



# Modern Slavery Statement

F.Y. 2024



# Message from the Managing Director

## Reaffirming Our Commitment to Combat Modern Slavery in FY2024

Modern slavery persists as a pressing global challenge, affecting millions of people worldwide across diverse industries and regions. Recent reports indicate an alarming increase in vulnerability, driven by global instability, climate displacement, and economic pressures. This stark reality reminds us that combating exploitation demands continuous vigilance and action.



Our Modern Slavery Statement for FY 2024 builds upon our commitment to ethical practices and the protection of human rights. It provides a transparent overview of our efforts, including the steps we have taken to mitigate risks, enhance awareness, and maintain robust systems for safeguarding against exploitation. This year, we have strengthened our Risk Assessments and continued to refine our processes to identify and address vulnerabilities, ensuring alignment with global best practices. Targeted programs for employees and partners remain a cornerstone of our strategy, as part of enhanced awareness and training, equipping them to recognise and mitigate risks effectively.

While our assessments reaffirm a low risk of modern slavery within our direct operations, AAW remains committed to proactive measures. This includes refining risk assessment processes, supporting education initiatives for employees and partners, and collaborating with industry leaders to share insights and best practices.

Our statement reflects not only compliance with legal standards, but also a broader commitment to fostering ethical responsibility within and beyond our operations. By advancing transparency and reinforcing a culture of accountability, we aim to contribute meaningfully to global efforts to eliminate modern slavery.

We recognise that there is always more to do and remain steadfast in our dedication to this mission. Through our continued focus and the support of our partners, we hope to drive lasting change and make meaningful progress toward a more equitable world.

**Andrew Maguire**  
Managing Director

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## Purpose of the Statement

AAW Group Holdings (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

Established in 1983, AAW Group Holdings Pty Ltd (AAW), previously known as AAW Global Logistics Pty Ltd (ABN: 14 007 257 865), is a renowned international freight forwarder. With a team of 108 professionals, we operate from strategically located offices in Melbourne, Brisbane, Sydney, Adelaide, Fremantle, and Auckland.

Our global market coverage extends across all aspects of transportation and logistics, enabling us to deliver a comprehensive "Total Global Multi-Model Service" to our valued customers. Tailoring our offerings, we provide specialised services such as transportation and distribution, warehousing and storage, pre-retailing, dedicated transportation, project management, customs brokerage, and consultancy. Over the years, AAW has expanded and diversified, now offering a wide range of services through our specialised divisions.



## Freight Forwarding Global Coverage: Sea & Air

Extensive expertise internationally and across Australia/New Zealand:

- Export, Import & Cross Trade
- FCL, Consolidation, Reefer
- Customs Brokerage in-house
- Warehousing & Fulfilment
- Visibility Platform - Lighthouse
- Global Partner Network



## Domestic Coastal Cargo & Road/ Rail Services

Specialist in Sea, Road and Rail movements of dry and refrigerated cargo between all major Australian cities, and across in-land and regional locations. Able to provide bespoke door-to-door logistics solutions.



## Shipping Line Agency / Sales and Marketing

Comprehensive range of commercial and operational services for variety of vessel sizes and types. Support services including: crew changes, vessel provisions, maintenance and repairs, crew medical services, port services, route surveys, and waste management.



## International Bulk Liquid and Dangerous Goods Forwarding

End-to-end international services for the movements of ISO Tanks (as an agent for HOYER Group) and Flexi-tanks to worldwide destinations. Specialised skills in the movement of a variety of dry and liquid dangerous goods to international destinations.



### **Domestic Bulk Liquid and Dangerous Goods Forwarding**

Bulk liquid services for domestic Australian and New Zealand markets. Fleet management, transport, & decanting – equipment including: ISO Tank Containers, IBCs, Flexi-tanks, & Dry units. Product types including: chemical, foodstuffs, and cryogenically liquefied gases.



### **Supply Chain Management & Logistics Services**

Integrated logistics capabilities developed through customer partnerships, delivering niche solutions to blue chip customers and specialised SME's markets: Automotive, FMCG, Agriculture, Chemicals, Raw Materials and Commodities Trading.



### **Regional Specialisation – Fresh Produce & General Cargo**

Dedicated to servicing the logistics needs of regional Australia with technical expertise in cold chain logistics and a broad range of capabilities to provide solutions for the unique requirements of regional customers.



### **Project Forwarding, Chartering and Management**

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. Cargo types including: Break-bulk, RoRo, Heavy Lift, Modular Cargo, and Air.

# Our People

In FY2024, AAW's workforce grew to 101 employees in our Australian operations and 7 employees in New Zealand, including both casual employees and independent contractors. Aligning to 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 behavior at all stages of the overall recruitment process.

**At AAW, we recognise that our most valuable asset is our people. Therefore, we prioritise employee welfare by fostering a supportive work environment, promoting well-being programs, and providing workplace flexibility.**

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 considering 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.

**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.



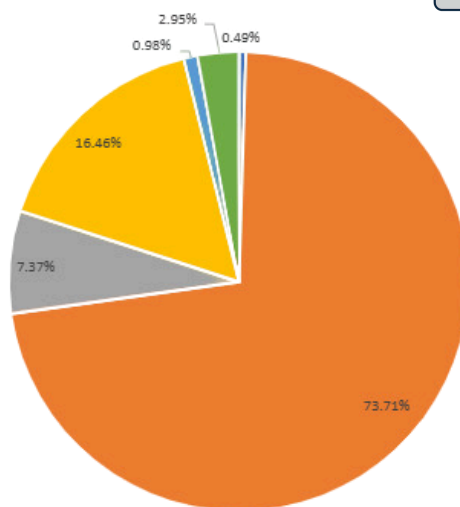
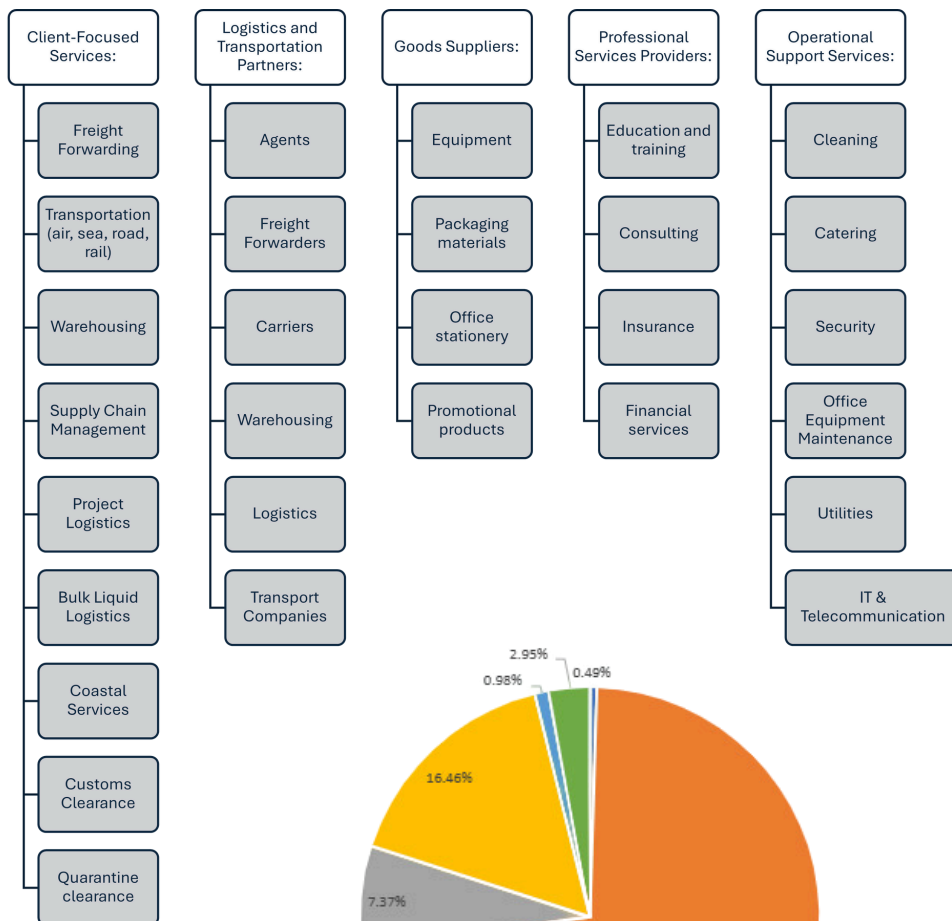




# Our Supply Chain

As an international freight forwarder, we have established business relationships with suppliers locally and globally, enabling us to provide our customers the highest levels of service and efficiency in the transit of their goods. At AAW, we recognize the importance of human rights and dignity, and are committed to working with likeminded businesses, thus being proactively combating modern slavery as we carry out our role as a player in the international supply chain.

For this reporting period, AAW's supply chains encompass the following types of services:



Location of our Suppliers

■ South America ■ Oceania ■ Europe ■ Asia ■ Africa ■ North America



# Risks of Modern Slavery in our Operations

## OPERATIONS RISK

In FY2024, AAW has continued to operate exclusively in Australia and New Zealand, both of which are generally considered to have a lower risk of modern slavery based on geographic and regulatory factors. However, we recognize that modern slavery still exists in these regions, particularly affecting vulnerable workers, migrants, and those in low-skilled, casual, or insecure forms of employment.

These groups remain at heightened risk of exploitation, and we are committed to continuously assessing and addressing potential risks within our operations and supply chains.

In the case of our company, 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. We also educate our partner regarding ethical workplace practices and modern slavery and have a robust whistleblower process in place accessible to our outsourced teams.

## LABOUR RISK

Throughout the reporting period, AAW has upheld a diverse workforce, encompassing permanent full-time and part-time employees, as well as temporary and casual staff. Our team, situated in Australia and New Zealand, primarily undertakes office-related responsibilities.

In our Australian operations, small percentage of our employees are covered by a Modern Award, and those employees receive terms and conditions greater than the legislated minimums.

Additionally, a small portion of our workforce operates as casual employees, and individuals engaged under independent contracts. This flexible employment framework underscores our commitment to adaptability, ensuring a range of employment arrangements tailored to the evolving needs of our workforce.

It's important to note that while acknowledging the potential for modern slavery in Australia, a significant 93% of our employees are skilled professionals. This composition significantly mitigates the risks associated with modern slavery, emphasising our commitment to maintaining a workforce characterised by expertise and professionalism.

**“Effectively managing operational risk involves identifying, assessing, and mitigating potential threats to ensure the continuity and resilience of business operations.”**



## RECRUITMENT RISK

In relation to deceptive recruitment practices, we acknowledge that modern slavery risks are prevalent in this area, even in Australia.

In FY2024, AAW continued to engage recruitment agencies who are members of reputable Australian and New Zealand recruitment industry associations such as corporate AHRI and RCSA memberships. They also are licensed in several Australian jurisdictions. Workers engaged through recruitment 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.

We are clear about the inherent risks of outsourcing recruitment. However, our recruitment agencies as described above, are in alignment with regulations and ethical standards – further, they do not charge recruitment fees to successful or prospective employees. These factors reassure us of the possibility of modern slavery in this element of operations, being low.

As part of the induction process, AAW continues to mandate training on Modern Slavery compliance and provides a copy of AAW's Whistleblower Policy, which includes a mechanism for reporting modern slavery, as well as access to health and safety reporting mechanisms and other training and information as appropriate to perform their role.

**“In safeguarding our business from recruitment risk, we have instituted a set of proactive measures and best practices. Our recruitment policies stand as clear guidelines, articulating the procedures, criteria, and standards for hiring to ensure a structured and error-resistant process. Detailed and accurate job descriptions serve as a foundation, attracting candidates who align with our needs and minimizing the risk of mismatched hires.”**







## 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 our vendors are 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. Whilst AAW has limited visibility into this supply chain, awareness and education on Modern Slavery, an accessible whistleblower policy and biannual visits to certain outsourced locations, serve to strengthen our awareness and prevention protocols.

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

AAW engages freight forwarders and transportation companies based in Australia, New Zealand, Pacific Islands, Asia, Middle East, Americas, Europe, 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 ability to exert control, particularly in instances where key suppliers are larger, hence have greater leverage 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. Regardless, AAW endeavours 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, including during the reporting period, 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 was updated during this reporting period and is tabled for further review in FY24 to ensure continued compliance with the Fair Work Act and its amendments.

### **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 several 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 public 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 any Whistleblower report.

### **Flexibility at Work Policy**

We support our employees in maintaining a healthy work-life balance by offering flexible working arrangements through our Flexibility at Work Policy. This option is available to all employees who have completed their training period. As part of this initiative, we continually strive to enhance staff retention, well-being, and diversity, while furthering our people-first approach. Each year, we review and approve working from home arrangements to ensure that our employees have a safe and appropriate environment to work in. Employees are required to complete a checklist annually, or whenever their home office setup changes significantly, allowing us to evaluate and confirm that their home workspace is safe and conducive to work. This ongoing process ensures that we meet the evolving needs of our team while upholding workplace safety standards.



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### **Working Together Policy**

AAW's Working Together Policy is designed to create a safe and respectful working environment where employees are treated with dignity and fairness. This policy outlines the company's commitment to providing a workplace free from harassment, discrimination, and any form of inappropriate behavior. It establishes clear expectations for how employees should interact with each other and the steps the company will take to address any issues that arise.

The policy aims to ensure that all employees can work in an environment that reflects harmony, safety, and security. The Working Together Policy is available to all employees through our intranet and is referenced in our Employee Handbook, ensuring consistent access to its guidelines and practices. This approach reflects our dedication to upholding a supportive and secure environment for all employees.

### **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, our Modern Slavery Policy 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 practices 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 FY2024, AAW did not receive any reports of modern slavery in our operations or supply chains.





### **Employee Code of Conduct Policy**

This year, we are progressing with the development of an Employee Code of Conduct Policy, which will outline the expected standards of behavior for employees and the company's approach to ethical business practices. The policy aims to clarify staff expectations, prevent inappropriate behavior, and foster a positive, respectful culture where all employees are treated equally.

While a summary of the policy is currently included in the Employee Handbook, the full document will be finalised and communicated to both new and existing staff during the upcoming reporting period. Due to some delays, we plan to publish this detailed policy in the first quarter of 2025.

### **Hours of Work Policy**

This policy is designed as a comprehensive guide for ensuring fair and equitable working hours, work allocation, and work arrangements, while also ensuring that employees understand and are able to meet their responsibilities in relation to their employment. The Hours of Work Policy was intended to be released during the reporting period. However, it is currently under review to incorporate the Right to Disconnect obligations outlined in the Fair Work Act. The updated policy is now expected to be released during the upcoming reporting period.

### **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 Director of the relevant Business Unit (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. Throughout the reporting period, AAW did not engage in the provision of internships or work experience placements.



## Visits to our Outsourced Team in The Philippines

This year, representatives from our Australian offices once again undertook a series of visits to our service providers in Manila, Philippines, continuing to foster engagement through various activities. These visits included comprehensive training sessions covering both general and specific user training, ensuring our teams are equipped with the necessary skills and knowledge. Our teams also received valuable IT assistance to enhance their technological capabilities.

In addition to skill development, we conducted a thorough review of the working conditions at the Manila offices, reaffirming our commitment to staff well-being. Each aspect reviewed during these visits exceeded established standards, reflecting our dedication to maintaining high-quality working environments.

Looking ahead, we plan to continue this collaborative and supportive approach, with the next site visit scheduled for mid-2025. This ongoing engagement highlights our commitment to fostering positive relationships, supporting our teams, and upholding operational excellence.

## ISO 9001 Quality Management System

We proudly hold ISO certification, a testament to our commitment to quality management. This recognition underscores our dedication to consistently delivering products/services that meet high standards and customer expectations. It reflects our adherence to best practices, continuous improvement, and a systematic approach to ensuring top-notch quality in all facets of our operations.

In addition, our ISO certification establishes essential processes and procedures that support AAW in various aspects. These include measuring compliance with the Modern Slavery Act, assessing procurement procedures, evaluating risks, and ensuring a continual commitment to addressing modern slavery issues. The ISO framework further enables us to effectively gauge the impact and success of our actions in these crucial areas.

## 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. Relevant to the context of modern slavery, we:

- Have physical security measures, 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.



## Due Diligence

### Policy Development

In our ongoing commitment to uphold AAW's ethical standards and business integrity, we consistently evaluate and refine our internal processes and policies.

### Risk Assessment

AAW conducts a Supplier Risk Assessment, employing a systematic evaluation process to assess and manage potential risks linked to each and every supplier. The primary objective is to identify and understand the various risks that could impact the supply chain, business operations, and overall performance. This process also underscores our unwavering commitment to ethical and sustainable business practices

### Supplier Screening

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.

### Contractual Obligations

AAW has agency agreements with our overseas strategic partners, and offshore processing services, and prior to entering into these agreements, it conducts financial, human resource, and regulatory due diligence. These agreements include clauses that explicitly prohibit modern slavery.

AAW has vendor agreements with 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.

### Recruitment Practices

We follow our responsible recruitment practices, 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.

Our 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.





To streamline our recruitment processes and minimize risks, we are developing a preferred supplier list for recruitment providers. This ensures that we work exclusively with partners who meet our high standards for ethical practices, transparency, and compliance, reinforcing our commitment to responsible recruitment.

## Training of Staff

**Providing modern slavery training to our employees serves several crucial purposes within our organization:**

- **Awareness and Understanding:** The training increases awareness among our staff about the existence and complexities of modern slavery. It ensures that employees understand the various forms of exploitation, contributing to a more informed and vigilant workforce.
- **Human Rights Education:** The training helps educate employees on human rights principles, emphasizing the importance of respecting and protecting the rights of individuals. This knowledge is fundamental in fostering a workplace culture that upholds ethical standards.
- **Risk Mitigation:** By educating our staff about modern slavery risks, we empower them to identify and address potential issues within our operations and supply chain. This proactive approach contributes to risk mitigation and aligns with our commitment to responsible business practices.
- **Organisational Culture:** Providing modern slavery training helps shape a corporate culture that prioritizes ethical considerations. It sends a clear message that we are dedicated to creating a workplace environment that values human rights and actively opposes any form of exploitation.
- **New Hire Integration:** Incorporating the training into the induction and probation period for new hires ensures that ethical standards are communicated from the beginning of their tenure. This helps in embedding responsible practices within the organizational culture.

**Overall, modern slavery training is a proactive measure to equip our workforce with the knowledge and tools needed to contribute to the prevention of modern slavery, aligning with our broader commitment to ethical business conduct.**



To ensure that 100% of employees undergo modern slavery training at the time of their induction.



### Rolling Out a New Learning Platform (KnowBe4)

As part of our commitment to continuous improvement, we plan to launch KnowBe4, a new learning platform designed to enhance our team's skills and awareness, particularly in cybersecurity and compliance. This user-friendly tool provides engaging and effective training, equipping employees to address evolving challenges in the workplace.

## 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

AAW 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.

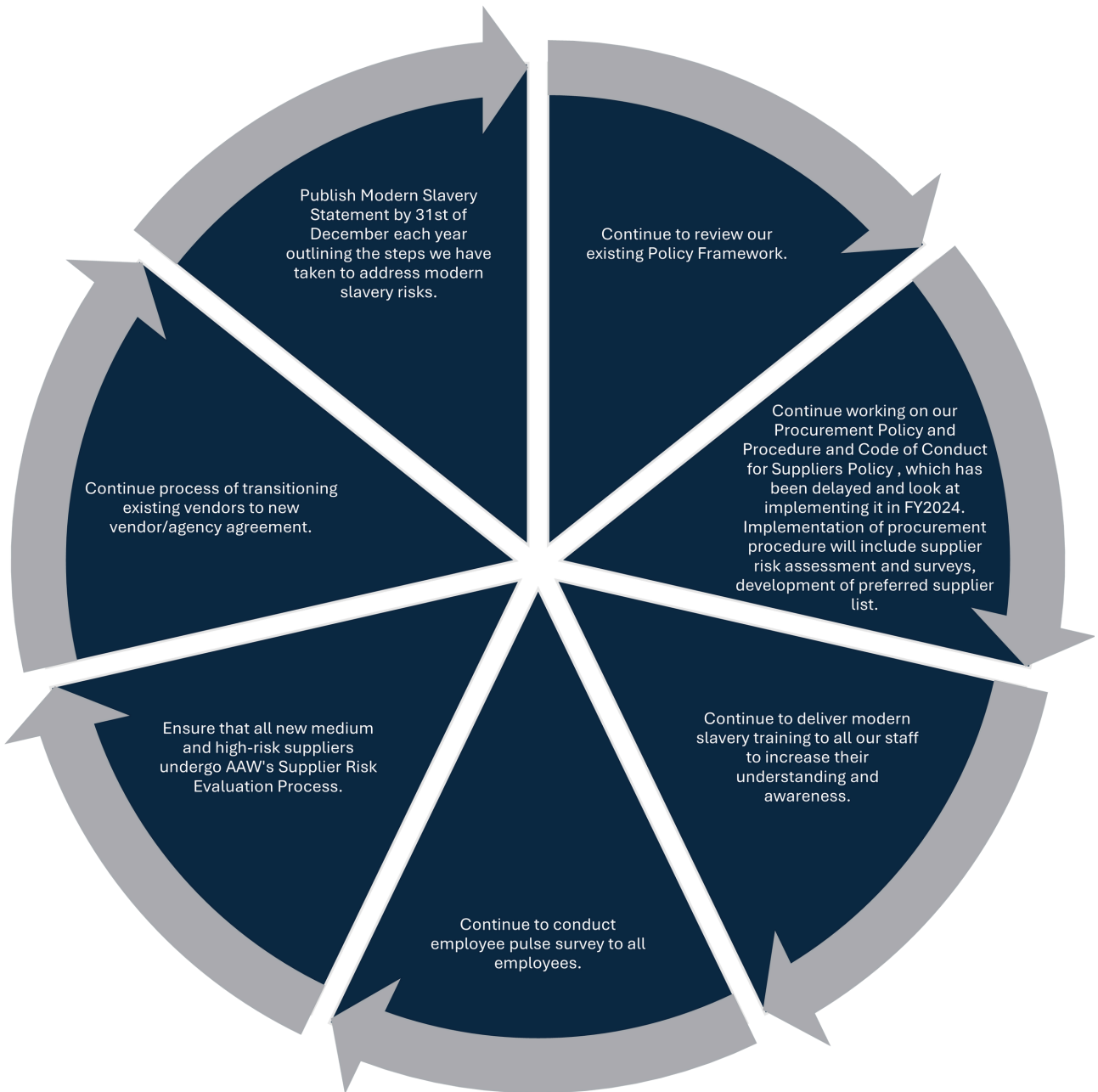
## Monitoring and Reporting

- 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;





# Continuous Improvement





## Consultation

AAW operates as an integrated Group, guided by comprehensive policies and procedures applied across all entities. This statement was prepared following consultation between AAW Group Holdings Pty Ltd (ACN 007 257 865) and its wholly owned subsidiaries including AAW Global Logistics (Australia) Pty Ltd (ACN 668 555 048), AAW Bulk Liquid Logistics Pty Ltd (ACN 668 554 710), AAW Global Logistics (NZ) Limited (NZCN 6844333), Regional Shipping Services Pty Ltd (ACN 087 872 580), Coastalbridge Pty Ltd (ACN 668 259 818); and joint venture Hoyer Logistics Australia Pty Ltd (ACN 625 946 232).

\*\*\*This statement was prepared in consultation with each subsidiary and controlled entity, and it was reviewed and approved by the AAW Board of Directors on December 23rd, 2024.



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