

Modern Slavery Annual Statement

Introduction

This Modern Slavery statement is prepared and presented by Northline Partnership (Northline) pursuant to the Commonwealth of Australia Modern Slavery Act 2018 (the Act).

This statement is intended to meet the requirements of the Act and describes the steps taken by Northline during the financial year ended 30 June 2024.

Northline embraces the ideals of maintaining strong corporate governance, ethical conduct, transparency and respecting human rights in accordance with our values and Code of Conduct. Similarly, as we do, we expect all of our business partners to recognise the Human Rights of all people as outlined in the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights.

Reporting Entity

Northline is an Australian based, privately owned and operated global logistics business. The partners of Northline Partnership are Australian companies.

Northline Partnership is the controlling entity of the organisations within the group commonly known as Northline. Operational management is the same for all organisations.

During the reporting period this statement covers, all companies owned or controlled by Northline Partnership were actively engaged and consulted with regards the mitigation of modern slavery risks and the initiatives Northline Partnership take as noted in this statement.

Structure and Operations

Northline is a provider of national and international freight management, warehousing and distribution and project logistics to a diverse customer base covering many sectors of the economy from mining and oil & gas to manufacturing and retail.

Northline was established in 1983 and currently operates 13 branches across mainland state capitals as well as key regional centres. We have connections to over 100 international agents based in countries all around the world. The company employs staff across Australia as well as numerous sub-contractors across all states and territories of Australia providing services to our customers.

Northline enjoys being able to give back to the community by contributing to a number of charitable activities including community programs which improve the health and wellbeing of Australian communities.

Northline's Risk of Modern Slavery Practices in its Operations and Supply Chains

Operations

All employees engaged by Northline reside in Australia. All work for Northline is conducted on a voluntary basis and under detailed contracts of employment which comply with National Employment Standards.

Northline employees are free to withdraw from any employment relationship, subject to previous notice with reasonable length.

Northline prohibits and does not benefit from any forms of forced or compulsory labour and respects ethical labour practices and diversity.

The processes of recruitment and induction of all new employees includes provision of the Fair Work Information Statement which provides details about the National Employment Standards and other relevant information concerning employer and employee rights and obligations.

We have assessed the risk of the likelihood of incidence of Modern Slavery practices within our operations as rare to unlikely.

Supply Chains

Northline expects its suppliers to align with our governing principles and take responsibility to investigate their labour practices and have processes and compliance systems in place to ensure that there is no modern slavery used in their operations or supply chains.

Northline considers its overall risk of modern slavery to be low. We do accept there is a risk of modern slavery deeper within our supply chains which is more difficult to identify.

Our supply chain includes a substantial network of Australian based subcontractors, agents and suppliers.

We have assessed the risk of the likelihood of incidence of Modern Slavery practices within our goods and service providers and consider Northline to be at some minor risk of contributing to modern slavery through association with some of these suppliers, specifically those who source goods from overseas, typically China.

Our conducted Risk Assessments returned risk levels for our contractor categories as noted below.

- *Regular city based Pickup and Delivery (PUD) Contractors*
 - *Owner operator drivers - **Rare to Unlikely***
 - *Owner operator drivers who also own one or more additional vehicles and employ drivers - **Rare to Unlikely***
- *Linehaul carrier companies - **Rare to Unlikely***
- *Country agents – **Rare***
- *Other Supplier*
 - *Professional services including technical, administrative and IT – **Rare***
 - *Goods - Key products procured includes vehicles, trailers, containers, mobile plant, tools and equipment, spare parts, ancillary equipment and consumables for use in our operations, PPE & uniforms, office supplies and Equipment – **Unlikely but possible***
 - *Facilities Maintenance and Site Services - **Rare***

International Agents

Our international network transports, stores, tracks and delivers freight, by road, rail, sea and air across the globe, and seamlessly connects into our domestic network. International agents are engaged by Northline to contribute to our international service offering.

We have assessed the risk of the likelihood of incidence of Modern Slavery practices within our International Agent network as **unlikely but possible**.

Actions Taken to Address Risks of Modern Slavery Practices

Northline has continued to progress its Modern Slavery program including:

- *Supplier Code of Conduct*
 - Formalising and presenting our Supplier Code of Conduct to all our transport services contractor providers and PUD drivers, including requesting their acknowledgement of understanding. Our code includes but is not limited to human trafficking, forced labour, ethical business practices, child labour, debt bondage, deceptive recruitment, and domestic servitude.
- *Supplier Risk Assessment*
 - Annual review of our Risk Assessment, with further emphasis on International Agents.
- *Modern Slavery Statement*
 - Presenting our Modern Slavery statement to all our transport services contractor providers, and in our induction program for all new employees.
- *Whistle Blower Procedure*
 - Presenting our Whistle Blower Procedure to all our transport services contractor providers and requesting their acknowledgement of understanding.

Assessing the Effectiveness of Actions Taken

Relevant indicators of effectiveness of Northline actions include the number of issues or potential issues identified to management and the number of notifications raised by stakeholders to management.

Northline has not received any notifications or identified any issues. However, we will continue to remain alert to the risk of modern slavery and human trafficking in our own business and those of our business partners.

Other Relevant Information

Northline has recently participated in a version SMETA 7 Sedex 4 Pillar audit which included

- Labour Standards code areas
- Health and Safety code areas
- Environment code areas and
- Business Ethics code area.

Results of that audit were strong and confirmed our robust social management systems.

Over the next reporting period, we will continue to assess ways to reduce the risks of modern slavery including:

- Closing corrective actions in the above audit and evaluating and implementing improvement opportunities to further strengthen our social governance.
- Reviewing and improving our Risk and Opportunities Register regards social governance.
- Further develop supplier due diligence to ensure our major suppliers are maintaining appropriate levels of risk management.
- Reviewing and redrafting Northline Procurement and Purchasing procedure to ensure appropriate emphasis on major suppliers' accountability.
- Reviewing our contracts with major suppliers, and the contractor management system by which we manage them.
- Reviewing the responses of further major business partner Self-Assessment Questionnaires.
- Conducting further modern slavery awareness training for our employees involved in procurement and purchasing and key employees responsible for the sourcing of new suppliers.
- Implementing modern slavery risks into internal auditing process.

This statement was approved by all partners of Northline Partnership on 22 December 2024.



David Harford
Director
Northline Group Pty Ltd, Managing Partner of Northline Partnership