



# Modern Slavery & Human Trafficking Statement FY23

## Introduction

Modern slavery describes the most serious forms of exploitation including trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage and the worst forms of child labour.<sup>1</sup> These abuses can occur in all industries and sectors and distorts global markets and responsible business practices.<sup>2</sup>

Toll Holdings Limited, and our subsidiaries respect ethical labour practices and value diversity. Toll takes a zero-tolerance approach to any form of human rights abuses, including modern slavery in our operations and supply chains and we expect that all our employees, suppliers, subcontractors and agents uphold these values.

This statement is published by Toll Holdings Ltd (Australian registered Company Number 006 592 089) and our subsidiaries in compliance with section 54 of the United Kingdom's *Modern Slavery Act 2015* and Australia's *Modern Slavery Act 2018* (Cth). It describes the steps taken by Toll Holdings Ltd and our subsidiaries in the financial year ending 31 December 2023 to assess and address modern slavery.

## Structure, Operations & Supply Chain

### Our Structure & Operations

With over 125 years' experience, Toll operates an extensive global logistics network with direct operations in 28 countries as well as strong partnerships with agents in 150 countries. With approximately 10,000 employees around the globe, Toll provides a diverse range of freight forwarding, transport and logistics solutions covering road, air, sea and rail to help customers meet their global supply chain needs. Proudly part of Japan Post, with dual headquarters in Australia and Singapore, Toll provides a diverse range of services to customers across the world.

**International Freight Forwarding:** Toll provides a full suite of international freight forwarding solutions including air, ocean, road, rail, intermodal and multimodal, customs brokerage and clearance and specialised freight services.

**Logistics:** We provide **3PL/4PL logistics services** across the Asia Pacific region including warehousing, distribution, specialised logistics, remote and resource logistics, supply chain solutions, eCommerce, aviation services and value-added services.

Through its subsidiary, **Toll People**, Toll provides labour hire and recruitment services in Australia and places approximately 16,000 people in logistics jobs each year.

**Toll's government & defence business** provides relocation services to Australian defence personnel. Each year around 23,000 relocations are completed. In New South Wales, Toll has operated an aeromedical service since 2017 conducting approximately 3,000 helicopter rescue missions each year.

For further details of the services we offer, please refer to our website.

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<sup>1</sup> Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities

<sup>2</sup> Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities



## Our Supply Chain

To assist in the delivery of these services, Toll works with an extensive network of suppliers, subcontractors, and agents. These include the suppliers of products and services used in our transport and warehousing activities, such as trucks, planes, ships, helicopters, materials handling equipment, IT equipment and personal equipment and clothing. Our supply chain also includes the services provided by subcontractors and agents, mainly for the transport of goods. This is particularly relevant for Freight/Global Forwarding, for which Toll engages a number of third parties to assist with completing these orders<sup>3</sup>. In many cases we have long-standing relationships with these businesses, and in other cases short-term arrangements are made based on the requirements of our clients. An overview of the countries in which we operate as well as those in which we work with network partners can be seen below.

## Risks of Modern Slavery in Operations & Supply Chains

Operating in the global logistics sector, we are aware of the potential for Toll to cause, contribute to or be linked to modern slavery through our operations and supply chains.<sup>4</sup>

### Operations

Taking into account the activities of Toll's global operations, there is a risk of causing or contributing to modern slavery through the use of labour in vulnerable populations, high risk geographies or through the engagement of recruitment agencies. Whilst Toll operates worldwide, nearly half of employees and a significant proportion of suppliers are based in Australia and New Zealand which somewhat decreases the geographical risk. However, as our company continues to grow both locally and globally, we are aware of the risks and the need to address these in an appropriate manner.

### Supply Chain

Toll works with an extensive network of suppliers, subcontractors and agents to provide the vast array of services around the globe. As such, Toll is at risk of contributing to or being directly linked to modern slavery abuses relating to the activities of these business relations. The extent of these is dependent on a number of factors including the level of human rights protection and/or enforcement in the countries where they operate or source from, use of labour hire and outsourcing practices. This is also applicable to suppliers from which we source the products and services we require to operate.

## Actions Taken to Assess and Address the Risk of Modern Slavery

We are taking a long-term systematic approach to integrating an ethical supply chain framework and increasing engagement with suppliers to identify risk, assess and address modern slavery.

### Policies & Governance

Toll is committed to acting ethically and with integrity and transparency in all business dealings. Toll respects ethical labour practices and values and promotes diversity. Consistent with these principles, Toll has a zero tolerance approach to any form of modern slavery in its operations or supply chain. Modern slavery encompasses servitude, forced labour, debt bondage and human trafficking.

In line with our values are Toll's policies and standards, which influence our behaviour towards Modern Slavery:

- Toll Group Code of Practice
- Toll Group Supplier Code of Practice
- Toll Group Anti-Human Trafficking and Modern Slavery Policy
- Toll Group Anti Bribery and Anti-Corruption policy.
- Toll Group Ethical Employment Policy

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<sup>3</sup> <https://www.tollgroup.com/freight>

<sup>4</sup> Commonwealth Modern Slavery Act 2018 – Guidance for reporting entities p40



- Toll Group Health and Safety Policy
- Toll Group Driver Roadside Safe Stopping and Parking Policy
- Toll Group Domestic and Family Violence Policy
- Toll Group Background Screening Policy
- Toll Group Diversity & Equal Opportunity Policy
- Toll Group Privacy Policy
- Toll Group Procurement Policy
- Toll Group Security Policy
- Toll Group Whistleblower Policy
- Toll Group Serious Misconduct Policy

The day-to-day responsibility for developing these policies and overseeing compliance is assigned to relevant departments including Group Compliance, Group HSSE, Group HR, Group Procurement and Group Legal.

These policies and standards are upheld in everything we do. We consider that, on the whole, the implementation of our company values and policies establishes an ethical culture and environment in which knowingly allowing human slavery or abuse to enter Toll's operations or supply chain will not be tolerated. Some of these policies are publicly available on our website: Policies & Procedures ([tollgroup.com](http://tollgroup.com))

## Supplier Governance Framework

The Toll Group Supplier Code of Practice ("**Supplier Code**") sets out the behaviours Toll expects from suppliers.

This includes Toll's expectation that our suppliers will act with respect and comply with applicable employment and workplace laws and regulations, including labour and child labour laws.

The Supplier Code reserves Toll's right to audit suppliers and their operations. If a supplier fails to act consistently with the Supplier Code or specific contractual obligations, this may result in remedial action or termination of a contract. The Supplier Code of Practice is available on our website.

## Anti - Modern Slavery Program & initiatives

The Anti- Modern Slavery Program is including 5 phases as follows:

1. Establishing an Anti-Modern Slavery Steering Committee as a review panel and sounding board to develop, progress and remediate any identified modern slavery risks as a result of the actions taken under the Anti - Modern Slavery Program;
2. Collecting the relevant information and data through internal documents and interviews with key stakeholders;
3. Performing an independent risk assessment of the operations and supply chain in high risks locations as a first tier to establish a gap analysis;
4. Submitting the results to the Anti - Modern Slavery Steering Committee;
5. Developing and implementing a remediation plan to address potential gaps or issues.

On the 25<sup>th</sup> of July 2023, the Anti- Modern Slavery Steering Committee has been re-instated to progress the remediation plan and support the organization with the establishment of an adequate Anti Modern Slavery Program.

The Anti- Modern Slavery Steering Committee has been divided into working groups to review and implement corrective actions or enhancements as required to ensure strict compliance with our policies.

Toll has developed a roadmap to complete the remediation plan by end of Q3 2024.

Meanwhile, several initiatives have been undertaken during FY23 to address potential gaps related to modern slavery risks. For instance, Group Procurement is continuing the 'Fit for growth initiative" which includes responsible procurement as a key component of this initiative.



Since October 2020, Toll is a proud member of TRACE<sup>5</sup> International which is a globally recognized anti-bribery business association committed to advancing commercial transparency worldwide. TRACE International helps companies conduct business ethically and addressing compliance challenges in general including modern slavery issues. In that respect, Toll has developed in partnership with TRACE International a customized Third-Party Risk Management System to conduct Compliance Due Diligence on its agents' network globally. The Compliance Due Diligence process includes modern slavery requirements and related compliance controls to ensure the adherence to our Code of Ethics, Practice and compliance policies.

## Whistleblower Hotline

Toll's Group Whistle-blower Policy<sup>6</sup> has been updated to meet the additional requirements from the Australian *Corporations Act 2001*. The whistle-blower protections in the *Corporations Act 2001* have been expanded to provide greater protections for whistleblowers which are reflected into Toll's Group Whistle-blower Policy.

This is accompanied by regular communications to maintain internal awareness of the policy and the Toll Disclosure Hotline. This includes widespread communications, staff newsletters which are also cascaded down by Toll Business Compliance Champions network locally to overcome any language barriers. Training was also provided to relevant employees with additional information and support to those with direct obligations and responsibilities.

The Toll Disclosure Hotline enables employees and suppliers across Toll globally to anonymously report suspected misconduct, including matters relating to labour practices and human rights. It is managed by a third party which helps to maintain anonymity of whistleblowers as well as ensuring data privacy. The system also enables communication between Toll and the whistleblowers to ensure they are kept informed of the outcomes of subsequent investigations. Information on how to access the hotline is readily accessible in multiple languages to ensure all parties have equal access.

All allegations received are reviewed and appropriately investigated. Toll takes a timely and proportionate approach to implementing corrective or disciplinary actions and learnings. This includes working with managers and other relevant employees to implement necessary changes to prevent any further breaches occurring in the future.

## Training

Our ability to identify and respond to human rights issues is heavily reliant on our employees identifying and reporting potential breaches. As such, it is vital that employees have a good understanding of what human rights and modern slavery issues are; how to report them and how to address them.

Toll continues to raise awareness on modern slavery with training and e-Learning on the Code of Conduct. Our induction e-Learning modules for all employees contains sections on Modern Slavery and Human Rights, with reference to our Anti-Modern Slavery Policy.

As part of Toll's Compliance Training Program, a dedicated Anti - Modern Slavery eLearning module is being developed and will be rolled out across all Toll divisions and employees in 2024.

## Assessment & Effectiveness of our Actions

Toll recognises the importance of monitoring how effective its Anti-Modern Slavery processes are and we have actively taken steps to review our approach to assessing and addressing modern slavery risks.

With the re-instatement of the Anti- Modern Slavery Steering Committee piloted by the Compliance function, Toll is moving ahead with a clear plan to achieve our compliance goals.

In our own operations, Toll is relying on all employees to strictly comply and escalate any suspected breaches or misconduct to Toll Group Anti-Human Trafficking and Modern Slavery Policy. Toll utilises its global network

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<sup>5</sup> TRACE | Compliance Powered by Community ([traceinternational.org](https://traceinternational.org))

<sup>6</sup> Whistleblower Reports ([tollgroup.com](https://tollgroup.com))



of designated employees and experts in compliance to oversee the effectiveness of the relevant actions taken to address modern slavery.

For our supply chain partners, Toll has reinforced its Third-Party Onboarding and Compliance Due Diligence processes globally. In parallel, Toll has also implemented Compliance Standard clauses, Third Party Certification requirements and Advisories for our business partners to ensure the adherence to Toll Code of Practice, policies, and related requirements including but not limited to modern slavery.

## Our Future

Toll's Anti-Modern Slavery Program, and this statement, are a result of consultation and collaboration between many areas within Toll. These include Procurement, Legal, Agent's network, Operations, Human Resources, Health and Safety, Compliance and Security. This is testament to our shared values, policies and governance frameworks together with a belief in the importance of actions to address Modern Slavery risks.

Toll recognises the need to continuously build on our understanding, oversight and management of modern slavery risks in our operations and supply chains. We continue to build on our work from this financial year, progress the enhancements of our mitigation actions and engagement within our operations and supply chain.

This statement was approved by the principal governing body for Toll, Toll Holdings Ltd Board on 28 September 2023.

A handwritten signature in black ink, appearing to read "Alan Beacham".

**Alan Beacham**  
Managing Director  
Toll Group