

# RÖHLIG LOGISTICS

## ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction

This Statement formalizes the commitment of Röhlig Logistics GmbH & Co. and its subsidiaries (“Röhlig Group”) to preventing slavery and human trafficking throughout its operations and activities worldwide, as well as to ensuring that procurement activities are performed in compliance with this commitment for the year ending 31 December 2021.

Röhlig Group is subject to several anti-slavery laws that consider Slavery and Human Trafficking as a criminal offence and a violation of fundamental human rights, such as the UK Modern Slavery Act 2015 and the Commonwealth Modern Slavery Act 2018.

Slavery is an umbrella term for activities involved when one person obtains or holds another person in compelled service.

Someone is in slavery if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an ‘employer’, usually through mental or physical abuse or threat of abuse
- Dehumanized, treated as a commodity or bought and sold as ‘property’
- Physically constrained or have restrictions placed on his/her freedom.

Slavery includes servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

Within the Röhlig Group, suppliers are subjected to a comprehensive vetting process – in order to verify the adherence to Röhlig Group’s policies, including the Suppliers and Business Partner’s Code of Conduct which articulates on our human rights and fair labor practices.

This Statement applies to all persons working for the Röhlig Group or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

## Structure, operations and supply chains

The Röhlig Group in Australia is represented by Röhlig Australia Pty. Ltd., an Australian proprietary limited company, wholly owned by Röhlig Logistics GmbH & Co. and registered at Moorebank Business Park, Unit 1, 2 Secombe Place, Moorebank, NSW, 2170, Australia.

Röhlig's business entails air freight, sea freight, and contract logistics. The Australian head-office is based in Sydney and this Statement applies to all Australian operations and global supply chains.

Röhlig procures services to allow the provision of freight forwarding and logistics, which includes engagement with subcontractors and agents around the globe. In order to mitigate the risk of modern slavery, child, forced and bonded labor and human trafficking in our operations and supply chains, we count on a Vendor Vetting process based on a comprehensive questionnaire that allows a risk-based assessment of local suppliers.

Throughout the vetting process, Röhlig suppliers commit to sustainable procurement practices, which include preventing slavery and human trafficking, amongst other misconducts. In addition, suppliers are screened against sanctions and restrictions lists in order to attest to the accuracy of the information provided.

## Risks of modern slavery practices in Operations and within the supply chain

### Operations

Röhlig Group acknowledges that some of its global operations are exposed to modern-slavery related risks. Services are subcontracted and sometimes sourced to and from agents throughout the world, where modern slavery is not subject to sufficient legal safeguards.

Röhlig in Australia engages in majority with domestic suppliers, based in Australia and whom adequate due diligence has been done on them thus limiting the geographical risk of facing modern slavery.

### Supply chain

As part of the vetting process, an internal risk-mapping is conducted by the Röhlig Group supply chain operations in all countries.

At this stage, we have identified one area that may present a risk of modern slavery in our direct suppliers of haulage and transport services.

Combatting this risk is enabled by our effective Supplier Vetting and Onboarding system that enforces that no Slavery or Human trafficking is taking place anywhere within our

internal or external supply chain. The same high Röhlig standards are expected from all Röhlig contractors, suppliers and other business partners.

Röhlig Group has zero-tolerance to slavery and human trafficking and is committed to acting ethically and with integrity in all its business dealings and relationships. Business partners are to comply with our Suppliers and Business Partner's Code of Conduct and to agree to uphold Human Rights internationally.

## Actions taken to assess and address risks, including due diligence and remediation processes

### Risk assessment

Röhlig established a working group which is supporting all countries in identifying legal and regulatory requirements to adhere to the Modern Slavery Act ("MSA"). Part of the support is to assess, review subcontractors, suppliers and agents, and to provide training to our Agents and other suppliers on demand.

We differentiate our suppliers into four groups:

#### Group 1

Australian companies with high-risk category services (e.g., uniforms, cleaning, temporary workers).

#### Group 2

Australian companies not related to Group 1.

#### Group 3

International companies, with low-risk rating on the Global Slavery Index ("GSI") and low geographical risk.

#### Group 4

International companies, with high-risk rating on the GSI, category of services, high geographical location risk.

### Supplier contracts

All Röhlig suppliers must adhere to and abide by the Suppliers and Business Partners' Code of Conduct which requires them to carry out their business activities with integrity, and to comply with the applicable laws, including Human Rights laws. It specifically prohibits Röhlig suppliers and business partners from using forced and child labor.

The Röhlig Suppliers and Business Partners' Code of Conduct contains clauses that form part of the supplier approval process which require our suppliers to comply with all applicable Anti-Slavery and Human Trafficking laws, including the MSA, and to maintain policies and procedures forbidding engaging in any activity, practice or conduct that would constitute modern slavery.

## Audit outcome and training

2021 Audit; In December 2021, the Röhlig Working Group sent Modern Slavery questionnaires and compliance forms to all Group Members. The audit found no significant risk of Modern Slavery. The outcomes of this audit included a need for increased supplier participation and a heightened accuracy of responses.

## Whistleblowing policy

Röhlig allows the reporting of concerns in an anonymous way, by anyone inside and/or outside the organization that has a grounded suspicion of any illegal or unethical activities, including, but not limited to modern slavery.

If suppliers or business partners are suspected to have violated any applicable laws, or any internal policy or contractual arrangements with Röhlig, the relationship can be terminated, or, depending on the case, Röhlig will work together with the relevant supplier to remedy the situation and put in place measures to ensure the non-occurrence of such violations.

Employees are expected to notify their manager or make use of the whistleblowing hotline if they believe or suspect that a conflict with this Statement has occurred or may occur in the foreseeable future.

## Implementation

Röhlig is committed to taking strong steps to ensure that our modern slavery policies, audits, and assessments are effective in identifying and removing any form of modern slavery within our operations, supply chain and those of our suppliers.

A special working group meet on a regular basis and is tasked with:

1. Reporting and making recommendations on the roll-out of modern slavery policies and procedures
2. Reporting on internal and external audits of supply chains, the tier or scope and frequency of the audit, and
3. Reporting and making recommendations to the Board on new modern slavery compliance measures.

## Training for stakeholders

Röhlig has commenced training for key stakeholders (including middle and senior management) of the business. Röhlig accepts that the success of its modern slavery compliance will be largely dependent on a well-educated workforce. To date, Röhlig believes the success of its modern slavery policies and procedures roll-out has been largely a result of a strong and committed global workforce seamlessly working towards well defined legal

compliance goals.

### Audit and monitoring

Röhlig regularly conducts audits through sending questionnaires and compliance forms to all Group members in order to monitor the implementation and effectiveness of various policies. By doing this, Röhlig can reinforce the implementation of the Anti-Slavery and Human Trafficking Statement at all levels.

## Assurance from Röhlig Group

Röhlig Group is committed to transparent operations and supply chains. Therefore, it continues to work with its partners to prevent modern slavery and any form of Human rights abuse within its global operations and supply chains.

To assist with this effort, Röhlig Logistics GmbH and its subsidiaries have filed this Modern Slavery Statement.

### Next reporting period

In 2022-23, Röhlig is committed to:

- Expand the relevant stakeholders in our Modern Slavery Steering Working Group
- Periodically distribute Modern Slavery questionnaires, record and assess the results, and support with any required mitigation
- Adopt a mitigation procedure for when modern slavery is detected in its operations, supply chains or its suppliers' supply chains.

This Statement was approved and signed by the Board of Röhlig Australia Pty. Ltd. in its capacity as the principal governing body of Röhlig Australia Pty. Ltd. on 29 November 2022.



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