

LSS
GROUP

Lionel Samson
Sadleirs
Group

Modern Slavery Statement

2021

Our Structure, Operations & Supply Chains

Lionel Samson Sadleirs Group (LSSG)* employs approximately 300 people and consists of the following businesses:

Sadleirs Logistics - Efficient road and rail services throughout Australia, providing reliable and trustworthy freight transportation with a safety first approach.

Sadleirs Packaging - A provider of custom packaging solutions and industrial supplies to Australian and New Zealand industries.

Sadleirs Resources - Expert logistics support to the resources industry, including linehaul freight services.

Sadleirs Global Logistics - A complete global freight forwarding service, providing worldwide sea and air service, professional customs management and specialist divisions for critical cargo, projects and valuable cargo.

LSSG is headquartered in Perth, Western Australia, with operations in Sydney, Melbourne, Brisbane, Adelaide and New Zealand.

While we only operate in Australia and New Zealand, we source goods and services from a wide variety of suppliers, both in Australia and overseas, to support our Group's operations.

As an indication, procured goods range from prime movers, diesel fuel and vehicle/trailer parts, to packaging and industrial supplies, IT software/hardware, uniforms and office supplies.

Outside of Australia, our extended supply chains are primarily located in Asia and, to a lesser extent, Europe.

We intend to progressively develop a supply chain map to assist in our continuing assessment of modern slavery, human rights and other procurement risks.

* 'Lionel Samson Sadleirs Group' means R.C. Sadleir Pty Ltd (ABN 65 008 667 052) and its related bodies corporate. The reporting entity is R.C. Sadleir Pty Ltd, as the parent company in the Lionel Samson Sadleir Group. Unless expressly stated otherwise, this Statement applies to R.C. Sadleir Pty Ltd and its subsidiaries as a whole. During the reporting period, we engaged and consulted with all our operating subsidiaries in the development of this statement and in the assessment of all relevant risks and implementation of associated controls.



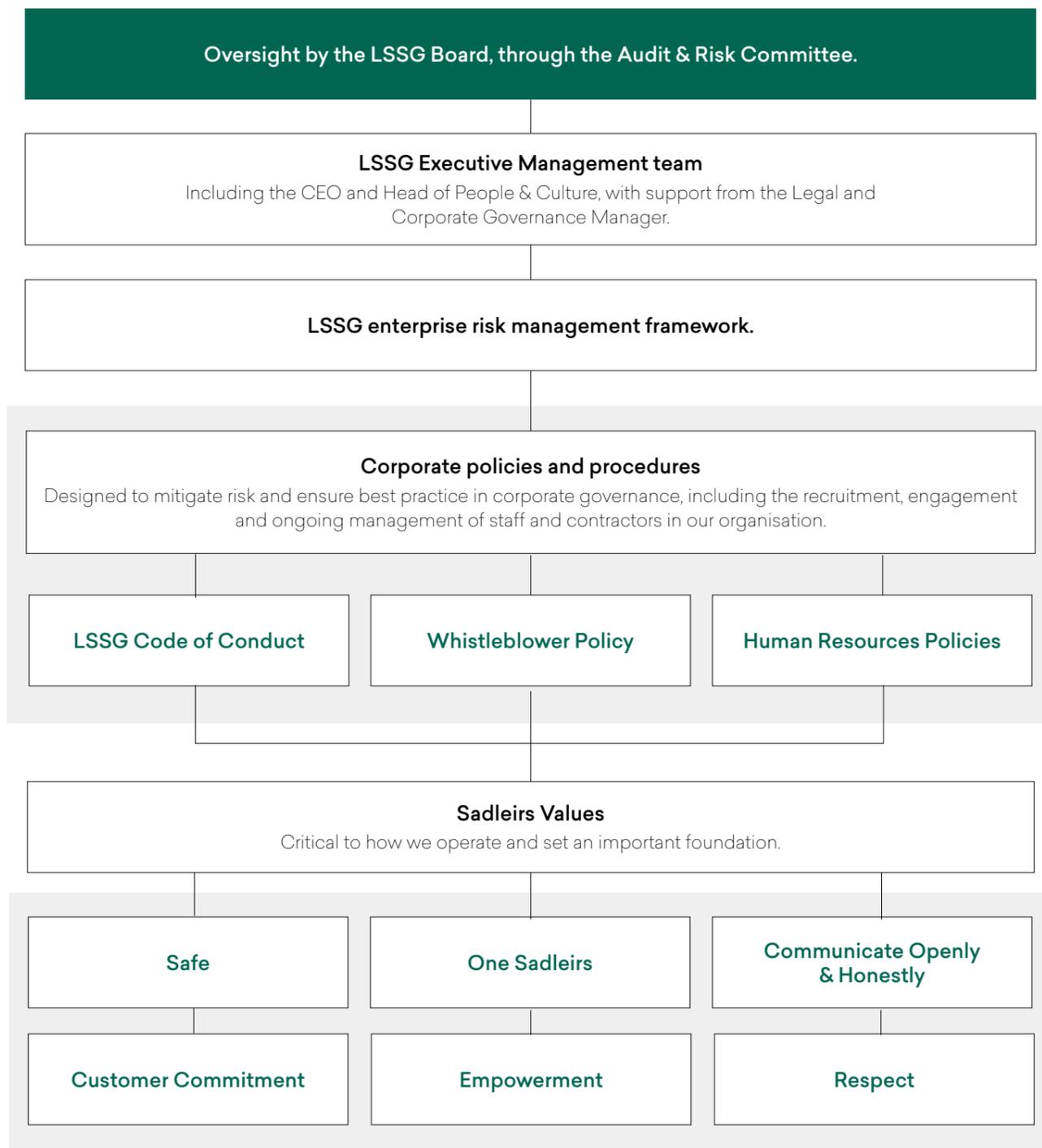
Equipment, People and Assets



Our Governance

The Lionel Samson Sadleirs Group has a well developed corporate governance framework, to address risk and compliance issues, including modern slavery and human rights.

The framework includes the following:



Assessment & Mitigation of Modern Slavery Risk

The Group's enterprise risk management framework provides a key mechanism for the analysis, assessment and management of modern slavery and human rights risks.

We will continue to use this framework to identify risk factors relevant to our Group, including the higher risk supply chains; industry, workforce and geographic indicators; the effectiveness of existing controls; and,

importantly, potential additional controls we can implement to reduce the relevant risks.

We have been alert to the increased risks caused by the disruptive effect of Covid-19 on the global supply chain. We have worked closely with our suppliers to maintain continuity of appropriate supply relationships and regular communication.

Due Diligence & Assurance

The Group recognises that additional due diligence during supplier on-boarding and as part of a formal ongoing assurance programme, assists in the identification of risk. Where appropriate, this may require follow up monitoring and management, in accordance with our risk management processes.

We have established reporting procedures where our people, suppliers and others can report misconduct, including modern slavery or human rights violations. They may also do so anonymously, pursuant to our Whistleblower processes as outlined on our website. Any matters so reported are investigated and addressed.

We also maintain internal grievance and dispute resolution procedures which enable our people to raise and escalate any concerns they may have, including to our People & Culture function or the Executive Management team.

In the last year we have not identified or received notification of any potential incidents of modern slavery in our operations. We have also ceased our use of seasonal labour, following divestment of our winery operations.

Measuring Effectiveness

Assessing the effectiveness of actions in reducing modern slavery and human rights risks can be challenging. In LSSG, both incident reporting and risk management review reporting occurs within the structure of our broader governance framework and,

as appropriate, such matters are escalated accordingly. Key performance indicators involve our assessment of control effectiveness and our ongoing progress in the implementation of additional controls – as identified in our risk management reviews.

Training & Capability Building

Our Values and core policies are communicated to our people on induction and on a regular basis.

With regards to our specific processes and controls to mitigate modern slavery and human rights risks, specialist support is provided to the Group by our People & Culture and Legal & Corporate Governance functions.

We recognise the need to further build the awareness and capability of all our employees, to continuously strengthen the Group's response to the relevant risks.

Over the previous year we have placed an additional focus on enhancing the values driven culture of our organisation, as well as staff training and development.

As industry awareness improves, we also look forward to working with similar organisations, to collaborate in the objective of ending modern slavery.

Looking Forward



We will pursue continuous improvement in our efforts to reduce the risk of modern slavery, and any other infringement of human rights, in our business and the sectors in which we operate.

This will include a focus on:

1. Enhanced due diligence

Implementing a standardised and risk based assessment process for new and existing suppliers.

2. Capability building

Developing additional training for relevant managers and staff in the identification, management and reporting of modern slavery risks.

3. Systems and processes

Implementing enhanced enterprise risk management and governance, including ongoing review and updates to policies and procedures.

4. Customer and supplier engagement

Continuing to work with our valued customers and suppliers to jointly reduce the risk of modern slavery and any other infringement of human rights.

5. Evaluating our progress

Regularly review the effectiveness and progress of our efforts.

This Statement was approved by the Board of the Lionel Samson Sadleirs Group.

Signed,

David Cole
Chief Executive Officer



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