



TOT TRANSPORT MODERN SLAVERY STATEMENT

FY 2024-25



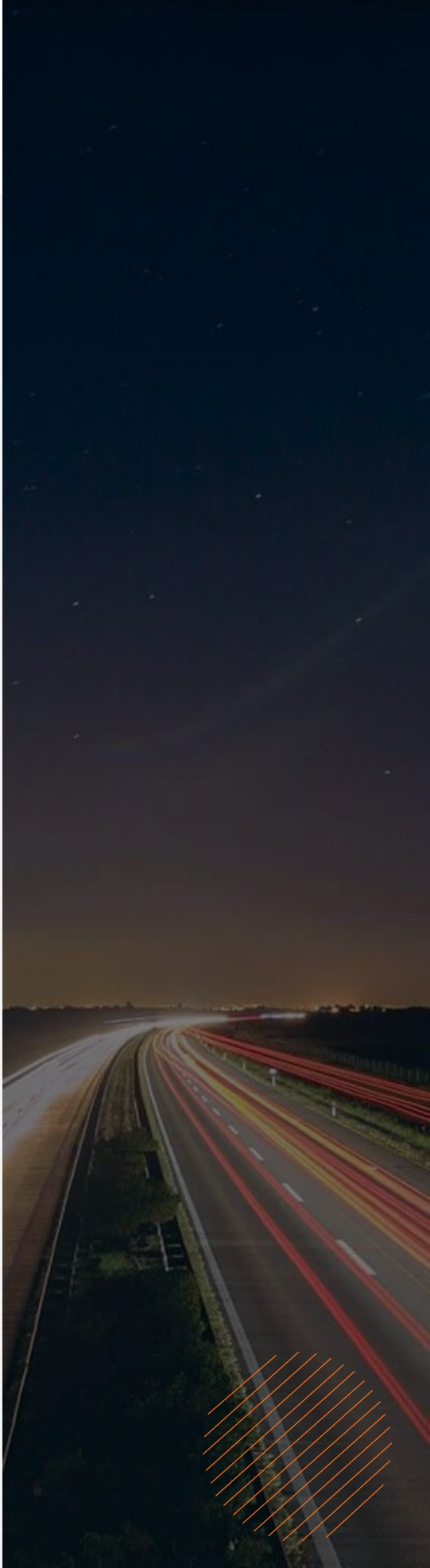
DISCLAIMER

This Modern Slavery Statement for FY25 has been prepared and published by TOT Transport on a voluntary basis as part of the company's commitment to ethical and responsible business practices. While TOT Transport is not currently required to report under the Modern Slavery Act 2018 (Cth), the company recognises the importance of transparency, public disclosure, and proactive action in addressing modern slavery risks.

In preparing this Statement, TOT Transport has addressed all mandatory reporting criteria outlined under the Modern Slavery Act 2018 (Cth). This approach reflects our commitment to doing the right thing, strengthening supply chain governance, and contributing to the elimination of modern slavery through responsible and sustainable operations within the transport and logistics sector.

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OVERVIEW: HOW WE HAVE ADDRESSED THE MANDATORY REPORTING CRITERIA

The Australian Modern Slavery Act 2018 (Cth) establishes mandatory reporting criteria for reporting organisations. The table below outlines where in this statement we have addressed the mandatory reporting requirements under the Act:

Mandatory reporting criteria under the Australian Modern Slavery Act 2018 (Cth)		Section in this statement	Page number
Mandatory Reporting Criteria 1 & 2	Identify the reporting entity and describe its structure, operations, and supply chain.	1. Reporting entities and operations 2. Our operations and supply chain	6 - 9
Mandatory Reporting Criteria 3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls.	3. Supply chain risk assessment 4. Risks of modern slavery in our operations and supply chain	10 - 12
Mandatory Reporting Criteria 4	Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	5. Actions taken during the reporting period	13 - 14
Mandatory Reporting Criteria 5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	6. Assessing the effectiveness of our response	15
Mandatory Reporting Criteria 6	Describe the process of consultation with any entities the reporting entity owns or controls. (Only applicable to joint statements).	7. Consultation	16
Mandatory Reporting Criteria 7	Any other relevant information	8. Our future actions	17



HIGHLIGHTS OF FY 2024-25

Zero

Human rights and modern slavery, harassment or discrimination related complaints received



95% coverage

Modern slavery related contractual obligations for suppliers and subcontractors



Proactive Disclosure

Executive decision of submitting first voluntary statement in FY25



Modern Slavery Policy

Comprehensive policy and governance structure established





1. REPORTING ENTITIES AND STRUCTURE

TOT Transport Pty Ltd (ABN: 41 120 510 027) is an Australian organisation that is privately owned and operates under the control of the TOT Management Services Pty Ltd (ABN: 62 158 284 649). For the purposes of this statement, TOT Transport Pty Ltd and its controlled entity are collectively referred to as TOT. This Statement marks TOT's *first voluntary Modern Slavery Statement*. While the company's annual revenue for the reporting period falls below the reporting threshold under the Modern Slavery Act, 2018 (Cth). TOT has chosen to disclose proactively as part of its commitment to responsible business practices and transparent governance.

TOT Transport specialises in delivering comprehensive transport and logistics solutions across Australia, including warehousing, storage, courier services, and the movement of FMCG, furniture, and big and bulky goods. The company is registered at 1/17 Willfox Street, Condell Park, NSW 2200, and does not own or control any other business entities.

This Statement is published in accordance with the Modern Slavery Act 2018 (Cth) (the Act) and outlines the steps the company has taken to identify, assess, mitigate, and remediate modern slavery risks within its operations and supply chain for the financial year ending 30 June 2025 (FY25).

TOT's business activities span across Australia, delivering a comprehensive range of transport and logistics solutions designed to meet diverse customer needs. The main business activities include:



FMCG transport – Reliable, time-sensitive delivery of fast-moving consumer goods across Australia.



Courier services – Flexible, responsive courier solutions for fast local deliveries.



Furniture and bulky-goods transport – Secure handling and transport of furniture and oversized items.



Linehaul operations – Long-distance freight movement across major transport corridors.



Warehousing and logistics – Integrated storage, inventory management, and end-to-end logistics support.

2. OUR OPERATIONS AND SUPPLY CHAIN



Our operations

TOT delivers end-to-end transport, warehousing, and logistics solutions across New South Wales and the Australian Capital Territory through dedicated facilities that enable the safe, efficient, and reliable movement of FMCG goods, furniture, bulky freight, and other commercial products. Our operations span local courier services, warehousing and storage, and long-distance linehaul transport, supporting a diverse portfolio of commercial customers. TOT’s supply chain comprises **transport subcontractors, hospitality providers, industrial cleaning services, IT support partners, recruitment and labour-hire agencies, solar panel services, and warehousing providers** that enable day-to-day operations. TOT does not own or control any other entities.

Figure 1: Our Presence



Regions	ACT	NSW
Facilities	1	1

In FY25, TOT Transport maintained a dynamic and diverse workforce across its transport, warehousing, and logistics operations. Approximately 80% of the workforce were permanent employees, while 20% were engaged through reputable labour-hire agencies to ensure operational flexibility during periods of peak demand.

Among the permanent workforce, around 80% were male and 20% female, whereas the agency workforce comprised approximately 40% male and 60% female. This balanced workforce structure reflects the operational realities of the logistics industry and enables TOT Transport to effectively manage fluctuating freight volumes, seasonal demand, and customer scheduling requirements, while upholding equitable, ethical, and safe employment practices across all forms of engagement.



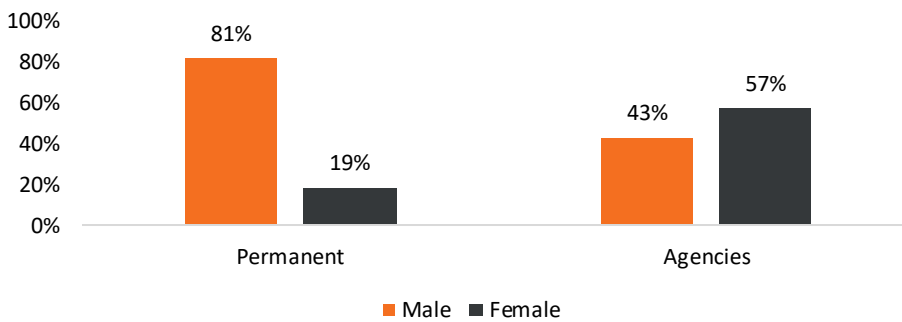
OUR WORKFORCE

This section outlines the composition of TOT's workforce, distinguishing between permanent employees and labour-hire agency workers. It provides a snapshot of role distribution, gender representation, and the types of work undertaken across each group. The analysis illustrates how permanent roles provide stability and continuity within the business, while agency arrangements offer flexibility to meet fluctuating operational demands. It also highlights opportunities to strengthen diversity, enhance oversight of labour-hire practices, and improve the management of ethical employment risks across our workforce.

The "Employee Overview: FY25" chart below provides a detailed breakdown of the workforce composition at TOT across two categories.



Figure 2: Employee Overview (FY25)



Approximately 80% of the total workforce were permanent employees, while 20% were engaged through labour-hire agencies



Permanent

TOT employs 81% permanent male staff and 19% permanent female staff, reflecting a predominantly stable workforce. Permanent roles generally present lower modern slavery risks due to stronger job security, clearer employment terms, and established legal protections. Employees in this category primarily cover general management, operations management, compliance, fleet control, subcontractor management, account management, finance, and administrative functions.



Agencies

Within this category there are 43% male and 57% female agency workers. Labour-hire workers can face higher vulnerability to exploitation due to reduced oversight and varying employment protections compared to directly engaged staff. As a result, this group requires strengthened monitoring to ensure full compliance with modern slavery obligations and ethical labour standards. Roles undertaken by agency workers primarily include warehouse labour, forklift operations, and reach stacker driving.



OUR SUPPLY CHAIN

99.44%

Suppliers Located in Australia

In FY25, we engaged suppliers in 7 major categories to support our nationwide operations. As shown in Figure 3, the majority of expenditure relates to transportation services (97.14%), reflecting the core nature of our business. Additional spending included warehousing (1.27%), recruitment and hiring services (.06%), tyres (1.8%), warehousing services (1.27%), hospitality (.82%) and IT services (.60%) supporting operational performance, workforce capability, fleet safety, and digital efficiency. Some very low spend categories are solar panels (0.06%) and cleaning services (0.05%).

Sector, Industry or Purchase Category	% of Total Suppliers
Hospitality	0.6%
Industrial Cleaning	0.6%
IT Services	0.6%
Recruitment & Hiring	0.6%
Solar Panels	0.6%
Transportation (Including Sub-Contractors)	95.5%
Warehousing	0.6%
Total	100%

Figure 3: Procurement spent in FY25

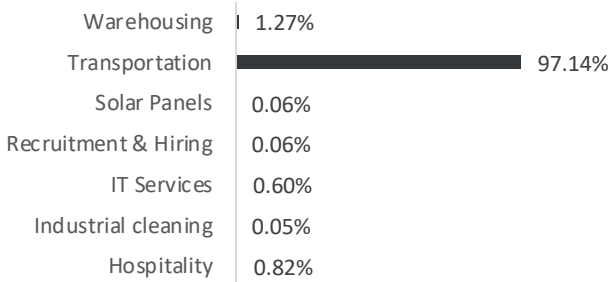
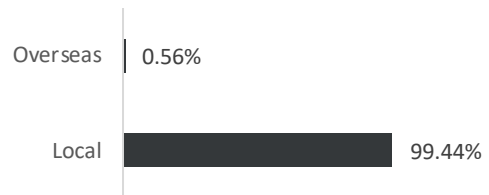


Figure 4: Suppliers overview by location

In the reporting year TOT had only 1 supplier from overseas (India)



The majority of TOT’s suppliers in FY25 were based in Australia, which reduces the likelihood of direct modern slavery exposure within our immediate commercial relationships. We recognise, however, that many Australian suppliers operate within broader global supply chains where risks are more prevalent particularly in sectors such as transport subcontracting, vehicle parts and tyre manufacturing, labour-hire channels, and ICT hardware. These categories continue to guide our risk assessment and inform our due diligence, supplier engagement, and transparency initiatives across the supply chain.

TOT’s only overseas supplier is based in India and provides back-office support and professional services. While India is identified by the Global Slavery Index as having a higher prevalence of modern slavery compared to Australia, the nature of the services sourced are office-based, skilled, and regulated financial services significantly, lowering the inherent risk of labour exploitation. As such, this relationship does not materially increase TOT’s overall risk profile, and our focus remains on managing the inherent risks already identified within our existing supplier base.



RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN



We understand and acknowledge that modern slavery is a serious violation of human rights and encompasses practices such as human trafficking, forced labour, deceptive recruitment, and debt bondage.



While TOT Transport has not identified any instances of modern slavery within our operations or direct supply chain, we recognise that these risks can exist both domestically and globally, in tier 1 or tier 2 and tier 3 suppliers.



We also acknowledge that exploitative practices such as underpayment, unsafe working conditions, harassment, and excessive working hours though not classified as modern slavery can escalate to situations that heighten vulnerability to slavery-like conditions.

During FY25, TOT Transport engaged an independent third-party consultant to support the development of its first voluntary Modern Slavery Statement. The engagement focused on identifying and assessing modern slavery risks using the 'cause, contribute, and directly linked' framework outlined in the United Nations Guiding Principles (UNGP) on Business and Human Rights. This structured approach enabled the organisation to build a foundational understanding of its risk profile, establish governance mechanisms, and set a clear baseline for continuous improvement in future reporting cycles.





RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN



We consider the risk of TOT causing modern slavery within its direct operations to be low. All permanent and non-permanent employees are engaged under formal employment contracts that meet Australian employment standards at a minimum. However, we recognise that the use of temporary workers through labour-hire agencies introduces elevated risk, as these individuals are not directly employed by TOT.



There have been documented instances in Australia where labour-hire providers have withheld personal documents and payslips, made excessive wage deductions, or used threats of deportation against vulnerable workers. We acknowledge that TOT could contribute to modern slavery risks if we were to engage labour-hire agencies that do not uphold strong record-keeping, transparent employment practices, and high ethical standards.



In addition, TOT engages one overseas supplier in India to provide outsourced financial services. While this relationship represents a small portion of our overall spend and involves skilled, office-based professional services (which carry inherently lower modern slavery risk), India is identified by the Global Slavery Index as having a higher prevalence of modern slavery compared to Australia. As a result, we remain alert to these risks and recognise the need for continued due diligence to ensure that this supplier maintains ethical labour practices consistent with TOT's expectations.

RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAIN

As TOT engages a range of contractors and suppliers across Australia many of whom source goods, materials, or labour from broader Asia-Pacific supply chains we acknowledge the potential for being directly linked to modern slavery through our procurement activities. While TOT has not identified any instances of modern slavery, the supplier categories on the following page present varying degrees of inherent risk, informed by industry trends and known vulnerabilities in global value chains.



RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAIN

Warehousing Services:

These operations often involve physically demanding, low-visibility work environments, sometimes supported through agency or shift-based labour. These conditions may heighten risks of underpayment, excessive overtime, and lack of formal employment records, especially where subcontractors or labour-hire intermediaries are used. Limited transparency in upstream labour sourcing can further increase exposure.

Recruitment and Labour-Hire Providers:

Recruitment and labour-hire channels remain a known high-risk category in Australia. Common issues include withholding personal documents or pay slips, excessive or unlawful wage deductions, unsafe working conditions, and threats of deportation—practices that may amount to debt bondage or forced labour. As TOT engages temporary workers, this category requires continued scrutiny to ensure providers uphold ethical and legally compliant labour practices.

Cleaning and Property Services:

Cleaning services in Australia are widely recognised as a sector with elevated modern slavery risk due to low visibility, dispersed worksites, and reliance on migrant and temporary labour. Documented issues include wage theft, excessive overtime, non-payment of entitlements, and coercive behaviors. These practices can escalate into debt bondage or forced labour if not properly managed.

IT and Professional Services:

IT hardware and electronic components frequently originate from complex global supply chains with documented exposure to forced labour, child labour, and unsafe working conditions—particularly in mining (e.g., cobalt), semiconductor manufacturing, and electronics assembly. While IT support and software services procured within Australia generally present lower inherent risk, upstream hardware supply chains remain vulnerable to exploitation due to limited transparency and reliance on high-risk jurisdictions. TOT also engages one overseas supplier in India to provide outsourced financial and professional services. Although India is identified by the Global Slavery Index as having a higher prevalence of modern slavery compared to Australia, the nature of the services sourced—skilled, office-based, and regulated financial services—significantly reduces the likelihood of direct exploitation. Nevertheless, we acknowledge that broader ICT and business process outsourcing sectors in India may rely on subcontracted or temporary labour, which can present risk factors such as excessive working hours, inadequate grievance mechanisms, or weak protections for contract workers. As such, this category warrants ongoing monitoring to ensure suppliers uphold ethical employment practices aligned with TOT's expectations.



ACTIONS TAKEN DURING THE REPORTING PERIOD

During the reporting period (FY25), TOT Transport took meaningful steps to strengthen its policy, increase awareness, and oversight of modern slavery risks across its operations and supply chain.

1 Decision to Voluntarily Disclose a Modern Slavery Statement

Although TOT Transport is not legally required to report under the Modern Slavery Act 2018 (Cth), the management of the company made the strategic decision to voluntarily lodge a Modern Slavery Statement. This reflects the organisation's commitment to transparency, ethical business practices, and responsible supply chain management. Voluntary reporting ensures:



Proactive alignment with industry expectations and customer requirements.



Enhanced visibility of the company's risk-management approach.



Strengthened trust with partners and stakeholders.



Demonstrated leadership in ethical conduct and sustainability governance

2 Enhancing Transparency Through EcoVadis Assessment

During FY25, TOT Transport made the strategic decision to pursue external verification of its human rights and modern slavery practices through the EcoVadis platform, one of the world's leading sustainability and ethical performance rating agencies. This decision reflects the company's commitment to accountability, and continuous improvement in identifying, managing, and mitigating modern slavery and human rights risks across its operations and supply chain.



3 Adoption of a Modern Slavery Policy

During the reporting period, TOT Transport introduced a comprehensive Modern Slavery Policy that established a clear governance framework and strengthened organisational accountability for managing modern slavery risks. Key actions included:



Strengthened governance: Board and CEO oversight was formalised, with annual review and approval of the Modern Slavery Statement. Senior leaders were tasked with embedding a zero-tolerance culture and ensuring operational compliance.



Human rights integration: The policy embedded commitments aligned with the UN Guiding Principles (UNGP), including safe working conditions, non-discrimination, fair wages, privacy protection, and respect for vulnerable groups and impacted communities.



Clear roles and responsibilities: Employees were required to understand and adhere to the policy and report concerns. Contractors and suppliers are required to comply, with non-compliance subject to corrective action or contract termination.



Continuous improvement: The policy established an annual review cycle and reinforced mandatory compliance, ensuring alignment with evolving legislation and human rights best practice.

4 Introduction of contractual obligation of Modern Slavery Compliance

In FY25 the Modern Slavery Act compliance became a key part of TOT Transport’s procurement policy. Approximately **95% of the company’s procurement spend** is now covered under formal contracts that include **specific clauses requiring compliance with the Modern Slavery Act 2018 (Cth)** and other relevant human rights legislation. Under these contractual obligations, all contractors and suppliers are required to:

- Must abide by any requirements under the provisions of the Modern Slavery Act 2018 (Cth) or any legislative requirements relating to modern slavery and human rights;
- Promptly notify TOT Transport of any identified or suspected modern slavery risks within their operations or supply chains; and provide evidence of what steps (if any) the supplier is taking to address any identified modern slavery risk(s) in accordance with the legislative regime.

These provisions ensure that TOT Transport’s supplier relationships are founded on transparency, accountability, and shared responsibility for upholding ethical labour practices throughout the supply chain.



ASSESSING THE EFFECTIVENESS OF OUR RESPONSE

As this is TOT Transport's first voluntary Modern Slavery Statement, the organisation has taken foundational steps to formally recognise and strengthen its approach to human rights and ethical supply chain management.

During FY25, TOT Transport strengthened its approach to addressing modern slavery risks by embedding clearer accountability, external verification mechanisms, and contractual safeguards. The effectiveness of these actions is assessed through ongoing monitoring, management oversight, and preparation for third-party evaluation.



01

Measuring the Impact of Voluntary Disclosure

Voluntarily publishing a Modern Slavery Statement enhanced transparency, strengthened stakeholder trust, and increased organisational awareness of modern slavery risks. Management oversight and Board review processes provided additional assurance on the robustness of internal governance.



02

Getting an External Verification (EcoVadis)

The decision to pursue independent verification through the EcoVadis platform established a clear framework for external benchmarking and continuous improvement. The assessment, to be implemented in FY26, will provide measurable indicators of progress in human rights and ethical performance.



03

Monitoring Policy Implementation and Compliance

The introduction of TOT's Modern Slavery Policy has created a structured governance process with defined roles, mandatory compliance, and annual reviews. Internal monitoring tracks adherence to the policy and ensures corrective action where required.



04

Evaluating Supplier Compliance Obligations

With approximately 95% of procurement spend covered by contracts containing modern slavery clauses, supplier compliance is reviewed through contract management and risk assessments. Evidence of supplier actions and notifications of potential risks provide a key mechanism for evaluating effectiveness.

Together, these measures ensure that TOT Transport's actions are not only implemented but continually assessed for relevance, accountability, and improvement in managing human rights and modern slavery risks across the supply chain.

CONSULTATION



As this is TOT Transport's first voluntary Modern Slavery Statement, the company undertook a structured internal consultation process to ensure the Statement accurately reflects our operations, governance arrangements, and emerging approach to managing modern slavery risks.



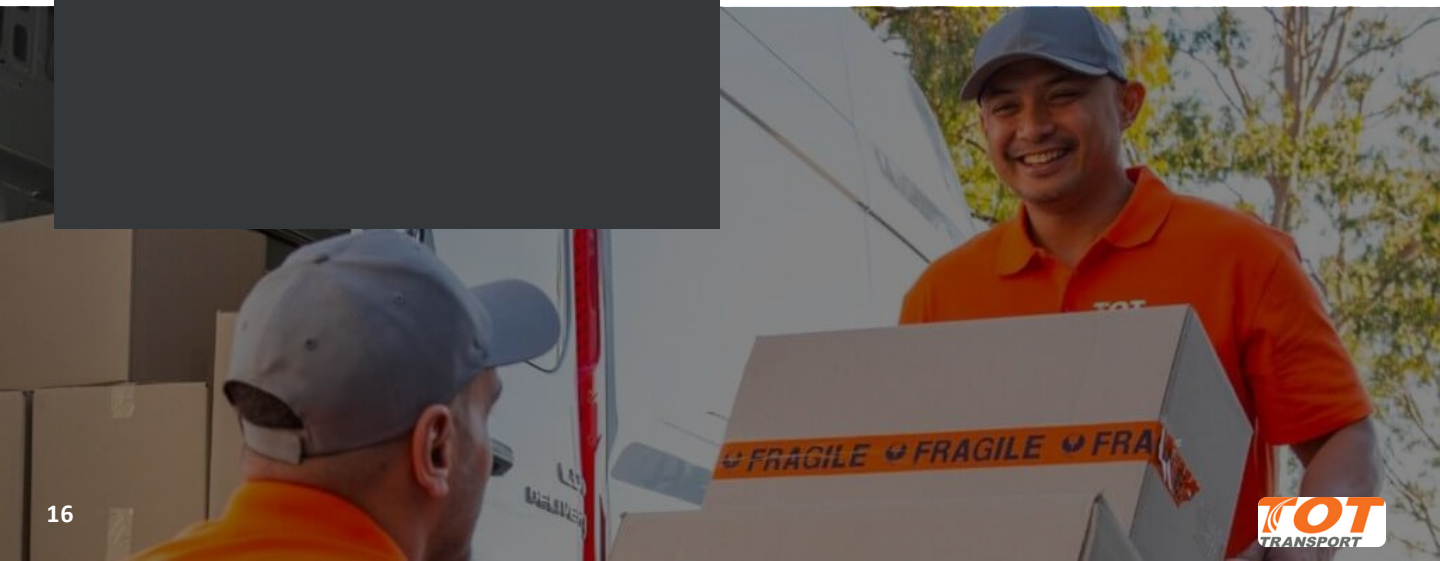
Given that TOT Transport does not own or control any subsidiaries or related entities, the consultation process was focused solely within the organisation. Key functional leads including Operations, Human Resources, Finance, Safety, and Compliance were engaged to provide input into risk identification, policy development, and the refinement of reporting content.



To support a consistent and robust approach, TOT Transport also worked closely with an external specialist consultancy. This collaboration helped validate the accuracy of information, test our assumptions, and ensure alignment with the Modern Slavery Act 2018 (Cth), the UN Guiding Principles on Business and Human Rights.



Feedback from internal stakeholders was incorporated through iterative reviews and management discussions. The final Statement was endorsed by the Executive Team and approved by the Board of Directors, confirming that it appropriately reflects TOT Transport's governance context, actions taken, and future commitments.





OTHER INFORMATION: ACTIONS WE INTENDED TO TAKE IN UPCOMING YEAR

As TOT Transport progresses beyond its first voluntary disclosure, the organisation will focus on building a stronger, more mature framework for identifying, managing, and mitigating modern slavery risks. Key actions planned for the upcoming year include:



01

Strengthen Governance and Policy Frameworks

- › Embed the newly introduced Modern Slavery Policy across the organisation through enhanced communication and leadership oversight.
- › Establish a formal Modern Slavery Working Group to coordinate efforts, track progress, and support implementation.



02

Build Internal Capability and Awareness

- › Enhance modern slavery training content and ensure completion by majority of employees, suppliers and sub-contractors.
- › Provide targeted training for managers, procurement staff, and frontline operational teams on identifying red flags and responding appropriately.



03

Improve Reporting and Grievance Mechanisms

- › Promote the whistle-blower hotline and internal reporting channels to ensure employees, contractors, and external stakeholders understand how to raise concerns confidentially.
- › Introduce simplified reporting tools and reinforce non-retaliation expectations.



04

Establish an Effectiveness Assessment Framework

- › Work with external consultants to design KPIs and effectiveness metrics aligned with the Modern Slavery Act and UNGPs.
- › Integrate these measures into enterprise risk management and Board reporting structures.



APPROVAL AND SIGNATURE

Principal Governing Body Approval

This Modern Slavery Statement was approved by the Board of TOT Transport Pty Ltd as defined by the Modern Slavery Act 2018 (Cth)3 (“the Act”) on 22 Dec 2025.

Signature of Responsible Member

This statement is signed by Andrew Sedrak in his role as the Chief Executive Officer of and representative of the Board of TOT Transport Pty Ltd on 23 Dec 2025.

A handwritten signature in black ink, appearing to read 'Andrew Sedrak', written over a horizontal orange line.

Andrew Sedrak

as Chief Executive Officer and representative of the Board



THANK
YOU —