

Campbell Transport

Modern Slavery Statement (FY24)

Campbell Transport opposes modern slavery and is committed to operating its business lawfully, ethically and in a manner respecting human rights. This is the inaugural Modern Slavery Statement made under section 13 of the *Modern Slavery Act 2018 (Cth)*, and sets out our plans to identify and mitigate any potential modern slavery risks in Campbell Transport's operations and supply chains.

Reporting Entity

This Modern Slavery Statement has been prepared for David Campbell Transport Pty Ltd ACN 151 523 090 as trustee for the David Campbell Trust located at 70-74 Frederick Street, Albany, WA 6330 (**Campbell Transport**).

Structure

Campbell Transport is a family owned business established in 1997. The David Campbell Trust is a discretionary trust, and David Campbell Transport Pty Ltd is a private, limited liability company. Campbell Transport does not own or control any other entities. Our workforce is employed directly and through specialist providers, including Campbell Transport's associated entity, Campbell Personnel Pty Ltd ACN 658 504 164 (**Campbell Personnel**).

Operations and Workforce

Campbell Transport is a logistics solutions provider delivering a comprehensive range of road transport, distribution, warehousing, bulk material handling and project services to the resources and agriculture sectors in Western Australia. Campbell Transport's workforce of more than 625 people work throughout the state of Western Australia.

Campbell Transport has a transport fleet of more than 154 trucks, and hundreds of trailers and other vehicles, and specialised heavy equipment for the delivery of mining services and ship loading services. We have an extensive network of offices and depots located in the Perth metropolitan area, and the Great Southern, South West, Mid West, Goldfields, Murchison, Pilbara and Kimberley regions of Western Australia.

Supply Chains

Our suppliers provide a range of goods and services, including vehicles, trailers, plant and equipment, tools, parts, chemicals, fuel, oil and gas, stationery, PPE, labour and equipment hire services, information and technology hardware and software, construction and building services, cleaning and maintenance services, courier and post services, professional services, airline and other travel services, telecommunications and staff training services.

Modern Slavery Risk in Operations and Supply Chains

Operations Risk

All of Campbell Transport's employees are employed directly by Campbell Transport or Campbell Personnel in accordance with Australian laws, and therefore we consider the modern slavery risk presented by our employees is very low.

About 10% of Campbell Transport's workforce is engaged indirectly through Australian owned and based labour hire providers. At the date of this statement, less than 2% of our employees are sponsored by us on working visas and were engaged through an Australian owned labour hire company based overseas. We have identified overseas recruitment services as a high risk industry that requires our scrutiny and attention.

Supply Chain Risk

The goods and services procured by Campbell Transport are sourced almost exclusively from Australian based suppliers.

During FY24, more than 98% of new trucks and 100% of new trailers purchased by us were manufactured in Australia. Save for the one exception noted in the next section, during FY24, all other goods and services in our supply chain, including heavy and light vehicles, were sourced from local Australian based suppliers, many of whom conduct their own due diligence to investigate modern slavery risks in their supply chains and publish their own Modern Slavery Statements.

The modern slavery risk associated with our Tier 1 supply chains, procurement and sourcing of goods by Campbell Transport is assessed as being low, but we acknowledge the majority of these suppliers are distributors of products manufactured by other businesses with often complex supply chains.

Actions Taken to Assess and Address Modern Slavery Risks

We have undertaken a number of actions to control the risk of modern slavery within our operations and supply chain.

We have long-term commercial relationships with many of our suppliers of goods and services. We know their businesses, have visited their premises and engage in conversations with their managers.

We assess our suppliers for modern slavery risk, and scrutinise high risk suppliers through targeted enquiries. We are taking measures to map our supply chains to identify high risk Tier 2 suppliers so that we can effectively identify and put in place strategies to mitigate risks of modern slavery.

On one occasion during FY24, Campbell Transport purchased two large items of equipment directly from a single overseas supplier. Prior to finalising the transaction, two of our senior managers travelled to the supplier's location to inspect the equipment and the supplier's manufacturing premises, and meet the supplier's key personnel.

Campbell Transport requires that labour hire providers compensate personnel in accordance with applicable modern awards and enterprise agreements. We also contractually require our

local labour hire providers to comply with the requirements of all laws, including Work Health and Safety laws, employment laws and modern slavery laws.

To limit risk associated with international recruitment services, we engage a single recruitment company, based in Western Australia and overseas, to recruit and engage all international workers, and we have put in place contractual obligations to prevent the risk of exploitation of workers (including requiring compliance with all local laws) and to allow us to scrutinise their operations and practices to ensure that our requirements are being adhered to. We also send senior personnel overseas to meet our international labour hire provider and inspect their premises and meet prospective candidates.

Assessing effectiveness

We will continue to work with our Tier 1 suppliers to engage in meaningful dialogues to assess whether our expectations and standards have been upheld.

We continually monitor and review our internal policies and procedures to ensure their effectiveness. By analysing the information that we obtain through mapping our supply chains, we will be in a position to put in place robust procedures to mitigate risks in our Tier 2 supply chains.

We have in place systems to check compliance with laws by our overseas labour hire providers and will continue to review and assess the effectiveness of those systems.

We will continue to refine and enhance our approach and processes in relation to modern slavery risks, ensuring we continuously improve our practices moving forward.

Consultation

Campbell Personnel shares the same directorship as Campbell Transport and was consulted in the development of this statement to ascertain the modern slavery risk in operations, and to ensure that information provided in this statement is true and correct.

This statement was approved by David Campbell as the Sole Director and principal governing body of David Campbell Transport Pty Ltd ACN 151 523 090 as trustee for the David Campbell Trust.



David Campbell
Sole Director