



Yang Kee Group (Australia) Pty Ltd  
ACN 615 582 093

135 Boundary Road  
Laverton North, VIC 3026 Australia  
T: +61 (3) 8368 500 F: +61 (3) 8368 5333

## Modern Slavery & Human Trafficking Statement FY22

### Introduction:

Modern Slavery describes the most serious of human exploitation including trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage and the worst forms of child labour.

Yang Kee Group (Australia) Pty Ltd, and our subsidiaries, respect ethical labour practices and value diversity. Our company 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 Yang Kee Group (Australia) Pty Ltd (ABN 28 615 582 093) has been developed in conjunction and consultation with Axima Pty Ltd (ABN 28 137 065 288) and its subsidiaries. The purpose of the statement is to describe the steps taken during the FY22 Financial Year (January 2022 to December 2022) in regards to anti-modern slavery practices in accordance with section 13 of the Modern Slavery Act 2018 (Cth) (MSA).

### Structure, Operations & Supply Chain:

#### Our Structure:

Our company is part of the Yang Kee Group's global logistics business. Yang Kee Group (Australia) Pty Ltd is the Oceanic regional headquarters based in Australia, with subsidiaries operating in Hong Kong and China. Our main office is located at 135 Boundary Road, Laverton North Victoria, Australia 3026.

We employ 195 people across Australia, Hong Kong and 3 locations in China.

The organisational structure consists of a Board of Directors and a Senior Leadership Team who manage the business across the region. The Senior Leadership Team consist of Chief Executive Officer, Chief Financial Officer, Chief Operating Officer – International, Chief Information Officer – AXIMA, GM Logistics and GM People & Culture.

#### Our Operation:

We operate in 3 distinct lines of business:

- 1) **International Freight Forwarding** – exportations and importation of goods on behalf of our customers by sea freight or air freight.
- 2) **Logistics – 3<sup>rd</sup> Party Logistics** – where we manage the logistics requirements of our customers in our warehouses.
- 3) **Transport** – the movement of goods on behalf of our customers by road transport to commercial premises.

These 3 divisions within the company are supported by Shared Services of IT, HR and Finance.



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### **Our Supply Chain:**

To assist in the delivery of these services, our Company works with a network of suppliers, subcontractors and agents.

These include the suppliers of products and services used in our transport and warehousing activities, such as the provision of trucks, materials handling equipment and personal equipment, clothing and office equipment.

Our supply chain also includes the services provided by subcontractors and agents. This is particularly related to our International Freight Forwarding division, where we engage with other agents internationally to facilitate the import/export of goods on behalf of our customers.

In the majority of instances, we have long term business relationships with these organisations. At times, we may work with agents requested by our customers.

### **Risks of Modern Slavery in Operations & Supply Chains:**

Operating in a global logistics sector, we are aware that there is a risk of unknowing involvement in modern slavery practices.

We understand that with an element of 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 or labour hire agencies. With the majority of employees and suppliers being based in Australia, we believe that the geographical risk is lowered. We do have an off-shore business process relationship (OBP) with team members in Manila (Philippines).

Our company has a business relationships with an extensive network of suppliers, subcontractors and agents to support/facilitate the movement of freight globally. As such our company 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 protections and/or enforcement in the countries where they operate or source from, use the products and services we require to operate.

### **Actions Taken to Assess and Address the Risks of Modern Slavery:**

We are taking a clear and long-term approach to assess and address the risks of modern slavery within our work sphere. This involved the reviews of current and new suppliers in relations to anti-modern slavery practices. Review of procurement practices. Review of current policies that are related or interdependent with the anti-modern slavery policy, and review of internal training and awareness of anti- modern slavery practices.

Specifically, actions have included:

- Review of Operations and Supply Chains
- Procurement practices, including the review of engagements for temporary labour hire workers and recruitment practices.
- Review of existing suppliers including BPO, who have demonstrated strong commitment to ethical practices.
- Reviews of internal practices – including recruitment, wage and salary reviews, adherence to requirement terms and conditions, workplace laws and regulations.

To date we have not identified practices requiring remediation. Key elements have been in understanding practices and sharing knowledge and education.

### **Assessing effectiveness of actions**

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward.

Initial planned steps moving forward to assess effectiveness of actions are:

- Independent review of occupational health and safety policies
- Increased and improved reporting on incidents and risk

### **Policies & Governance:**

To support our Anti-Modern Slavery policy, our company operates with the following related and interdependent policies.

- Code of Conduct
- Respectful Workplace Policy
- Privacy Policy
- Health & Safety Policy
- Diversity Policy
- Whistle-blower Policy
- Company & Information Privacy Policies

The day-to day responsibility for developing these policies and overseeing compliance is assigned to relevant departments and the Senior Leadership team. These are the guiding protocols in relation to dealing with our people, as well as interactions with suppliers, subcontractors and agents.

### **Next Steps:**

In FY23, we will continue to build on the current platform and put further measures in place to record progress.

We will continue to expand our E-learning platform to increase awareness through induction/education programs including those relating to Modern Slavery and Human Rights. We will further educate and promote the elements, and policies in place for the creation of better workplace and global environment – along with the steps in place around Whistle-blower actions.

In FY23 we will continue to improve documentation for any new supplier relationships /contracts, ensuring they are consistent with the provisions of the Modern Slavery Act 2018.



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Finally, we undertake to manage any allegations or concerns around modern slavery practices to be received professionally and investigated appropriately – with actions put in place to prevent further breaches from occurring.

This statement has been approved by our principal governing body, which is a Sole Director. Our sole director is Sandra Fairchild and the statement was approved on the 1<sup>st</sup> September 2023.

Signature:

**Sandra Fairchild**  
*Chief Executive Officer – Yang Kee Group (Australia) Pty Ltd*

Date: 01/09/2023