



AAW Group Holdings Pty Ltd

**Modern Slavery Statement FY 2025**

# Message from the Managing Director



“Modern slavery continues to be a serious global issue, affecting millions of people worldwide. AAW recognises the ongoing responsibility we carry to prevent, identify, and address potential risks within our operations and supply chains. It is an issue that requires constant vigilance, proactive management, and a commitment to ethical practices across all areas of business.

AAW continues to do its part to combat modern slavery. Through our policies, processes, and engagement with suppliers, we actively work to uphold human rights, promote ethical conduct, and maintain transparency and accountability across our operations. While the challenge remains, we are committed to making a meaningful impact in this space and embedding responsible practices throughout our business.

During this reporting period, our focus has been on strengthening key areas to manage modern slavery risks effectively. We enhanced our supplier due diligence and risk assessments to better identify and mitigate potential issues. We maintained regular induction training on modern slavery for all employees and implemented additional initiatives to ensure compliance with other regulatory obligations while reinforcing our modern slavery commitments. Beyond compliance, we also focused on giving back, participating in charitable activities, sustainability initiatives, and other programs that contribute positively to our communities and social impact.

This statement outlines the steps we have taken during the reporting period and highlights our ongoing commitment to ethical operations, human rights, and modern slavery mitigation. We will continue to build on these efforts and report on our progress in the next statement, maintaining a strong focus on continuous improvement and responsible business practices.”

Andrew Maguire  
Managing Director

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# 1. Purpose of the Statement

AAW Group Holdings (AAW) recognizes and accepts our responsibility to respect the human rights of all people without any discrimination and are committed to preventing and addressing any risks of adverse human rights impact linked to our operations and supply chain. As part of our commitment to upholding human rights for all, we take a stand against modern slavery and commit to working with all our stakeholders to reduce and eradicate the practice of modern slavery and human trafficking within our operations and beyond.

This Modern Slavery Statement, made pursuant to the Australian Modern Slavery Act 2018 (the Act), aims to articulate the risks of modern slavery within AAW's operations and supply chains, and the steps we have taken, and will take in subsequent reporting periods, to manage and address these risks.

Our Modern Slavery Statement has been prepared in accordance with the mandatory reporting criteria required by the Act, being:

- A description of AAW entity and its structure;
- An outline of our operations and supply chains;
- An assessment of the potential modern slavery risks in those operations and supply chains;
- Actions taken to assess and address those risks in the reporting period;
- Assessment of the effectiveness of such actions and future steps;
- A description of the process of consultation with the entities owned and controlled by AAW in preparing this Modern Slavery Statement.

## 2. Understanding Modern Slavery

Modern slavery refers to situations where individuals are exploited and cannot refuse or leave work due to threats, coercion, deception, or abuse of power. It is a serious violation of human rights and remains a global issue affecting millions of people, particularly in complex supply chains and industries reliant on low-skilled, migrant, or outsourced labour.

Under the **Australian Modern Slavery Act 2018**, modern slavery includes practices such as forced labour, debt bondage, human trafficking, forced marriage, servitude, and the worst forms of child labour. These practices can occur in any country, industry, or tier of a supply chain.

For businesses, modern slavery risks often arise where there is:

- reliance on vulnerable or migrant workers
- limited visibility across multiple subcontracting layers
- poor labour practices or weak regulatory oversight
- pressure to reduce costs or deliver goods quickly
- outsourced services where working conditions may be harder to monitor

Understanding these risks is essential to ensuring that AAW conducts its operations ethically and responsibly. By increasing awareness of how modern slavery can occur, we are better able to identify vulnerabilities, strengthen controls, and take meaningful steps to prevent, detect, and address exploitation within our operations and supply chain.

### 3. Our Structure and Operations

Founded in 1983, AAW Group is a privately owned Australian logistics organisation headquartered in Southbank, Victoria. The Group operates through several specialised entities under a unified corporate structure, providing integrated logistics services across Australia and New Zealand.

AAW Group’s core activities include international freight forwarding, shipping and agency services, bulk liquid logistics, project logistics, and customs brokerage, supported by corporate and administrative functions responsible for documentation, customer engagement, safety, and regulatory compliance.

All entities within the Group operate under a single governance and risk management framework, supported by common policies, ethical standards, and oversight processes. This structure ensures consistency across operations and aligns our approach to compliance, supply chain management, and stakeholder engagement.

While each entity contributes unique expertise, our centralised model provides clear oversight of supplier relationships, third-party service providers, and global business partners. This coordinated approach enhances transparency, strengthens accountability, and supports our commitment to managing operational and supply chain risks - including modern slavery risks - across all areas of the business.



**Freight Forwarding – Global Coverage: Sea & Air**

Extensive expertise internationally and across Australia/New Zealand:

- Export, Import & Cross Trade
- FCL, Consolidation, Reefer
- Customs Brokerage in-house
- Warehousing & Fulfilment
- Visibility Platform - Lighthouse
- Global Partner Network



**Supply Chain Management & Logistics Services**

Integrated logistics capabilities developed through customer partnerships, delivering niche solutions to blue chip customers and specialised SME’s markets: Automotive, FMCG, Agriculture, Chemicals, Raw Materials and Commodities Trading.



**Domestic Coastal Cargo & Road/Rail Services**

Specialist in Sea, Road and Rail movements of dry and refrigerated cargo between all major Australian cities, and across in-land and regional locations. Able to provide bespoke door-to-door logistics solutions.



**Regional Specialisation – Fresh Produce & General Cargo**

Dedicated to servicing the logistics needs of regional Australia with technical expertise in cold chain logistics and a broad range of capabilities to provide solutions for the unique requirements of regional customers.



**Shipping Line Agency / Sales and Marketing**

Comprehensive range of commercial and operational services for variety of vessel sizes and types. Support services including: crew changes, vessel provisions, maintenance and repairs, crew medical services, port services, route surveys, and waste management.



**Domestic Bulk Liquid and Dangerous Goods Forwarding**

Bulk liquid services for domestic Australian and New Zealand markets. Fleet management, transport, & decanting – equipment including: ISO Tank Containers, IBCs, Flexi-tanks, & Dry units. Product types including: chemical, foodstuffs, and cryogenically liquefied gases.



**International Bulk Liquid and Dangerous Goods Forwarding**

End-to-end international services for the movements of ISO Tanks (as an agent for HOYER Group) and Flexi-tanks to worldwide destinations. Specialised skills in the movement of a variety of dry and liquid dangerous goods to international destinations.



**Project Forwarding, Chartering and Management**

Highly skilled & experienced project professionals who develop engineered transport solutions for project cargoes to and from all points of the globe, including cross-trade movements. Cargo types including: Break-bulk, RoRo, Heavy Lift, Modular Cargo, and Air.

## 4. Our People

In FY2025, AAW's workforce comprised 112 employees in Australia and 7 in New Zealand, including casual staff and independent contractors. We continued to outsource selected administrative functions to the Philippines. These workforce arrangements are overseen through established HR policies and processes designed to promote ethical employment practices and help mitigate modern slavery risks. The same controls and safeguards have continued to apply in the current financial year.

All new employees are engaged through reputable recruitment channels, with verification of qualifications and right-to-work status. Recruitment procedures are reviewed periodically to ensure they remain transparent, merit-based, and compliant with workplace laws, including anti-discrimination requirements. Contractor engagements are formalised through agreements that reflect AAW's expectations for lawful and ethical employment practices.

Employee remuneration is assessed against the National Minimum Wage, relevant Modern Awards, and market benchmarks to ensure fairness and compliance with labour standards. We support safe and respectful working conditions by offering workplace flexibility, wellbeing initiatives, and programs that promote a healthy work environment.

AAW fosters continuous learning and development by providing employees with resources, training, and support to perform their roles effectively and advance their careers. Employees are made aware of AAW's ethical business standards, including our commitment to preventing modern slavery. Established grievance mechanisms - such as WHS reporting channels, Working Together Policies, and Whistleblower procedures - ensure staff can raise concerns safely and confidentially, with protections against retaliation.

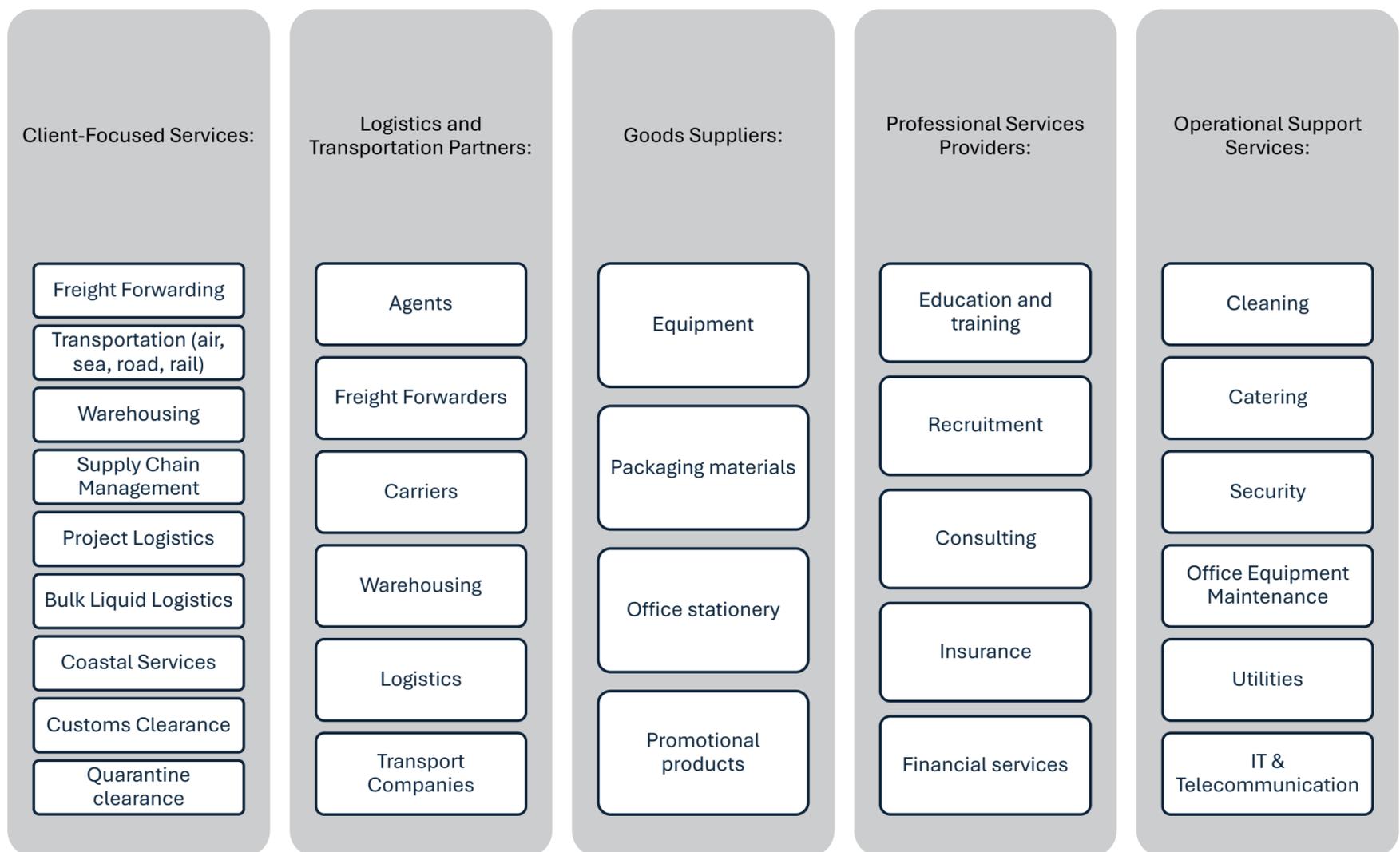
Our HR and management teams continue to monitor compliance with internal policies, legal obligations, and modern slavery expectations across our operations. Through these ongoing actions, AAW seeks to operate responsibly, uphold human rights, and support the objectives of the Modern Slavery Act 2018 (Cth).



# 5. Our Supply Chain

AAW Group operates a broad and diverse supply chain that supports our freight forwarding and logistics activities across Australia and New Zealand. Our supply chain includes a mix of domestic and international suppliers who provide the goods, services, and expertise required for the delivery of our operations.

Our primary supplier categories include:



Across the group, suppliers vary in size, capability, and geographical location. Some provide ongoing services critical to core operations, while others support specific projects or corporate functions. AAW Group values long-term, collaborative partnerships with suppliers and aims to work with organisations that operate responsibly, transparently, and in a manner consistent with our expectations and standards.

The location of our Tier 1 suppliers is summarised as follows:



**Figure 1: Location of AAW Group's and its Entities Tier 1 suppliers.**

We continually review and update our supplier base to ensure resilience, compliance, and ethical practices across our operations.



## 6. Risks of Modern Slavery in our Operations

### OPERATIONS RISK

In FY2025, AAW has continued to operate exclusively in Australia and New Zealand, both of which are generally considered to have a lower risk of modern slavery based on geographic and regulatory factors. However, we recognize that modern slavery still exists in these regions, particularly affecting vulnerable workers, migrants, and those in low-skilled, casual, or insecure forms of employment.

These groups remain at heightened risk of exploitation, and we are committed to continuously assessing and addressing potential risks within our operations and supply chains. In the case of our company, AAW continues to outsource a small percentage of our operations and accounting functions to the Philippines, which has a high geographic risk of modern slavery according to the Global Slavery Index.

Our outsourced operation in the Philippines provides AAW with entry level clerical services. AAW's operations in the Philippines are not in an industry identified by the Global Slavery Index as being an industry with a risk of modern slavery, however AAW is cognisant of the elevated risks in this aspect of our operations. AAW conducts visits to the Philippine office twice a year on average, which enables us to observe workplace conditions. We also educate our partner regarding ethical workplace practices and modern slavery and have a robust whistleblower process in place accessible to our outsourced teams.

### LABOUR RISK

Throughout the reporting period, AAW has upheld a diverse workforce, encompassing permanent full-time and part-time employees, as well as temporary and casual staff. Our team, situated in Australia and New Zealand, primarily undertakes office-related responsibilities.

In our Australian operations, a small percentage of our employees are covered by a Modern Award, and those employees receive terms and conditions greater than the legislated minimums.

Additionally, a small portion of our workforce operates as casual employees, and individuals engaged under independent contracts. This flexible employment framework underscores our commitment to adaptability, ensuring a range of employment arrangements tailored to the evolving needs of our workforce. It's important to note that while acknowledging the potential for modern slavery in Australia, a significant 93% of our employees are skilled professionals. This composition significantly mitigates the risks associated with modern slavery, emphasising our commitment to maintaining a workforce characterised by expertise and professionalism.

## RECRUITMENT RISK

In relation to deceptive recruitment practices, we acknowledge that modern slavery risks are prevalent in this area, even in Australia.

In FY2025, AAW continued to engage recruitment agencies who are members of reputable Australian and New Zealand recruitment industry associations such as corporate AHRI and RCSA memberships. They also are licensed in several Australian jurisdictions. Workers engaged through recruitment agencies are engaged in Australia and New Zealand to perform administrative support work for AAW. The entitlements for all temporary labour hire appointments are confirmed in writing, regardless of the type of work an individual is engaged to undertake.

We are clear about the inherent risks of outsourcing recruitment. However, our recruitment agencies as described above, are in alignment with regulations and ethical standards – further, they do not charge recruitment fees to successful or prospective employees. These factors reassure us of the possibility of modern slavery in this element of operations, being low.

As part of the induction process, all new starters, including casual staff and independent contractors, are provided with a copy of the relevant Fair Work Information Statement. AAW also continues to mandate training on Modern Slavery compliance and provides a copy of AAW's Whistleblower Policy, which includes a mechanism for reporting modern slavery, as well as access to health and safety reporting mechanisms and other training and information as appropriate to perform their role.

AAW incorporates a comprehensive checklist into its recruitment process as a proactive measure to mitigate recruitment-related risks, including those associated with modern slavery. This ensures that all candidates are thoroughly vetted for compliance with ethical standards and legal requirements, reducing the risk of exploitation or unethical practices while avoiding unnecessary recruitment costs.

## RESPONSIBLE RECRUITMENT

Mitigating recruitment risk and preventing modern slavery



### PRE-EMPLOYMENT CHECKS

Conduct background verification and work rights confirmation



### VETTED AGENCIES

Partner only with approved recruitment agencies



### NO RECRUITMENT FEES

Prohibit charging fees to workers for job placement



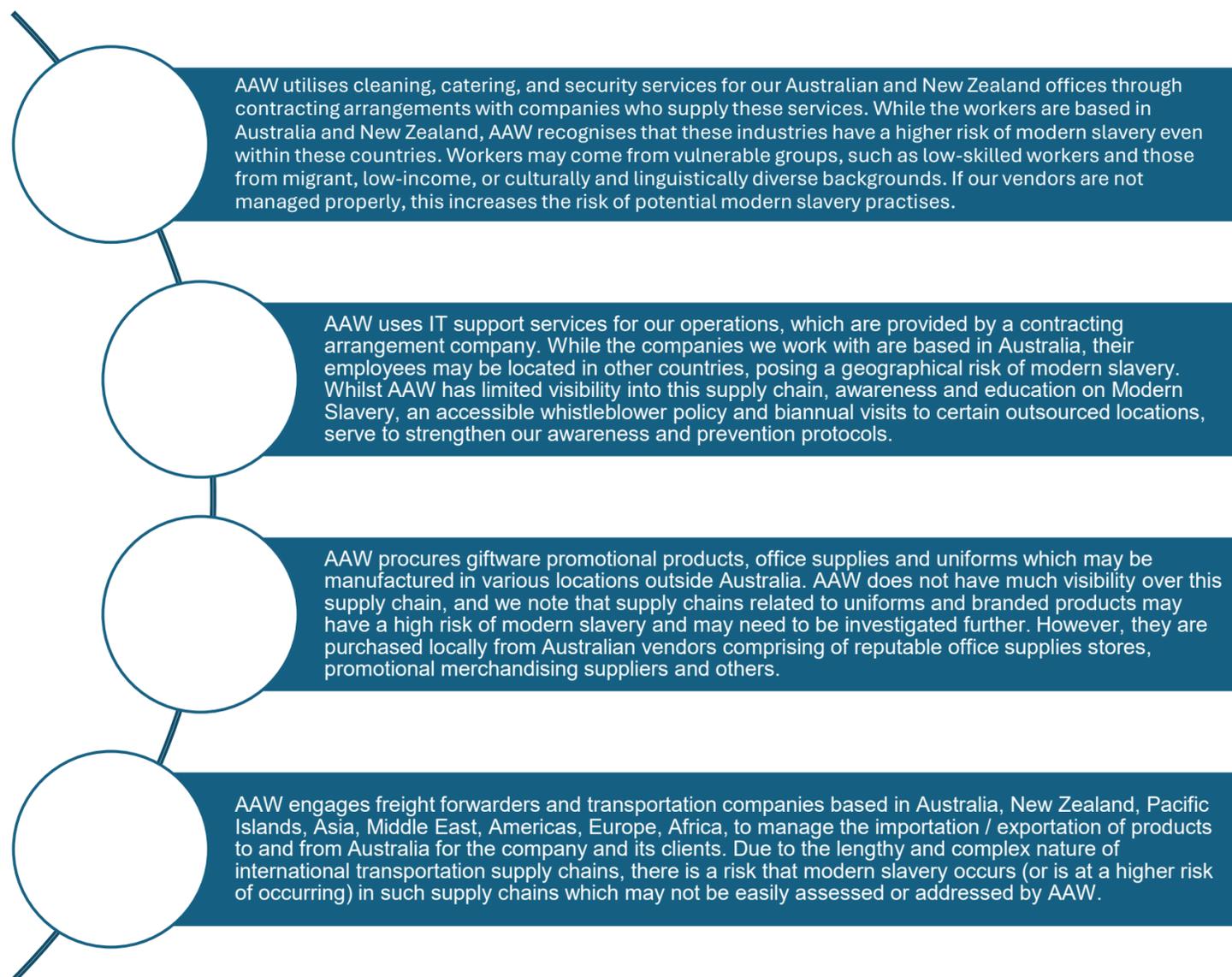
### SUPPLIER OBLIGATIONS

Require suppliers to ensure ethical employment practices

*"Responsible recruitment is the frontline defense against modern slavery."*

## 7. Risks of Modern Slavery in our Supply Chains

AAW acknowledges that, as a link in the global transport network, our supply chains are extensive, and our ability to influence suppliers - particularly larger ones - is limited. While we do not exert control over these suppliers, we actively monitor our relationships and ensure they meet applicable compliance standards. Many larger suppliers have made public commitments regarding human rights and modern slavery, which provides confidence that these entities are taking appropriate actions. AAW maintains oversight where possible and continues to assess and review our supply chain practices to support ethical and compliant operations.



# 8. Our Actions

## POLICIES AND STANDARDS

AAW Group has established a suite of policies and procedures, and regular training, that support our commitment to preventing modern slavery across our operations and supply chain. These mechanisms set clear expectations for ethical conduct, responsible sourcing, and the fair and safe treatment of all workers connected to our business. Our policies and procedures guide day-to-day decision-making, strengthen governance, and create a framework to identify, manage and mitigate potential modern slavery risks.

Key policies and procedures currently in place include our:

### Employee Handbook

- Guides employees on the company's values, policies, and workplace expectations. It highlights our commitment to ethical practices, including preventing modern slavery, ensuring all staff understand their responsibilities in promoting a safe and fair work environment.

### Workplace Bullying, Harassment and Discrimination Policy & Training

- Ensures a safe, respectful, and inclusive workplace. It prohibits bullying, harassment, and discrimination and outlines reporting and investigation processes to protect all workers.

### Whistleblower Protection Policy

- Provides safe, confidential channels for reporting misconduct, unethical behaviour, or suspected modern slavery without fear of retaliation. It supports transparency and accountability across the business.

### Flexibility at Work Policy

- Outlines the company's commitment to flexible work arrangements, supporting employee wellbeing, work-life balance, and fair access to flexible working options.

### Working Together Policy

- Promotes collaboration, mutual respect, and positive workplace relationships. It establishes expectations for teamwork and constructive communication.

### Equal Employment Opportunity (EEO) Policy & Training

- Commits to fair hiring, development, and employment practices, ensuring decisions are made without discrimination based on protected attributes.

### Modern Slavery Policy and Framework & Training

- Details AAW's commitment to identifying, preventing, and mitigating modern slavery risks in its operations and supply chain. It outlines due diligence processes, supplier expectations, and escalation pathways.

### Risk Management Procedure

- Provides a structured approach for identifying, assessing, and managing risks across the organisation, including modern slavery and supply chain risks. Supports consistent and transparent risk decision-making.

### Talent Acquisition Policy

- Ensures ethical recruitment practices, including no recruitment fees, transparent job information, and fair selection processes. Helps prevent exploitation during hiring.

### Hours of Work Policy

- Defines working hours, breaks, overtime expectations, and compliance with labour laws. Helps ensure employees are not subjected to excessive or unsafe working hours.

During this reporting period, AAW implemented and updated several key policies to strengthen our approach to ethical practices and modern slavery prevention.

- **Work Health and Safety (WHS) Policies**

We conducted a full review of our WHS Policies and Procedures, covering health, safety, and environmental requirements to ensure safe working conditions, protect workers, and reduce vulnerability to exploitation. These updates ensure compliance with recent legal changes.

- **Procurement and Supplier Onboarding**

Our Procurement Policy was reviewed and updated, and we improved our Supplier Onboarding Process. We also began implementing a new Supplier Onboarding Tool, which will be fully operational next reporting year to enhance supplier risk assessment, transparency and due diligence. In the upcoming reporting period, we will also implement our enhanced Supplier Code of Conduct, which sets clear expectations on ethical conduct, labour standards and human rights, including the prohibition of modern slavery practices. Together, these measures will strengthen our procurement framework and improve how we identify and manage modern slavery risks across our supply chain.

- **Responsible Use of AI**

Following the deployment of new AI tools, AAW implemented a Generative AI Policy to ensure AI is used ethically, securely, and responsibly. The policy is guided by core principles such as fairness, transparency, privacy, safety, and accountability, and sets clear rules for authorized use, data protection, intellectual property, staff training, and human oversight. While the policy does not directly address modern slavery, it reinforces ethical practices and responsible decision-making across our operations, supporting AAW's broader commitment to human rights and responsible supply chain management.

These new and updated policies reinforce the standards expected of employees, contractors, and suppliers, and provide clear guidelines to ensure compliance with relevant regulations, strengthen our ethical standards, and reinforce our commitment to preventing modern slavery. Any further policy developments will be reported in future periods as part of our ongoing commitment to transparency, accountability, and continuous improvement.

## **RECRUITMENT, TALENT MANAGEMENT AND INTERNSHIPS**

### **Hiring Practices**

AAW has continued its practice of engaging recruitment providers and employment agencies predominantly in relation to senior or specialist roles. Engagement of recruitment agencies requires prior approval from the Director of the relevant Business Unit (expense approval) and agency selection and commercial relationship is approved and managed by the Chief Human Resources Officer. By limiting the use of recruitment agencies to senior, specialist and difficult-to-fill roles that are well remunerated and skilled, this reduces the risk of AAW contributing to modern slavery in its operations through deceptive recruitment practices on the part of recruitment agents. AAW executes an annual salary audit to monitor compliance with employment agreements and ensure all staff are receiving above the National Minimum Wage or Award Wage (where relevant).

### **Onboarding & Role-Specific Training**

New employees participate in a comprehensive onboarding program to equip them with the knowledge, tools, and resources needed to succeed. Role-specific training ensures staff understand their responsibilities, compliance obligations, and operational standards from day one.

### **Retention**

AAW focuses on employee engagement, recognition, and career development to retain talent. Initiatives include mentoring, wellbeing programs, internal advancement opportunities, and continuous learning, fostering a highly skilled, motivated and committed workforce.

## Internship Program

AAW has established relationships with several Australian tertiary institutions, periodically offering internships to students, and has historically provided work experience to high school students. In these circumstances, students are engaged under the terms and conditions set by their university or the relevant Education department. Interns who are observing and learning as part of a student or vocational placement are ordinarily not paid, however interns who are undertaking productive work and delivering a commercial benefit are remunerated, consistent with Australia's workplace laws. Throughout the reporting period, AAW did not engage in the provision of internships or work experience placements.

## WORKPLACE CULTURE, ENGAGEMENT, AND DEVELOPMENT



### Culture and Pulse Surveys

- AAW has a structured approach to gathering employee feedback through culture and pulse surveys. These surveys help us understand workplace dynamics, identify areas for improvement, and ensure employees feel recognised and valued. They provide insights into workplace culture, engagement, and potential risks such as harassment or inequality. To maintain a consistent feedback cycle, surveys are conducted on a regular basis. The next survey, originally planned for 2025, is postponed to 2026 to prioritise other key initiatives.



### Wellbeing Initiatives

- We have introduced a wellbeing calendar to support the mental and physical health of our teams. This includes regular activities, awareness campaigns, and resources that encourage employees to prioritise self-care, balance, and a positive work environment.



### Continuous Learning & Development

- AAW delivers a structured and ongoing training program designed to ensure employees understand their compliance, safety and ethical responsibilities. Core training modules are assigned based on role requirements, with completion monitored to maintain up-to-date knowledge across the business. In addition to formal training, we also delivered a series of short, bite-size learning sessions throughout the year, providing timely guidance on key topics and helping staff stay informed of changing requirements.



### Community Engagement

- AAW supports a variety of charitable organizations, including initiatives for clean water in developing countries, educational opportunities for neurodiverse children, and cancer awareness and prevention. Through our Giving Back Policy, employees participate in an annual charity day, working in teams to contribute to local causes. This program fosters teamwork, collaboration, and meaningful community impact.

## OFFSHORE ENGAGEMENT

AAW partners with an outsourced team that handles key administrative tasks and maintains regular engagement through structured visits and activities. These include targeted training, IT support, and skill development to ensure the team has the knowledge and tools to perform effectively. We also review working conditions and operational practices to maintain a safe, supportive, and high-quality work environment. This approach fosters collaboration, promotes staff well-being, and strengthens overall team performance.

## GOVERNANCE AND SUPPLY CHAIN CONTROLS

AAW's governance framework supports our commitment to ethical operations and modern slavery compliance.

- **ISO 9001 Quality Management System**  
AAW holds ISO 9001 certification, reflecting our commitment to quality, best practices, and continuous improvement. The ISO framework also supports our modern slavery efforts by establishing processes to assess procurement procedures, evaluate risks, measure compliance with the Modern Slavery Act, and monitor the effectiveness of our actions to address modern slavery.
- **Australian Trusted Trader**  
As an accredited Australian Trusted Trader, AAW maintains rigorous security and supply chain controls. This includes safeguarding goods during storage and transport, reconciling movements against documentation, and actively identifying and mitigating vulnerabilities in our international supply chain. These measures reinforce our commitment to ethical operations and reducing modern slavery risks.



## 9. Due Diligence

### Policy Development:

In our ongoing commitment to uphold AAW's ethical standards and business integrity, we consistently evaluate and refine our internal processes and policies.

### Risk Assessment:

AAW conducts a Supplier Risk Assessment, employing a systematic evaluation process to assess and manage potential risks linked to each and every supplier. The primary objective is to identify and understand the various risks that could impact the supply chain, business operations, and overall performance. This process also underscores our unwavering commitment to ethical and sustainable business practices

### Supplier Screening and ongoing Supplier Evaluation:

All of our suppliers are required to comply with applicable laws and regulations, including the Modern Slavery Act, as well as policies and standards governing ethical business practises, safety, and the environment.

### Contractual Obligations:

AAW has agency agreements with our overseas strategic partners, and offshore processing services, and prior to entering into these agreements, it conducts financial, human resource, and regulatory due diligence. These agreements include clauses that explicitly prohibit modern slavery.

AAW has vendor agreements with local suppliers that have been modified to include specific references to the vendor(s)' working conditions or concerns about modern slavery. This form is given to all new vendors.

### Recruitment Practices:

We follow our responsible recruitment practices, which include stringent pre-employment checks for all employees, such as background checks, employment history, and confirmation of appropriate work rights.

We engage reputable labour hire agencies and follow the same process before engaging new hires, in which we identify the type of work to be outsourced, check against relevant Awards, and ensure individuals are remunerated in accordance with the relevant Award; if the Award is not applicable, we review current market rates to ensure individuals are paid a competitive rate when compared to their peers

Our suppliers are obligated to ensure that all employees and contractors working for them are legally allowed to work and that no forms of slavery or human trafficking are visible in the products and services they provide to AAW.

To streamline our recruitment processes and minimize risks, we are developing a preferred supplier list for recruitment providers. This ensures that we work exclusively with partners who meet our high standards for ethical practices, transparency, and compliance, reinforcing our commitment to responsible recruitment.

# 10. Training of Staff

Providing modern slavery training to our employees serves several crucial purposes within our organization:

**Awareness and Understanding:**  
The training increases awareness among our staff about the existence and complexities of modern slavery. It ensures that employees understand the various forms of exploitation, contributing to a more informed and vigilant workforce.

**Human Rights Education:** The training helps educate employees on human rights principles, emphasizing the importance of respecting and protecting the rights of individuals. This knowledge is fundamental in fostering a workplace culture that upholds ethical standards.

**Risk Mitigation:** By educating our staff about modern slavery risks, we empower them to identify and address potential issues within our operations and supply chain. This proactive approach contributes to risk mitigation and aligns with our commitment to responsible business practices.

**Organisational Culture:** Providing modern slavery training helps shape a corporate culture that prioritizes ethical considerations. It sends a clear message that we are dedicated to creating a workplace environment that values human rights and actively opposes any form of exploitation.

**New Hire Integration:** Incorporating the training into the induction and probation period for new hires ensures that ethical standards are communicated from the beginning of their tenure. This helps in embedding responsible practices within the organizational culture.

Overall, modern slavery training is a proactive measure to equip our workforce with the knowledge and tools needed to contribute to the prevention of modern slavery, aligning with our broader commitment to ethical business conduct.

AAW achieved full compliance with its training obligations, providing 100% of employees with induction training on modern slavery and human rights. In addition, AAW delivered key programs this year covering privacy, workplace conduct, and anti-corruption standards. Together, these initiatives reinforce ethical conduct, legal compliance, and the protection of human rights across our operations.



# 11. Monitoring and Reporting

Our efforts to prevent modern slavery continue, with the working group meeting on a regular basis throughout the reporting period.

The initiative is still fully supported by the policy owners, finance team, Chief Risk Officer, Chief Human Resource Officer, and Chief Financial Officer.

AAW has defined a framework that includes metrics that will allow the Company to track the effectiveness of its due diligence actions and report on our impact during the reporting period.

Furthermore, modern slavery reporting is included as a standing agenda item at every board and executive meeting.



## 12. Assessing the Effectiveness of our actions

AAW is fully committed to upholding the Modern Slavery Act to combat modern slavery. We acknowledge the challenges associated with measuring the effectiveness of our actions, however we are fully committed to continuous improvement. The approach that we use to assess the effectiveness of our actions is shown in the table below.

### Governance Framework

- Annual review of our People and Safety policies.
- A maturity assessment of our policies, systems, and controls, as well as our grievance mechanisms and remediation processes.
- Completion rates for awareness training.

### Risk Management

- Risk-based approach to assessing the risks of modern slavery by reviewing our business operations, procurement practises, and Tier 1 Suppliers, taking into account their geographical location, nature of goods and services supplied, and annual spend level;
- Total number of suppliers who have incorporated anti-modern slavery practises into their operations;
- Analysis of responses to supplier questionnaires;
- Analysis of responses to our Culture and Pulse Survey;
- Consultation with experts in the field to understand our obligations;
- Implement strategies to assess and address risks of modern slavery and also assess the effectiveness of our actions;

### Grievance Mechanisms

- Regular reporting on the total number of issues raised and resolved.

### Monitoring and Reporting

- Regular reporting on the total number of sites visits (strategic partners, offshore business services, key suppliers);
- Quarterly reporting to the Executive Team and semi-annual reporting to the Board of Directors;

# 13. Continuous Improvement

AAW Group is committed to the ongoing enhancement of our policies, procedures, and practices to address modern slavery risks across our operations and supply chains. We maintain a program of continuous improvement that includes reviewing and refining our governance and ethical frameworks, assessing and engaging suppliers, and embedding responsible business practices across all entities.

Our approach involves:

- Regularly reviewing and updating policies, including procurement and supplier conduct standards, to ensure they remain effective in managing modern slavery risks.
- Conducting risk assessments and engaging with suppliers to promote ethical practices and responsible sourcing throughout the supply chain.
- Providing ongoing training and awareness initiatives for staff to strengthen understanding of modern slavery risks and reporting obligations.
- Monitoring and evaluating the effectiveness of these initiatives to identify opportunities for further improvement.
- Maintaining transparency through annual reporting on actions taken, progress made, and lessons learned in addressing modern slavery risks.

Through these ongoing efforts, AAW seeks to continually strengthen its approach to identifying, mitigating, and managing modern slavery risks across all aspects of the Group’s operations.

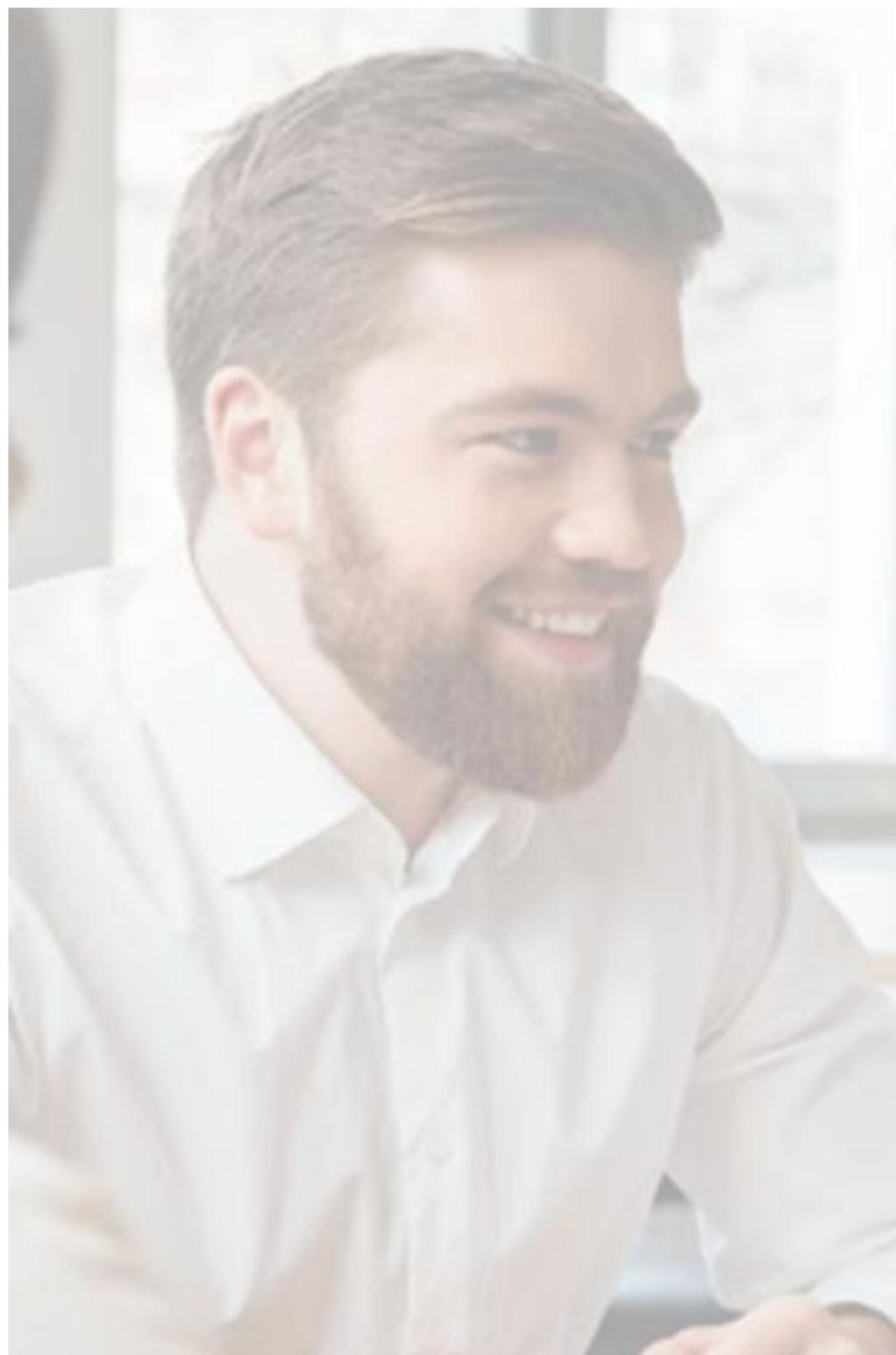


## 14. Consultation

This statement was prepared in consultation with AAW Group Holdings Pty Ltd (ACN 007 257 865) and all its subsidiaries and controlled entities, including:

- AAW Global Logistics (Australia) Pty Ltd (ACN 668 555 048)
- AAW Bulk Liquid Logistics Pty Ltd (ACN 668 554 710)
- AAW Global Logistics (NZ) Limited (NZCN 6844333)
- Regional Shipping Services Pty Ltd (ACN 087 872 580)
- Coastalbridge Pty Ltd (ACN 668 259 818)
- Joint venture: Hoyer Logistics Australia Pty Ltd (ACN 625 946 232)

The consolidated statement was reviewed and formally approved by the Board of Directors of AAW Group Holdings Pty Ltd on 22 December 2025, confirming oversight of modern slavery risks across the Group and compliance with the Modern Slavery Act 2018 (Cth).





**ABN**

14 007 257 865

**Street Address**

102 Dodds Street Southbank VIC 3006

**Postal Address**

P.O. Box 952 South Melbourne 3205

**Website**

[www.aaw.com.au](http://www.aaw.com.au)

**Telephone**

61-3-9611 6860

**Contact us**

[compliancedept@ilm.com.au](mailto:compliancedept@ilm.com.au)