladare Pty Ltd.

RSS is a Shipping Company domiciled in South Melbourne which commenced operations in February, 2011. It is the shipping arm for Ravensdown Limited (NZ) who imports to New Zealand some 800-900k mt of fertilisers per year. RSS's primary trade is in cargoes to New Zealand sourced from worldwide origins complemented typically by logs and other cargoes exported from New Zealand.

RSS has a team of 13 people led by a highly experienced Chartering team. Along with experienced Operational and Finance staff, RSS has continued to steadily and soundly grow their business base over the years.

3. RSS Operations and Supply Chain

The RSS network provides bulk freight services to global customers as a vessel operator, in several industries including:

- Vessel Chartering – establishing long term commitments with established vessel owners.
- Port Agency Services - outsourced to established service providers, including Stevedoring Services
- Marine Fuel Services – procured externally from registered fuel providers.

RSS believes it can minimise (with a view to eliminating) modern slavery risks from the supply chain by educating their team and supply chain providers, by applying consistent and enforceable standards of conduct. RSS includes modern slavery risks as part of its risk assessment framework for day-to-day operations.

RSS expect suppliers, contractors and consultants to follow RSS's high standards, including not to engage in any form of modern slavery and to adhere to relevant laws and regulations in the jurisdictions in which they operate.

RSS does not own or control any other entities.

4. Modern Slavery Risks:

Understanding the risks of modern slavery in the supply chain is a priority for RSS. The potential risks are most significant in the following categories;

- Vessel Chartering:
 - Whilst RSS does not employ seafarers directly, RSS acknowledges that modern slavery risks exist with the global maritime shipping industry due to the geographical remoteness of shipping and decreased visibility of working conditions.
- Port Agency Services.
- Marine Fuel Services.

RSS has relationships with external businesses globally and all of suppliers must comply with all relevant legislation and international standards as relevant to their industry.

5. Assessment of actions taken to address Modern Slavery Risks

During FY24, RSS has put in place the following measures:

- Introduced an Anti-Modern Slavery Policy,
- Revised internal policies
- Included a Modern Slavery section in the Risk review framework for Risk Committee meetings.

The following actions were completed across the supply chain:

- Vessel Chartering
RSS recognises the challenges of monitoring living and working conditions on chartered vessels to encourage meaningful human rights due diligence.

For the RSS chartered fleet, controls to manage human rights and modern slavery risks include:

- Inclusion of a Modern Slavery Clause in Charterparties (Contracts) with Vessel owners, which ensures owners have taken all necessary actions and investigations to warrant that there are no forced labour or slavery used anywhere within its business by any of their own direct suppliers.
 - RightShip vetted – To qualify for nomination, vessels must fulfil minimum safety criteria, including predefined RightShip safety scores for both the vessel and its operator.
 - No breeches of the Maritime Labour convention (MLC)
- Port Agency Services
 - Marine Fuel Services
- During FY24, RSS identified major suppliers within these categories of the supply chain and an initial review of these suppliers was performed to check that Modern Slavery Statements exist for all major suppliers.

6. Further actions to address Modern Slavery Risks:

RSS recognises that modern slavery can occur, and as such continues to consider it as part of RSS's risk management framework - which addresses risk across all areas of the business. RSS is committed to the ongoing improvement of their understanding and approach to managing potential exposures to modern slavery risk, such as through contractual mechanisms, due diligence, company policies, training and awareness, open engagement with RSS's stakeholders and ongoing risk analysis.

During FY25, RSS intends to commence a more in-depth key supplier review aimed at identifying potential modern slavery risks within these key stakeholders. At the date of this report, however, RSS is not aware of any modern slavery in its operations and supply chain.

RSS is committed to ensuring that modern slavery and human trafficking are not occurring within its operations and will continue to mitigate this risk. RSS is proud to be active participants in the global movement towards eradicating all forms of modern slavery. RSS is committed to maintaining and improving systems, processes and policies to effectively manage modern slavery risks.

This Statement was approved by the principal governing body of the reporting entity, RSS, namely the Board of Directors of Ravensdown Shipping Services Pty Ltd, by resolution on 06/03/ 2025.

This statement is signed by Maximilian Peter Hugh Langham in his role as director of Ravensdown Shipping Services Pty Ltd.


[Max Langham \(Mar 7, 2025 13:29 GMT+11\)](#)

Maximilian Peter Hugh Langham

Director of Ravensdown Shipping Services Pty Ltd