



30 April 2026

## Modern Slavery Statement

This statement is made pursuant to the Australian *Modern Slavery Act 2018* (Cth) and constitutes the modern slavery statement for Kuehne & Nagel Pty Ltd (**Kuehne+Nagel Australia, we, our**) for the financial year ending December 2025. Where in this statement we refer to “Kuehne+Nagel” or “Group” it is a reference to our broader corporate group, which includes Kuehne+Nagel Australia.

We remain committed to improving our practices to combat modern slavery (including eight types of serious exploitation - human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services) in our supply chains or in any part of our business.

Kuehne+Nagel's vision is to be the most respected forwarding and logistics company. This vision, together with our Ethics and Compliance program, is designed to ensure that we comply with all applicable legal and regulatory requirements as well as with our internal regulations and other rules of professional conduct.

Kuehne + Nagel Australia is an accredited Trusted Trader under the Australian Trusted Trader (ATT) Program, which recognises businesses for their secure supply chain and compliant trade practices.

### **Our structure, operations and supply chains**

#### **Structure**

In 1890, August Kuehne and Friedrich Nagel founded a freight forwarding company in Bremen, Germany. Over the last 130 years, Kuehne+Nagel has evolved from a traditional shipping company to a global logistics partner that offers highly specialised solutions for major industries worldwide.

Today, Kuehne+Nagel is headquartered in Switzerland, with a presence all over the world, including Australia. Kuehne+Nagel Australia has no owned or controlled entities.

#### **Operations**

We are a leading provider of international freight and logistic services and have over 12 locations and approximately 587 employees in Australia, as of December 2025. Our vision is becoming the most trusted supply chain partner supporting a sustainable future. Employees of Kuehne+Nagel Australia fulfil a range of roles from executives and professionals to blue collar workers, working as storepersons and forklift drivers, to administrative staff. Of our workforce, 96% are full time, 4% part time and the number of casuals fluctuate during the year due to seasonal demands of our customers.

Our company comprises five key business units (Seafreight, Airfreight, Contract Logistics, Road, and Project Logistics) and five key functions (HR, IT, Finance, Sales and QSHE (Quality, Safety, Health & Environment)). Our customers typically operate in the retail or industrial sector that import into, or export products out of, Australia. Our services include facilitating international and domestic freight forwarding and customs clearance, logistics, storage and distribution. We do not provide land transport or international shipping services directly. We engage with third parties to deliver these services.

Kuehne & Nagel Pty Ltd  
ABN 70 000 871 607

Level 6, 484 St Kilda Rd  
Melbourne VIC 3004  
Australia

PO Box 1118  
Tullamarine VIC 3043  
Australia

Tel: +61 3 9394 3300  
[www.kuehne-nagel.com.au](http://www.kuehne-nagel.com.au)

This Company is an individual member of the International Federation of Freight Forwarders Associations (FIATA). Unless otherwise agreed in writing by an officer of the Company, all transactions with the Company are subject to the FIATA Model Rules for Freight Forwarding Services as adopted by this Company (copies are available anytime from the Company upon request), which, in certain cases, exclude or limit the Company's liabilities. Generally the Company's liability for loss of or damage to goods is limited to 2 SDR per kg of the concerned goods, liability for delay is limited to the remuneration for the affected services, and liability for other type of loss is limited to SDR 10,000 for each incident. Further to those limitations the Company's liability shall in no event exceed a total annual aggregate of SDR 500,000, unless mandatory law stipulates otherwise.



## Supply chains

The top 5 industries by spend of our suppliers are:

- Transport including shipping, airlines, trucking and distribution support services;
- Leasing and facilities;
- Labour hire providers;
- IT, communications – both hardware and software and supporting services;
- Hospitality, including travel and other incidental business expenses.

Our related entities regularly provide us with services, for example provision of customs services or transportation within the jurisdictions where Kuehne+Nagel operates. In some circumstances we are instructed by our customers to use a specific logistics/other service provider, such as customs or freight providers.

Our suppliers are engaged both locally and globally. Our procurement processes are managed by local and/or global category managers.

Although many of our suppliers are domiciled in Australia, they often rely on, source or provide us with goods or services that originate from other jurisdictions, such as shipping companies that operate around the globe and IT hardware retailers that source finished goods from manufacturers.

## Risk of modern slavery in our operations and supply chains

We have reviewed the risk of modern slavery in our operations and supply chains

### Operations

We consider that the risk of modern slavery in our operations is low because:

- Our operations are all located in Australia, a country with a lower prevalence of, and vulnerability to modern slavery according to the Global Slavery Index 2023, although we appreciate that even in lower risk jurisdictions like Australia modern slavery exists.
- We vet all of employees to ensure that they are entitled to work in Australia and are over 18 years of age unless they are participating in an accredited traineeship.
- No trainees under 18 years of age are permitted to undertake hazardous work.
- All of our employees are paid at least minimum wage.
- Our forklift and storepersons are covered by an Enterprise Agreement, which guarantees their terms and conditions including wages, leave and overtime.
- Where we use recruiters to provide casual labour, we undertake a detailed due diligence process, which includes ensuring that they have all licences in place to provide casual labour.
- We annually train employees in relation to our Code of Conduct and ask whether they are aware of how to report any instances of non-compliance.
- We did not receive any whistleblower reports in the reporting period that raised red flags for modern slavery.

We acknowledge that there is inherent risk in using labour hire services for base skilled work. This is often due to the lack of visibility in relation to worker recruitment processes and the payment of wages and entitlements. In Australia, our labour hire providers must hold a Labour Hire Licence where it is a regulatory requirement. We undertake due diligence in relation to these suppliers and take the results of the due diligence in account in managing and reviewing our ongoing relationship with labour hire providers.

Kuehne & Nagel Pty Ltd  
ABN 70 000 871 607

Level 6, 484 St Kilda Rd  
Melbourne VIC 3004  
Australia

PO Box 1118  
Tullamarine VIC 3043  
Australia

Tel: +61 3 9394 3300  
www.kuehne-nagel.com.au



## Supply chains

It is unlikely that we have caused or contributed to modern slavery via our supply chain but recognise the potential that we may be indirectly linked to modern slavery risks within the sub-tiers of our supply chain. We have identified the following modern slavery risks in our supply chains:

- **Suppliers operating in higher risk industries:** as a logistics provider, we are very aware of the risk of modern slavery in the transportation and logistics sector, particularly shipping. As with all businesses, we also have modern slavery risk in our IT hardware, merchandise and uniforms, PPE, cleaners, and facilities management.
- **Suppliers operating in or sourcing from higher risk countries:** where our suppliers operate in or source from countries with higher risks for modern slavery. This includes jurisdictions where the rule of law is weak, wages are low, there are low barriers to entry for unskilled work, and where children work in hazardous conditions compromising their health and access to education.

Many of our suppliers will also have supply chains that start with raw materials from high risk sectors or jurisdictions. In deploying supplier due diligence to Ethixbase360, we have improved visibility of supplier risks and the adequacy of the controls they have in place to manage inherent risks.

During the reporting period, we continued our modern slavery risk assessment of new and re-qualified local suppliers via a modern slavery questionnaire (**MSQ**). This ongoing supplier risk assessment has identified the following key risk areas in the reviewed suppliers:

- (1) 7% of suppliers received a high-risk rating. The drivers of risk included suppliers operating in higher risk industries, the use of materials with inherent risks of slavery in its supply chain without measures to mitigation measures, sourcing from higher risk countries and the utilisation of vulnerable categories of workers.
- (2) A small number of our suppliers provided responses to the MSQ that raised red flags, for example, workers not being able to join a union, workers having to surrender passports and wage deductions being used as a disciplinary measure. These suppliers are being contacted for clarification regarding their MSQ responses and whether there may have been inadvertent errors in completing the form.

## Actions to manage modern slavery risk

### Operations – Policies and Procedures

Our business activities are conducted in line with the ethical principles laid out in our global [Code of Conduct](#). The code applies to all members of the company and serves as a guide of worldwide consistent principles. It promotes ethical behaviour in all our business interactions, internal and external.

Our Code of Conduct expresses our opposition to violations or limitations of human rights and dignity of any kind which includes, but is not limited to, any form of discrimination, slavery and torture, human trafficking, or forced and child labour.

On 1 January 2023, Kuehne+Nagel adopted a global [Human Rights Policy](#) that consolidated existing guidance and includes and supports the following principles:

1. Prohibition of child labour
2. Culture of diversity and inclusion, free from harassment and discrimination
3. Employee rights and fair labour practices, including the prevention of forced labour and slavery
4. Freedom of Association and right to collective bargaining.

Kuehne & Nagel Pty Ltd  
ABN 70 000 871 607

Level 6, 484 St Kilda Rd  
Melbourne VIC 3004  
Australia

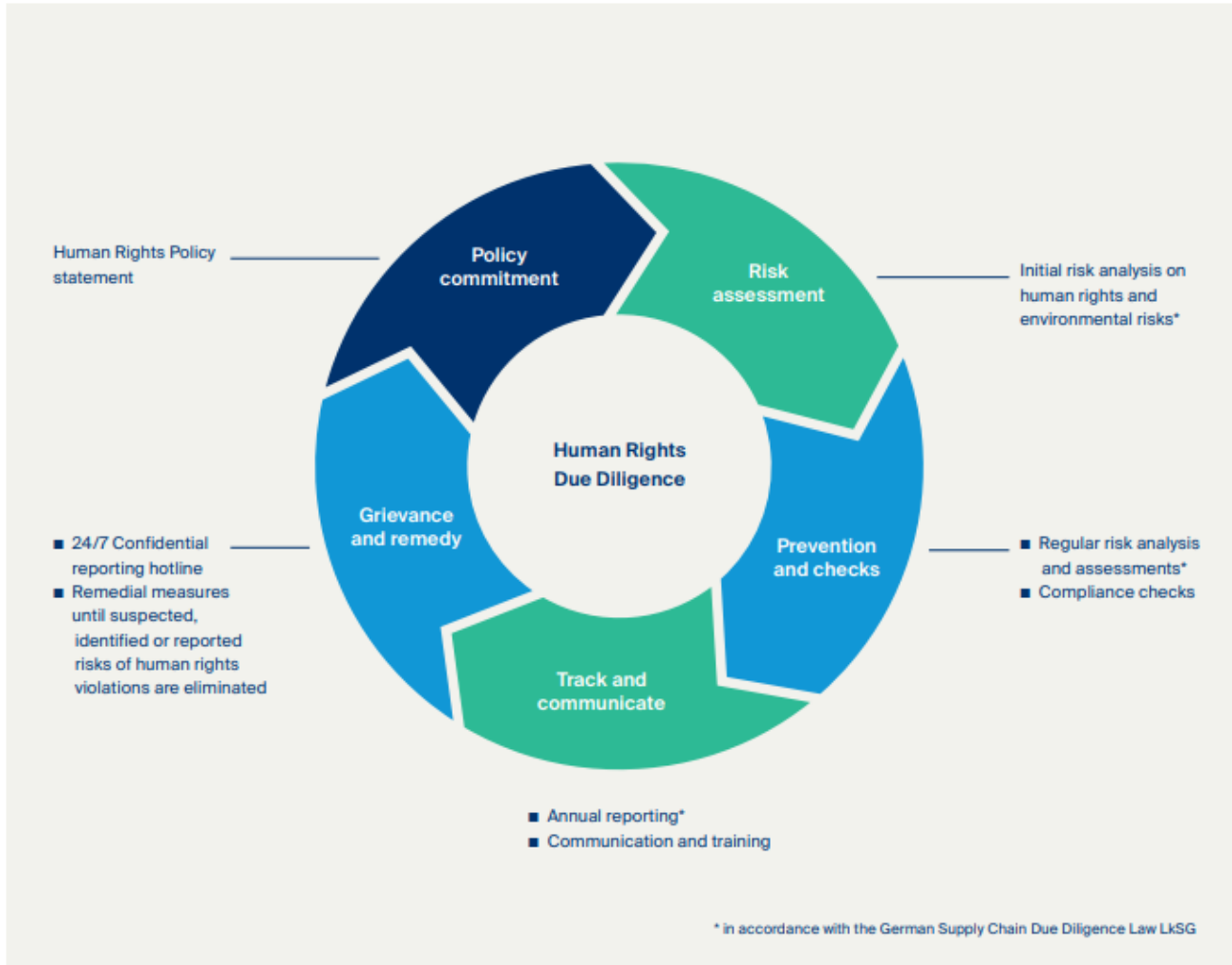
PO Box 1118  
Tullamarine VIC 3043  
Australia

Tel: +61 3 9394 3300  
[www.kuehne-nagel.com.au](http://www.kuehne-nagel.com.au)



Kuehne+Nagel’s [Sustainability Report 2025](#) provides an outline of our strategies in this area on a global basis. Kuehne+Nagel Australia aligned its strategies to support the goals of the Sustainability Report **2025**<sup>1</sup>.

The diagram below visualises the Kuehne+Nagel Human Rights Due Diligence Program. In 2022, a Human Rights Risk Assessment was undertaken in accordance the German Supply Chain Due Diligence Act. Similar risk assessments are planned to be rolled out in additional countries including Australia.



**Human Rights Due Diligence**

Internal and external audits are undertaken annually and, on an adhoc basis to assess our compliance with our own policies and procedures. Through our compliance programs, catalogue of competence authority/approvals matrix, procurement practices and financial audit processes, we continue to regularly review our compliance with our policies and procedures.

<sup>1</sup> <https://2025-annual-report.kuehne-nagel.com/sustainability-report/message-from-the-executive-management-board>

Kuehne & Nagel Pty Ltd  
ABN 70 000 871 607

Level 6, 484 St Kilda Rd  
Melbourne VIC 3004  
Australia

PO Box 1118  
Tullamarine VIC 3043  
Australia

Tel: +61 3 9394 3300  
www.kuehne-nagel.com.au

This Company is an individual member of the International Federation of Freight Forwarders Associations (FIATA). Unless otherwise agreed in writing by an officer of the Company, all transactions with the Company are subject to the FIATA Model Rules for Freight Forwarding Services as adopted by this Company (copies are available anytime from the Company upon request), which, in certain cases, exclude or limit the Company’s liabilities. Generally the Company’s liability for loss of or damage to goods is limited to 2 SDR per kg of the concerned goods, liability for delay is limited to the remuneration for the affected services, and liability for other type of loss is limited to SDR 10,000 for each incident. Further to those limitations the Company’s liability shall in no event exceed a total annual aggregate of SDR 500,000, unless mandatory law stipulates otherwise.



## **Recruitment**

We have in place various policies and work instructions that govern our employment practices. These include our:

- Recruitment & Selection Policy
- Onboarding Policy
- Remuneration & Benefits Policy
- Health and Safety Statement
- Employment Contracts Management Policy

These policies and work instructions are designed to ensure that we meet all our legal obligations to our employees. They include requirements that all employees are legally entitled to work for us (for example they are of legal working age and are entitled to work in Australia) and that they are paid appropriately.

## **Child Labour Checks**

In 2023, Kuehne+Nagel carried out child labour checks within its own operations without any findings and updated its Integrated Management System audit processes to incorporate additional checks for child labour and human rights risks and violations, effective from 2025. This included Kuehne+Nagel Australia.

## **Training**

We annually train employees in relation to the Code of Conduct, which includes modern slavery prohibitions, and ask whether they are aware of how to report any instances of non-compliance. In addition:

- All new employees receive HR induction training covering these commitments.
- Senior leaders complete a three hour 1:1 corporate induction focused on organisational responsibilities.
- Refresher training is delivered periodically to maintain awareness across the organisation.

Internal awareness continues to be supported through training and corporate communications. The public sustainability and ESG communications reinforce our commitments to human rights, labour rights, and diversity and inclusion. Locally we have a diversity, equity and inclusion committee who have a role and responsibilities.

## **Reporting of concerns**

We have a Whistleblower Protection Policy that facilitates staff and suppliers reporting matters of concern, including human rights impacts such as modern slavery (which is a violation of our Code of Conduct and therefore reportable). Our Whistleblower Protection Policy provides that individuals who raise concerns pursuant to that policy are protected from retaliation.

Kuehne+Nagel maintains a secure and confidential whistleblower system, the Confidential Reporting Line, accessible to both employees and external stakeholders, enabling the reporting of suspected misconduct without fear of retaliation. The link to the Confidential Reporting Line is published on the company website at <https://www.kuehne-nagel.com/company/ethics-and-compliance/confidential-reporting-line> and the direct link is <https://secure.ethicspoint.eu/domain/media/en/gui/107315/index.html>. All reports are investigated promptly and thoroughly, with appropriate disciplinary and remedial actions taken as necessary. Periodic internal audits are conducted to assess the effectiveness of anti-corruption controls and identify areas for improvement.

Kuehne & Nagel Pty Ltd  
ABN 70 000 871 607

Level 6, 484 St Kilda Rd  
Melbourne VIC 3004  
Australia

PO Box 1118  
Tullamarine VIC 3043  
Australia

Tel: +61 3 9394 3300  
[www.kuehne-nagel.com.au](http://www.kuehne-nagel.com.au)



### **Supply chains**

Launched in 2025, the Global Procurement Policy also integrates sustainability into supplier management through a due diligence process, providing a unified framework for procurement activities across selected managed non-trade categories. It establishes clear ESG requirements and embeds sustainability considerations in supplier selection, contracting and ongoing engagement. Through 2025, the rollout of a new supplier management tool had been implemented in 50+ countries with more countries in progress. The 2026 target is its rollout in the remaining countries, particularly in Asia and the Americas.

### **Customer due diligence**

During a tender bidding process, larger customers typically share their code of conduct with us for review and acceptance. Similarly, we share our Kuehne + Nagel Code of Conduct with our customers. The principles laid out in our customers' codes of conduct are typically comparable to the principles we are working towards. Differences commonly result from different special areas depending on industries and sectors.

### **Know your supplier program**

The Integrity Due Diligence (IDD) process is designed to assist our business managers' decision-making by assessing the risk of conducting business with a particular potential third party. It also helps to develop an objective basis upon which management can proceed in the reasonable belief that the third party is not likely to make improper payments to anyone or commit other illegal or unethical acts in performing its agreements or functions with us. Key emphasis on Integrity Due Diligence procedures is focussing on interactions with government officials such as customs clearance activities when subcontracted to third parties.

In order to identify specific risks of modern slavery in our supply chains, we have continued our supplier risk assessment for this reporting period. This assessment was undertaken by way of issuing the MSQ to new and requalified preferred suppliers. There were 165 MSQs were completed in the 2025 calendar year.

### **Supplier engagement practices**

We have in place a supply chain compliance programme which requires all our suppliers to sign up to, and comply with, the Kuehne+Nagel *Supplier Code of Conduct*. As part of the Supplier Code of Conduct, suppliers agree not to use forced, indentured, involuntary or child labour and agree to uphold internationally proclaimed human rights of workers. They agree to use reasonable efforts to promote the principles of the Supplier Code with their suppliers. We take compliance with our Supplier Code of Conduct seriously and any breach allows us to firstly seek a corrective action plan and remediation, our last resort would be to terminate our relationship with a supplier immediately.

We have standard supplier agreements that require suppliers to agree to manage human rights / modern slavery risk as described in our Supplier Code of Conduct.

A revised supplier code of conduct has been released internally. However, implementation is on hold pending the decommissioning of the current supplier management system. The new global system is scheduled to launch in 2026. The updated supplier code of conduct will be integrated into the new platform.

### **MSQ Review**

The MSQ contains approximately 19 questions designed to assess the modern slavery risks in our suppliers' business and supply chains. The responses to the questions are weighted based on data analytics driven by global indices on modern slavery and human rights risks.

Kuehne & Nagel Pty Ltd  
ABN 70 000 871 607

Level 6, 484 St Kilda Rd  
Melbourne VIC 3004  
Australia

PO Box 1118  
Tullamarine VIC 3043  
Australia

Tel: +61 3 9394 3300  
[www.kuehne-nagel.com.au](http://www.kuehne-nagel.com.au)

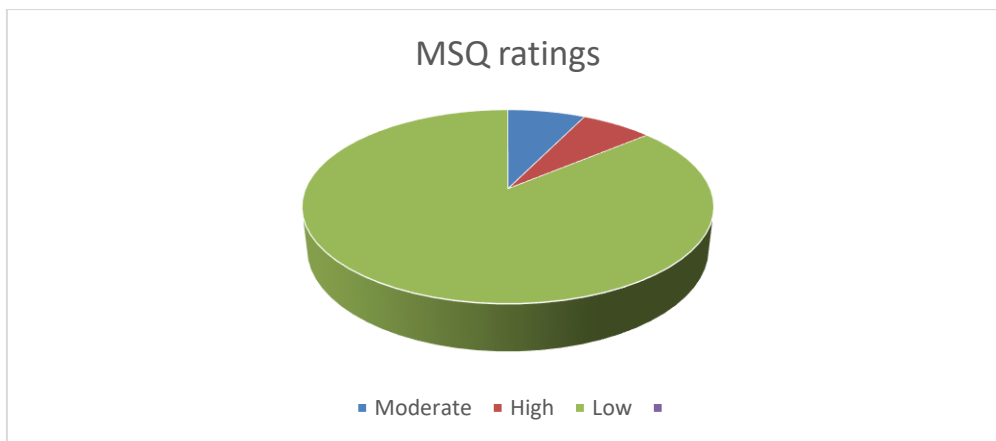


The scoring focuses on five areas:

- Jurisdiction (where a supplier operates and sources from)
- Policies, processes, and systems (risk mitigating controls)
- Activity (inherent industry risk)
- Workforce profile (utilisation of potentially vulnerable workers)
- Human rights (training, audits, and assessments on human rights)

Upon completion of the MSQ, the suppliers are allocated an overall risk rating between 1 to 10 with 1 presenting a lower modern slavery risk and 10 presenting a higher risk of modern slavery. We use the MSQ as a prioritisation tool to identify the suppliers requiring further engagement regarding modern slavery risks in their operations or supply chain.

The breakdown of the ratings allocated to suppliers that completed the MSQ in 2025 are shown in the pie chart below. 85% of suppliers that completed the MSQ are small to medium sized enterprises and 12% were large entities with modern slavery reporting obligations of their own. 98% of suppliers are based in Australia.



Follow-up has been prioritised for suppliers with a high-risk score. Our targeted engagement is undertaken using a risk-based approach, with higher risk supplier questionnaire responses reviewed to identify specific risk drivers and followed up directly with suppliers to seek clarification or additional information where required.

**Remediation**

If we identify modern slavery in our operations or supply chains, our response will be guided by the UN Guiding Principles on Business and Human Rights. We will prioritise the interests of the victim of modern slavery and participate in the provision of a remedy where we cause or contribute to the impact.

**Assessing the effectiveness of our actions**

Our modern slavery program is overseen by our Board.

We measure effectiveness by reference to: how we operationalise our policies and controls, reflecting on areas needing improvement, equipping our employees with an understanding of why modern slavery mitigation is important to us and building a sense of collective responsibility to be aware of the risks and to consider them when procuring goods or services, increasing visibility of our supply chain and engaging with our suppliers regarding modern slavery.

Kuehne & Nagel Pty Ltd  
 ABN 70 000 871 607

Level 6, 484 St Kilda Rd  
 Melbourne VIC 3004  
 Australia

PO Box 1118  
 Tullamarine VIC 3043  
 Australia

Tel: +61 3 9394 3300  
 www.kuehne-nagel.com.au

This Company is an individual member of the International Federation of Freight Forwarders Associations (FIATA). Unless otherwise agreed in writing by an officer of the Company, all transactions with the Company are subject to the FIATA Model Rules for Freight Forwarding Services as adopted by this Company (copies are available anytime from the Company upon request), which, in certain cases, exclude or limit the Company's liabilities. Generally the Company's liability for loss of or damage to goods is limited to 2 SDR per kg of the concerned goods, liability for delay is limited to the remuneration for the affected services, and liability for other type of loss is limited to SDR 10,000 for each incident. Further to those limitations the Company's liability shall in no event exceed a total annual aggregate of SDR 500,000, unless mandatory law stipulates otherwise.

**Consultation**

The Reporting Entity has no subsidiaries. Representatives of all our 5 key functions were involved in the preparation of this statement.

**Approval**

This statement was approved by the Board of Kuehne & Nagel Pty Ltd on ...18 May 2026.....

This statement applies to Kuehne & Nagel Pty Ltd.

Francis Murugan  
Chairman and Managing Director – Kuehne & Nagel Pty Ltd

Dated: ...27 May 2026.....

**Kuehne & Nagel Pty Ltd**  
ABN 70 000 871 607

Level 6, 484 St Kilda Rd  
Melbourne VIC 3004  
Australia

PO Box 1118  
Tullamarine VIC 3043  
Australia

Tel: +61 3 9394 3300  
[www.kuehne-nagel.com.au](http://www.kuehne-nagel.com.au)

This Company is an individual member of the International Federation of Freight Forwarders Associations (FIATA). Unless otherwise agreed in writing by an officer of the Company, all transactions with the Company are subject to the FIATA Model Rules for Freight Forwarding Services as adopted by this Company (copies are available anytime from the Company upon request), which, in certain cases, exclude or limit the Company's liabilities. Generally the Company's liability for loss of or damage to goods is limited to 2 SDR per kg of the concerned goods, liability for delay is limited to the remuneration for the affected services, and liability for other type of loss is limited to SDR 10,000 for each incident. Further to those limitations the Company's liability shall in no event exceed a total annual aggregate of SDR 500,000, unless mandatory law stipulates otherwise.