



MODERN SLAVERY STATEMENT

Reporting period: 1 July 2023 – 30 June 2024

This Joint Modern Slavery Statement (**Statement**) is made pursuant to sections 14 and 16 of the *Modern Slavery Act 2018* (Cth) (**the Act**).

The entities covered by this statement are:

- (a) Direct Freight Express Pty Ltd (ABN 66 060 136 870) (Direct Freight Express); and
- (b) Direct Freight (Aust) Pty Ltd (ABN 32 071 822 172) (Direct Freight Aust).

*(These will be referred to as “**Direct Freight**” unless specifically identified otherwise)*

Each of these entities has an annual consolidated revenue of over \$100 million in its financial year from 1 July 2023 - 30 June 2024.

Direct Freight Express does not have any employees. Rather, it deals with operational matters such as the assets that Direct Freight Aust uses on a daily basis, as well the maintenance of those assets, and is responsible for the purchasing of fuel, parts and other essentials.

The Statement covers the reporting period from 1 July 2023 to 30 June 2024 and addresses the mandatory reporting criteria, as required by section 16 of the Act.

About Direct Freight

Section 16 (1) of the Act

Direct Freight is an independent, wholly Australian owned operation, with its core business providing premium express road transport services throughout Australia.

With the Head Office based in Sydney, Direct Freight operates across 60 separate depots across Australia and employs over 2,000 employees.

Direct Freight is a goods delivery and logistics company. Whether that be delivering small parcels to a residence or transporting large items, Direct Freight aims to move domestic and commercial goods across the country.

The services provided by the Direct Freight Group include:

- Bulk Freight Distribution
This includes pallet, bulky and heavy item movements to destinations throughout Australia.
- Premium Express Parcel Distribution
Here; Direct Freight transports urgent parcels reliably and on time, generally handled without mechanical aids with the inherent requirement that the goods be delivered in a timely manner to its destination throughout Australia.
- Specialised Logistic Services
Direct Freight provides warehousing and customer specialised freight and transport requirements.

In the 2022/23 financial year, Direct Freight's operations included:

- A nationwide network of transport depots of 60 locations, located strategically throughout Australia.
- A workforce of over 2000 people, comprising of 1800+ employees and 200+ independent contract drivers.
- A fleet of over 2000 vehicles, comprising of 1200+ trucks, 150+ prime movers, 450+ trailers and 350+ forklifts.

Structure, operations and supply chain of Direct Freight

Section 16(1)(b) of the Act

The Direct Freight supply chain is extensive, comprising 1000+ suppliers and contractors. This includes suppliers of the following:

- Agent Distribution Services(Australia)
- Vehicle Fleet purchases
- Fuel and Gas Suppliers
- Equipment Hire
- Fleet Maintenance; Vehicle repairs, Vehicle parts, Tyres
- Labour Hire
- Interstate (Long-distance Linehaul) Services
- Plant and Equipment Maintenance
- Property Maintenance & Cleaning Contractors

- Professional Services; Legal, Medical, Recruitment, Security, Insurance
- Information Technology Services

Direct Freight's presence is wholly Australian, and it only delivers, whether by bulk or individual parcels, within Australia. As such, all Direct Freight employees, and all sub-contractors engaged to assist in the delivery of goods are based in Australia.

Beyond its operations being wholly Australian, its supply chain may extend beyond Australia. Direct Freight's suppliers have operations that extend across many countries.

Risks of modern slavery practices in the operations and supply chains, and any entities the Business owns or controls

Section 16(1)(c) of the Act

Employment

Direct Freight does not consider that it has a high risk of directly causing or contributing to modern slavery practices related to its own team members. The Direct Freight workforce is employed directly by Direct Freight entities under awards, and contracts. Direct Freight also engages independent contractors from time to time and occasionally relies on services provided by labour hire agencies.

Direct Freight has a People & Culture team which oversees the terms and conditions of employment with Direct Freight to ensure compliance with Australian workplace laws, including *the Fair Work Act 2009* (Cth) and work health and safety legislation. Direct Freight is confident there are no modern slavery practices within operations directly under its control because it has high visibility over its own employees.

For employees engaged through labour hire agencies or as independent contractors, Direct Freight cannot definitively exclude the possibility of a level of risk relating to modern slavery as it does not have the same level of oversight over the operations of labour hire providers and independent contractors.

A type of risk that may materialise for independent contractors is that labour hire providers are not paying employees in accordance with their minimum standards. Additionally, on the basis of the type of engagement, independent contractors may be exposed to sham contracting or deceptive practices.

Finally, Direct Freight delivers cargo and parcels that originate from all around the world. Direct Freight has absolutely no control or visibility over the manufacture of the items it delivers or how the products get into Australia if they did come from overseas. Direct Freight's role is purely to deliver the goods once they are unloaded from the plane or ship on which they came. Often, Direct Freight does not know what is inside the parcels that it is delivering.

Procurement of goods and services

Direct Freight purchases goods and services from suppliers who are almost exclusively Australian based. Direct Freight engages with these suppliers for the purchase of vehicle mechanical parts, tyres and fuel.

These suppliers are based in Australia, however some of their products and services may be, partly or wholly, manufactured in other countries in the Asian, North American and European regions.

Some of the potential risks that may arise in Direct Freight's suppliers' supply chain are identified below:

- Team members working for a supplier may not receive their relevant minimum conditions
- Subcontracting of labour, whose working conditions are not visible to our suppliers
- High risk geographical locations for the manufacturing of uniforms
- Migrant labour exploitation
- Poor visibility over long and complex supply chains

Most of Direct Freight's larger suppliers have issued their own Modern Slavery statements. Direct Freight's suppliers, including fuel and labour hire providers, have up to date and robust modern slavery statements. For these reasons, Direct Freight believes the risks of modern slavery are being assessed by its suppliers and action is being taken.

Top suppliers are:

- BP Australia & Ampol (Fuel supplies)
- Elgas Australia (LPG gas)
- Gilbert & Roach (PACCAR TRUCKS KENWORTH)
- North East Isuzu (Trucks)
- Summit (Labour Hire Contractor)
- Work In It Pty Ltd (Uniforms)

Actions by Direct Freight to assess and address those risks, including due diligence and remediation processes

Section 16(1)(d) of the Act

Direct Freight ensures that its employees receive at least the minimum entitlements under the National Employment Standards (**NES**), such as annual leave, personal / carer's leave etc and it pays employees at least the minimum modern award rate for each hour worked as well as the relevant penalties, such as shift allowances, overtime and weekend penalty rates, where they are applicable. For the vast majority of employees, they are paid well above the relevant modern award rates to ensure it can attract and retain the best employees in the industry to the organisation.

Over the last several years, Direct Freight has given employees wage increases that are well above the increases given by the Fair Work Commission and even further above CPI, sometime as high as 6%. These have been dictated by market forces in the transport industry and need to be paid in order for Direct Freight to retain and attract staff.

Direct Freight also has the relevant systems and processes in place to ensure matters such as taxation, superannuation, workers compensation and all other statutory and contractual entitlements are properly attended to. Direct Freight regularly engages with external legal counsel in order to ensure it is meeting its various legal obligations.

Direct Freight also has an active and up to date Modern Slavery and Whistle-blower policy in place for its employees. Employees are provided copies of and training on these policies when they join Direct Freight. This policy has been in effect since 2021 and Direct Freight has not received a complaint under either of the policies.

Suppliers are made aware of Direct Freight's modern slavery statement and a copy is readily available on its website.

Direct Freight acknowledges that its processes and procedures in terms of its modern slavery obligations are a work in progress and require continuous diligence.

How Direct Freight assesses the effectiveness of such actions

Section 16(1)(e) of the Act

Employment

For Direct Freight's own employees, Direct Freight employs payroll specialists to ensure that all employees are being paid at least the appropriate minimum rates of pay as well as the applicable overtimes and penalty rate, allowances, loadings etc. Direct Freight also seeks external legal advice from specialist employment lawyers to ensure that its employees receive the correct entitlements.

These are effective to the extent that very rarely do Direct Freight, and the broader Direct Freight, have any issues around the under payment of staff or complaints about the non-payment of other entitlements such as annual leave, long service leave etc.

Procurement of goods and services

Direct Freight enters into commercial contracts with its sub-contractors and negotiates rates at or above industry standard. Direct Freight has rigorous accounting and invoicing processes that ensure bills are paid within a reasonable period to Direct Freight suppliers and sub-contractors.

Direct Freight plans to implement systems and processes with our suppliers, contractors and business partners so that we can effectively assess the compliance with respect to our required business ethical standards.

Direct Freight's actions to assess the effectiveness of its actions include:

- reviewing and auditing of suppliers and contracts of engagement;
- engaging with our suppliers ensuring their understanding of the Modern Slavery requirements when dealing with the Direct Freight Group and/or other contractors in the supply chain; and
- engaging with employees and reinforcing their roles and responsibilities in relation to Modern Slavery by providing employees on Intranet with Modern Slavery fact sheets, training material and as required onsite tool-box meetings.

Further information on Direct Freight's modern slavery strategy

Section 16(1)(g) of the Act

Direct Freight is committed to ongoing work on its systems and controls to assess and manage modern slavery risks. Direct Freight is committed to acting with integrity in all business dealings and relationships.

Direct Freight recognises the importance of developing and implementing a model of continuous improvement by assessing and addressing risks stemming from our business.

Some future commitments that Direct Freight is to continue to develop over the next financial year include:

- developing a supplier code of practice with information on modern slavery;
- continuing to build awareness amongst our suppliers of the Direct Freight's ethical business practice expectations;
- training our employees' awareness of how to identify risks of human rights issues and modern slavery;
- facilitating audits of our suppliers through a questionnaire and declaration the specifically addresses modern slavery related matters; and
- continue updating its supplier agreements to ensure they meet Direct Freight's ethical business practice expectations, including that suppliers comply with all laws related to anti-modern slavery and prohibited business practices.

Process of consultation across Direct Freight

Section 16(1)(f) of the Act

For consultation purposes, the Direct Freight reporting entities, Direct Freight Express and Direct Freight (Aust), have common directorships across reporting entities. This Statement has been reviewed and approved by the directors of both Direct Freight entities.

This Statement was developed and reviewed by executive/senior management group comprising representatives of both Direct Freight Express and Direct Freight Aust and approved by the respective corporate boards of each of the two reporting entities covered by this Statement.

The board of Direct Freight Express Pty Limited approved this statement on 10 December 2024.

The board of Direct Freight (Aust) Pty Ltd approved this statement on 10 December 2024.



Giuseppe Catania, Director
Direct Freight Express Pty Limited
Direct Freight (Aust) Pty Ltd
10 December 2024



Joseph Catania, Chief Financial Officer
Direct Freight Express Pty Limited
10 December 2024

