



AAW Global Logistics Modern Slavery Statement

FY2022

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Barry Misiurak
Managing Director



Andrew Maguire
Deputy Managing Director

Message from the Managing Director and the Deputy Managing Director

Modern slavery in supply chains remains a complex and serious problem that has become more prevalent as a result of Covid 19 and rising supply chain prices. While acknowledging that modern slavery is difficult to identify in practice, AAW will continue to actively participate in the global initiative to end all forms of modern slavery by taking steps to protect human rights and employees' freedoms within our operations and in our supply chain.

For this reporting period, we continued to evaluate our operations and supply chain and undertake continuous improvement initiatives to raise awareness and mitigate the risks of modern slavery occurring within our operations and supply chain.

We are pleased to issue our third Modern Slavery Statement on behalf of our Board of Directors and employees, providing information on our progress in assessing and mitigating the risk of modern slavery in our operations and our supply chain in FY22.

Purpose of the Statement

AAW Global Logistics (AAW) recognises 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.

Understanding Modern Slavery

Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine personal freedoms. Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

It does not include practices like substandard working conditions or underpayment of workers, though these practices are also harmful and may be present in some situations of modern slavery.

Modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible businesses, and can pose significant legal and reputational risks to entities.

Entities have a responsibility to respect human rights in their operations and supply chains, as outlined in the *United Nations Guiding Principles on Business and Human Rights*. This includes taking steps to assess and address modern slavery risks.

In committing to take action to combat modern slavery in our operations and supply chains, AAW can protect against harm to our business and our clients' businesses and improve the integrity and quality of our supply chains, and our client's supply chains.

Our Structure and Operations

AAW Global Logistics Pty Ltd (AAW) (ABN: 14 007 257 865) was first established in 1983 as an international freight forwarder. With our Head Office in Melbourne, offices in Brisbane, Sydney, Adelaide, Fremantle, Auckland, our company employs almost 90 people. Our Company has expanded over the years to provide a diverse range of services through its specialised divisions.



International Freight Forwarding – Global Coverage: Sea & Air

AAW Global Logistics (AAW) is a Freight Forwarding company – offering a variety of expertise throughout Australia / New Zealand & Internationally: Freight Forwarding (Export & Import, Sea & Air, Consolidation Products, Reefer Focus), Customs Brokerage, Warehouse & Fulfilment, 3PL Solutions, Supply Chain Solution (Lighthouse)



Domestic Australian Coastal Cargo Movements & Road / Rail services

Coastalbridge specialises in Sea, Road, and Rail movements of dry and refrigerated cargo between all major Australian cities. Coastalbridge's service network extends across Australia including North Queensland, Tasmania, and Northwest WA. Coastalbridge can also offer bespoke door-to-door logistics solutions



ISO Tanks / Flexi-tanks & Specialised 'Dangerous Goods' Forwarding

HOYER Logistics Australia: provides specialised logistics services to the Australian and New Zealand domestic markets. This includes fleet management, domestic transportation of chemical products, foodstuffs, and cryogenically liquefied gases. Logistics Services are provided in addition to the leasing of ISO Tank Containers and IBCs. Full-service Flexi-tank operations are also provided by the team

HOYER Global Agency Australia: provides full end-to-end international services for the movements of ISO Tanks and Flexi-tanks to worldwide destinations



Regional Australia Specialisation – Fresh Produce and General Cargo

Regional Shipping Services (RSS) specialise in servicing the logistics needs of Regional Australia. With dedicated experienced staff, RSS has technical expertise in Cold Chain logistics and understands the unique challenges facing the many industries in key regional areas of Australia



Specialised Project forwarding, including full vessel charters

AAW Project Logistics is a team of 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. Services include Break & Containerized Cargo, Heavy Lift & Modular Cargo, Transport Engineering, Project Management Door to Door, Part & Full Vessel Chartering, Multimodal Freight Solutions, Turnkey Industrial Projects, and Project Logistics & Consultancy



Supply Chain Management & Logistics Services

PIL Logistics Australia (PILLA) is a boutique Freight Forwarder, with broad reaching global integrated logistics capabilities. PILLA seeks to build long term partnerships delivering customised services and value for Blue Chip Organisations and specialised SME's markets: FMCG, Agriculture, Chemicals, Raw Materials and Commodities Trading

Our People



In FY2022, AAW's workforce, including casual employees and independent contractors, increased to around 85 employees across our operations.

As part of our HR Policy, we use only reputable recruitment firms and follow all applicable laws and regulations.

We regularly review our recruitment procedures and recruitment providers to ensure a transparent and fair hiring process that can assist HR personnel to select the right candidate based on merit and job fit, as well as to avoid discriminatory behaviour at all stages of the overall recruitment process.

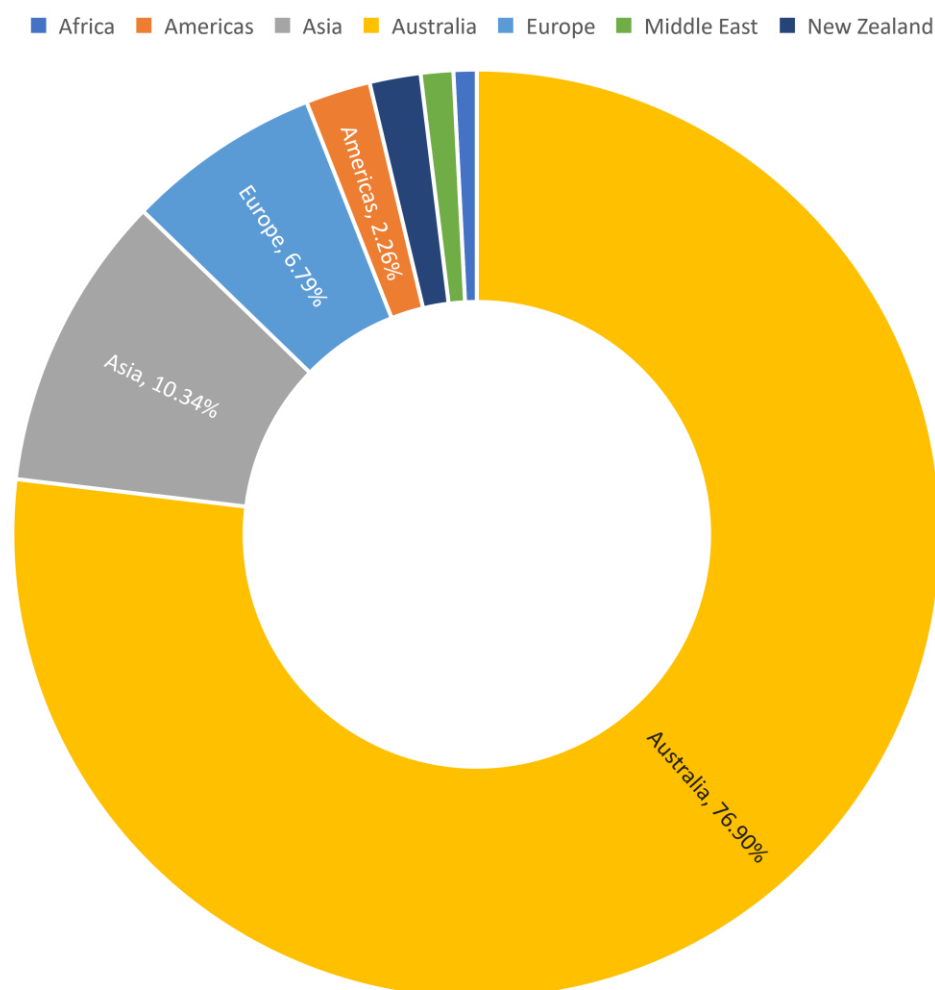
As an employer, AAW takes steps to ensure that all new team members are appropriately qualified and authorised to work in their respective countries. Remuneration is determined by taking into account the skills and experience required to safely perform the role, current market salary data, any applicable Modern Awards, and parity with colleagues performing the same or similar role regardless of any protected characteristics. Salaries are reviewed on an annual basis to ensure that employees are compensated fairly and appropriately for their time and efforts, as well as their skill development.

AAW recognises that our most valuable asset is our people, so we prioritise employee welfare by encouraging and promoting a supportive work environment, offering well-being programmes and workplace flexibility. Cultivating a culture of continuous learning in our workplace has become a business imperative. Our primary HR goal is to provide people with the skills, tools, and support they need to do their jobs, as well as opportunities to advance their careers.

All our employees have access to grievance channels through which they can express their concerns, through WHS incident reporting, Working Together Policies, and our whistleblowing mechanisms. AAW is committed to protecting employees who report wrongdoing and will ensure that all disclosures made in accordance with whistleblowing procedures are treated confidentially and without fear of retaliation.

Our Supply Chain

Location of Suppliers



As an international freight forwarder, we have established business relationships with suppliers locally and around the world, in order to provide our customers with access to the highest levels of service and efficiency in the transit of their goods. At AAW, we understand the importance of human rights and dignity, and are committed to working with likeminded businesses, so that we do not intentionally contribute to modern slavery as we carry out our role as a player in the international supply chain. AAW supply chains for this reporting period include:

- Services that contribute to its operations such as the cleaning, catering, security, office equipment maintenance, utilities, IT, telecommunication that service AAW's offices. These service providers are located in Australia, New Zealand and United States.
- Services that contribute to the services AAW offers to clients, including freight forwarding, transportation via air, sea, road and rail, supply chain management, shipping, customs, and quarantine clearance.
- Suppliers of goods to AAW that are not for resale to our clients, such as suppliers of equipment, packaging materials, office stationery, PPE, promotional products. These suppliers are located in Australia and New Zealand.
- Suppliers of professional services to AAW that are not for resale to our clients, such as suppliers of education and training, consulting, insurance, and financial services. These suppliers are located in Australia, and New Zealand.
- Agents, freight forwarders, carriers, warehousing, logistics, and transportation companies, with 76.90 % based in Australia and 23.10 % based in New Zealand, Asia, Americas, Europe, Middle East, Africa, to manage the company's import and export of our customers' products to and from Australia.

Risks of Modern Slavery in our Operations

OPERATIONS RISKS

In FY2022, AAW has continued to operate solely in Australia and New Zealand, where there is less of a geographical risk of modern slavery. We acknowledge that modern slavery exists in both countries, particularly in relation to vulnerable workers, migrants, and/or workers in low-skilled positions or in casualized or insecure forms of work.

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. However, for the third year in a row, our ability to conduct site audits was affected, and as a result, we continued to rely on alternate monitoring approaches such as virtual site inspections.

LABOUR RISKS

During this reporting period, AAW continued to engage workers as permanent full time and part time, temporary and casual employees. Our employees are based in Australia and New Zealand and perform office duties. In relation to our operations in Australia:

- 3.5 % of our employees were covered by a Modern Award
- 1.2 % of our employees are engaged as a casual employee
- We engaged a total of 3.5 % workers by way of independent contracts

Whilst we do acknowledge that modern slavery can occur in Australia, 93 % of our employees are professional and skilled workers, which reduces the risks of modern slavery.

Recruitment Risks

In relation to deceptive recruitment practices, we acknowledge that modern slavery risks are prevalent in this area, even in Australia. In FY2022, AAW continued to engage temporary workers through labour hire agencies, but only through agencies who are members of Australian and New Zealand recruitment industry associations such as corporate AHRI and RCSA memberships. Labour hire providers are also required to be licensed in several Australian jurisdictions. Workers engaged through labour hire 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. This reporting period, employees engaged through labour hire providers were given a copy of AAW's Whistleblower Policy, which includes a mechanism for reporting modern slavery as part of their induction, as well as access to health and safety reporting mechanisms and other training and information as appropriate to perform their role.

AAW uses the services of a reputable recruitment agencies on occasion to assist with temporary and permanent appointments, and we are aware of the inherent risks of outsourcing recruitment. The recruitment agencies we engage do not charge recruitment fees to prospective or successful employees.

As we only use reputable recruitment agencies, the risk of modern slavery occurring in this element of our operations is low. As part of our last reporting period's continuous improvement objectives, we formally implemented a checklist into our recruitment process that allows us to mitigate against recruitment agencies charging recruitment fees to potential or successful personnel.

Risks of Modern Slavery in our Supply Chains

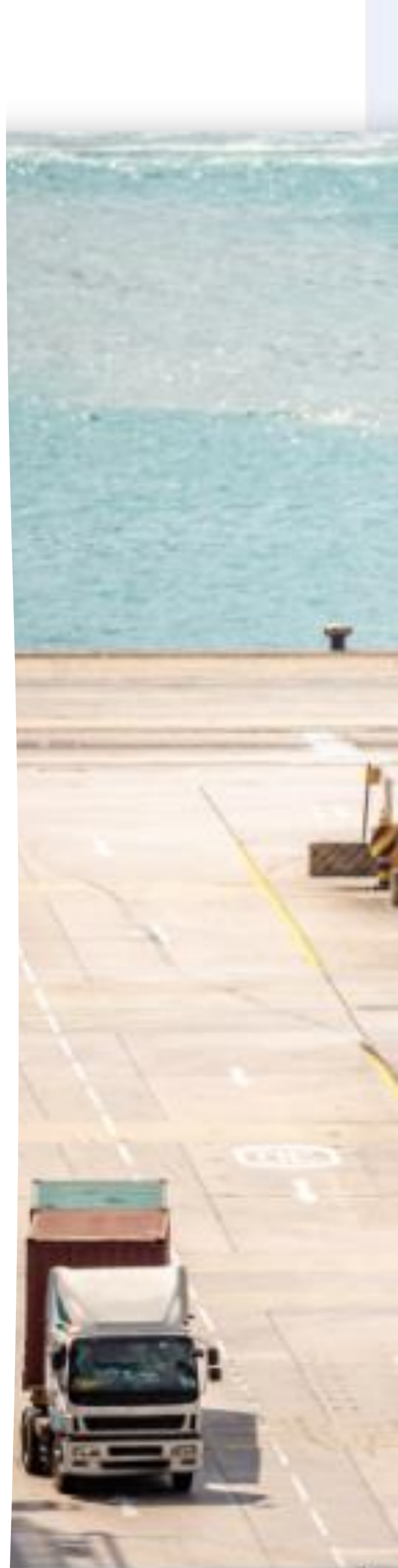
AAW utilises cleaning, catering, and security services for our Australian and New Zealand offices through contracting arrangements with companies who supply these services. While the workers are based in Australia and New Zealand, AAW recognises that these industries have a higher risk of modern slavery even within these countries. Workers may come from vulnerable groups, such as low-skilled workers and those from migrant, low-income, or culturally and linguistically diverse backgrounds. If not managed properly, this increases the risk of potential modern slavery practises.

AAW uses IT support services for our operations, which are provided by a contracting arrangement company. While the companies we work with are based in Australia, their employees may be located in other countries, posing a geographical risk of modern slavery. AAW has limited visibility into this supply chain, which will be looked into further in future reporting periods.

AAW procures giftware promotional products, office supplies and uniforms which may be manufactured in various locations outside Australia, however they are purchased locally in Australia and from reputable office supplies stores and promotional merchandising suppliers. AAW does not have much visibility over this supply chain, however noting that supply chains related to uniforms and branded products may have a high risk of modern slavery, these supply chains will need to be investigated further.

AAW engages freight forwarders and transportation companies based in Australia, New Zealand, Asia, Americas, Europe, Middle East, Africa, to manage the importation / exportation of products to and from Australia for the company and its clients. Due to the lengthy and complex nature of international transportation supply chains, there is a risk that modern slavery occurs (or is at a higher risk of occurring) in such supply chains which may not be easily assessed or addressed by AAW.

AAW acknowledges that, as a link in the global transport network, our supply chains are lengthy, and we have limited visibility and minimal ability to exert control, particularly in circumstances where key suppliers are far larger than AAW. Some of these larger suppliers have made public commitments regarding human rights and modern slavery, and many are likely to be reporting entities under the Act. Notwithstanding this, in future AAW will endeavour to leverage its longstanding business relationships with larger entities in this industry with a view to encouraging a similar focus on modern slavery.





Our Actions

Policies and Standards

AAW has taken steps to address risks of modern slavery within our business and supply chain through implementation of policies and procedures. AAW will continue to build on this, and any new policies that are implemented will be reported in subsequent reporting periods. The most important policies and procedures that we have in place, as well as the steps we have taken to mitigate the risks of modern slavery, are outlined below:

✓ ***Bullying, Harassment, and Discrimination Policy***

AAW is committed to preventing bullying, harassment and discrimination and has implemented policies that reflect the company's commitment to provide a safe and healthy work environment. Workplace bullying and harassment will not be tolerated under any conditions. This policy outlines AAW's commitment to a safe workplace and is intended to ensure, to the greatest extent possible, that employees are not subjected to any form of bullying, harassment, or discrimination while at work. This policy will be updated in the next reporting period to reflect changes to the Fair Work Act.

✓ ***Whistleblower Protections Policy***

We are committed to promoting a culture of open and honest communication, corporate compliance, and governance. As part of that commitment, AAW has had a Whistleblower Protections Policy in place for a number of years now. This policy serves as a confidential reporting mechanism through which people within and outside our business can register concerns or file reports about any suspected misconduct or an improper state of affairs including unethical, illegal, or other inappropriate conduct. The policy explicitly mentions modern slavery and has been made more accessible to the community and workers of our suppliers (and their suppliers) for the aim of reporting modern slavery risks or concerns directly to AAW so that they can be addressed and resolved. The Policy is available to all employees via our intranet and employee handbook, and to the general public via our website. During the reporting period, we did not receive a Whistleblower report.

✓ ***Flexibility at Work Policy***

To continue to support our employees to better balance work and their personal life and responsibilities, all employees who have completed their training period can access flexible arrangements through the Flexibility at Work Policy. This initiative builds on our commitment to improve the retention of our staff and their well-being, support diversity and continue to build on our people-first strategy. This reporting year, we updated the policy and created a Work from Home checklist to help us assess the risks associated with working from home. The checklist was distributed to all employees and will be completed on a regular basis to continuously evaluate the home environment as a safe place to work.



✓ **Working Together Policy**

The Company respects every employee's right to be treated with dignity, respect, and courtesy. Employees should be able to come to work in an environment that reflects harmony, safety, and security, and that is free of harassment and discrimination, and the Company will make every effort to ensure that this happens. As part of this commitment, AAW reviewed and updated our Working Together Policy to ensure that the Company provides a safe and healthy working environment. The Policy is available to all employees via our intranet and is referenced in our Employee Handbook.

✓ **Equal Employment Opportunity (EEO) Policy**

The Company is committed to providing equal opportunities for all applicants and employees of the Company, in all areas of employment, and in the terms and conditions of employment, regardless of sex, race, marital status, political or religious beliefs, or other protected characteristic. Company policy requires that Equal Employment Opportunities will be provided in all aspects of employment including recruitment, promotions remuneration and other terms and conditions of employment.

✓ **Modern Slavery Policy**

AAW is committed to protecting our employees' rights and maintaining the highest human rights, ethical, and modern slavery standards. As a result, during this reporting period we developed our Modern Slavery Policy, which affirms the Company's commitment to contributing to the abolition of all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practises within our supply chains and operations. The Modern Slavery Policy is published on our intranet for our employees, and on our website for the outsourced operations team in the Philippines and the general public. In FY22, AAW did not receive any reports of modern slavery in our operations or supply chains.

❑ **Employee Code of Conduct Policy**

We drafted an employee code of conduct policy this year. This is an important document that explains to employees the standard of behaviour expected of them, and how the company intends to conduct business. It aids in the avoidance of ambiguity in staff expectations and the prevention of inappropriate behaviour. It also fosters a positive ethical culture in which all employees are treated equally and with respect. This policy will be communicated to new and existing staff during the 2023 reporting period.

❑ **Hours of Work Policy**

This year, we began developing an Hours of Work Policy to provide a guideline for the provision of fair and equitable working hours, work allocation, and work arrangements, as well as to ensure that Employees are aware of, and able of fulfilling, their responsibilities in relation to their employment with the Company.



✓ **Employee Handbook**

The handbook is a valuable tool for developing, strengthening, and changing our organization's culture, and it reflects our commitment to the promotion and protection of human rights based on the principles of dignity, equality, and mutual respect. It includes standards, policies, and employee expectations, in order to comply with Australian and New Zealand workplace regulations. We amended the Employee Handbook this reporting year to incorporate information regarding modern slavery and AAW's commitment to tackling the risks of modern slavery in its operations and supply chains.

☐ **Culture and Pulse surveys**

AAW's objective in past reporting years was to implement an employee survey in order to gather anonymous feedback from our employees to assist AAW in identifying and addressing risks of gender disparity, harassment, coercion, bullying, control, or exploitation within our operations. This initiative has been postponed twice due to the pandemic, but we made headway this reporting year by conducting a brief survey with a small group of employees and adopting a survey for all new employees to provide feedback regarding their recruitment experience, and first 3 months of employment.

Recruitment

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 Commercial Director (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).

Internship

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. During the reporting period, AAW did not provide any internships or work experience placements.



Visits To Outsourced Team in The Philippines

Due to Covid and travel restrictions, our team has not been able to travel and conduct site visits in the last two years.

As a result, we continue to meet with our outsourced team representatives on a regular basis via online meetings to discuss any issues they may be experiencing.

These meetings occur with the entire outsourced team, and cover a wide range of topics, including the impact of lockdowns, the need for IT or other support, and employee well-being.

With the easing of restrictions, we anticipate travel and site visits will resume in FY23.

Australian Trusted Trader

AAW is an accredited Australian Trusted Trader, which means we continually take steps to ensure we meet the qualification criteria of the *Customs Amendment (Australian Trusted Trader Program) Rule 2015*, and complete annual declarations to confirm this. Relevantly in the context of modern slavery, we:

Have physical security measures in place to control access to goods stored, and secure the goods against unauthorised movement, alteration, or interference during movement of the goods into or out of our premises and while goods are stored in those premises; and

Have measures in place to keep goods secure and prevent alteration or interference during transportation and reconcile goods moved into or out of our premises with commercial or other documentation

Actively identify and address specific vulnerabilities or risks to our international supply chain and take measures to mitigate and review the vulnerabilities and risks through a security risk assessment.

ISO 9001 Quality Management System

During the reporting period, AAW implemented the ISO 9001 Quality Management System and successfully completed the external certification audits.

The processes and procedures implemented as part of our ISO certification will assist AAW in measuring compliance with the Modern Slavery Act, procurement procedures, evaluating risks, and ensuring that continuous actions are taken to address modern slavery, as well as measuring the effectiveness of its actions.



Outsourcing



**Quality
ISO 9001**



Due Diligence

As part of our commitment to maintain AAW's ethics and integrity in business practices, we continue to monitor and review our internal processes and policies.

We follow our responsible recruitment practises, 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.

With the assistance of our consultants, we developed a Supplier Risk Assessment process in FY20 to assist us in identifying and managing the risks of modern slavery in our supply chain. During this reporting period, we used the same process to evaluate our Tier 1 Suppliers.

We continued to work on revising our procurement procedure, which will ensure that when we engage these service providers, they have been pre-screened and have undergone due diligence procedures. AAW is looking for ways to incorporate ethical sourcing into our procurement practises and developing a new Procurement Policy and Supplier Code of Conduct. We anticipate that the new procedure and policies will be implemented and adopted during the upcoming reporting period.

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. 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:

- AAW has agency agreements with our strategic partners, and offshore processing services, and prior to entering into these agreements, it conducts financial, human resource, and regulatory due diligence. This reporting year, we modified our existing agreement to incorporate provisions regarding modern slavery and communicated this change to our offshore processing service providers. We also started updating our agency agreements for our key agents. We will begin communicating the new agreement in the next reporting year.
- AAW has vendor agreements with overseas and 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. AAW has begun to explore for a solution to transition existing vendors to the new vendor agreement, which will continue into the next reporting period.

Training of Staff

Last reporting year, we engaged external providers to develop a Modern Slavery Training Program to increase awareness among our staff. The training is intended to improve the understanding of human rights and modern slavery responsibilities, as well as our approach to potential risks.

Due to technical issues and the need to refine the training material, the formal training was delayed to the first half of the FY23 financial year. The training program will be mandatory for all employees including our outsourced team.

This reporting year, our Group Risk & Compliance Manager attended a workshop on Implementing Effective Modern Slavery Grievance Mechanisms hosted by Global Compact Network Australia. The workshop provided:

- Technical guidance on the expectations of businesses in implementing grievance mechanisms as outlined in the UN Guiding Principles on Business and Human Rights (UNGPs) and the Australian Modern Slavery Act 2018 (Cth).
- Practical guidance on how to design and implement grievance mechanisms that meet the UNGPs' effectiveness criteria.
- Workshop exercises that respond to a hypothetical modern slavery scenario, such as designing and peer-reviewing an effective grievance mechanism.
- Networking opportunities with other practitioners and technical experts.

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, Group Risk & Compliance Manager, 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.



Assessing the Effectiveness of our actions

AW 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;

TABLE 1 AAW's framework for evaluating the efficiency of our actions

DURING COVID

The COVID-19 pandemic continues to have a significant impact on our operations and supply chain in FY22, and AAW remains vigilant to ensure that our employees work in a safe and healthy environment.

- Our Crisis Management Team continues to review the risks while ensuring business continuity.
- Our Covid Management Plan is being reviewed and updated on a regular basis in accordance with the most recent health advice and health and safety obligations, and any important changes are being disclosed to our staff.
- We continued to provide work flexibility to all our staff.
- AAW continued to work closely with our offshore partners in the Philippines to support their remote working model.
- Our Paid Pandemic Leave Policy, which was implemented in March 2020, remained in effect for all employees, including casuals, new employees, those with minimal sick leave accrual, and those with pre-agreed work commitments, providing up to 10 days of paid leave should they or a member of their family require care, become sick with the virus, but have insufficient personal leave available to cover their absence.



Consultation

AAW is managed as an integrated group with well-structured policies and procedures that are designed to be applied to all entities. In accordance with this model, our consultation process included engagement with:

- our Modern Slavery working group which includes representatives from Finance, Human Resources, Procurement, and Risk and Compliance who are shared resources working across the entities and business groups identified in this statement under the heading “Our Structure and Operations”; and
- each of the entities owned and controlled by AAW.

****This statement was prepared in consultation with each subsidiary and controlled entity covered by it, and it was reviewed and approved by the Board of Directors on December 13, 2022.*



Continuous Improvement

AAW is committed to continually improving our approach to reducing the risk of modern slavery practises in our supply chains and operations and has established the following priorities for FY23:

- Continue to review our existing Policy Framework.
- Continue working on our Procurement Policy and Procedure and Code of Conduct for Suppliers Policy and look at implementing it in FY2023. Implementation of procurement procedure will include supplier risk assessment and surveys, development of preferred supplier list.
- Deliver the developed modern slavery training to all our staff to increase their understanding and awareness.
- Deliver the employee pulse survey to all employees.
- Ensure that all new medium and high-risk suppliers undergo AAW's Supplier Risk Evaluation Process.
- Continue process of transitioning existing vendors to new vendor/agency agreement.
- Publish Modern Slavery Statement by 31st of December each year outlining the steps we have taken to address modern slavery risks.



Review of
Policies



Supplier Code
of Conduct



Training &
Awareness



Compliance and
Due Diligence



Review of
Contracts



Compliance
with the Act

A A W

GLOBAL LOGISTICS

ABN 14 007 257 865

Head Office

Street Address

Level 1, 102 Dodds Street
Southbank Vic 3006

Postal Address

P.O. Box 952
South Melbourne 3205

Telephone

61-3-9611 6860

Fax

61-3-9699 8938

Website

www.aawglobal.com.au