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MODERN SLAVERY STATEMENT (1 JULY 2023 – 30 JUNE 2024) BRL HOLDINGS PTY LTD (ABN 79 067 554 563)

1. INTRODUCTION AND REPORTING ENTITY

- 1.1 Modern slavery is defined under the *Modern Slavery Act 2018* (Cth) to include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour. This is a global issue where offenders use coercion, threats or deception to exploit their victims. Worldwide, approximately 50 million people live in modern slavery – of which a quarter are children – with the majority of exploitation occurring in the Asia-Pacific and African regions. Modern slavery is an issue which challenges all nations and, with an estimated 41,000 people in Australia living in slavery, all businesses must play a part in stopping it.
- 1.2 The reporting entity, BRL Holdings Pty Ltd (ABN 79 067 554 563) t/as Land Transport (**Land Transport**), is a company committed to minimising the risk of modern slavery in its operations and supply chains and meeting its obligations under the *Modern Slavery Act 2018* (Cth). Land Transport does not own or control another entity.
- 1.3 Land Transport does not tolerate modern slavery in its business operations or extended supply chains and this approach is in line with our purpose, values and ethics of responsible business operation.
- 1.4 This statement describes the steps Land Transport has taken to assess modern slavery risks within its operations and supply chain during the period from 1 July 2023 to 30 June 2024, and details the actions being taken to address these risks.

2. STRUCTURE AND OPERATIONS

- 2.1 Land Transport is headquartered in Toowoomba, Queensland, and provides logistics services throughout Australia including transport, warehousing and distribution services. The business currently employs about 280 members of staff and operates a fleet of approximately 110 prime movers, 80 body trucks and 335 trailers.
- 2.2 Land Transport has depots located in cities and regional towns throughout Queensland, New South Wales and Victoria, as well as in Adelaide and Perth, as part of its domestic based operations.
- 2.3 Land Transport offers a range of transport and logistics services, including both interstate and intrastate deliveries of goods to businesses throughout Australia.

3. SUPPLY CHAINS

- 3.1 Land Transport sources goods and services from many suppliers located in cities and towns throughout Australia. In total we dealt with approximately 170 vendors during the financial year ended 30 June 2024. These suppliers provide products and services used in our transport business including:
- (a) capital plant and equipment, mostly comprising prime movers, trailers, body trucks, forklifts and spare parts used in maintaining capital plant and equipment;
 - (b) fuel;
 - (c) IT hardware, software and electronics;
 - (d) cleaning services;
 - (e) gardening and rubbish services;
 - (f) uniforms and personal protective equipment; and
 - (g) professional service providers such as accountants, lawyers and engineers.
- 3.2 Land Transport seeks to source quality equipment and services from reputable local suppliers around Australia.
- 3.3 Land Transport occasionally uses overseas suppliers, but this is relatively rare. Major capital purchases are almost always made through Australian owned and operated dealers. All professional services are provided by Australian businesses.
- 3.4 Land Transport also works with a large network of subcontractors. Approximately 10% of Land Transport's work during the relevant period was performed through subcontractors. Currently, Land Transport uses approximately 160 subcontractors and works with about 200 freight forwarding businesses. The steps we have taken to reduce modern slavery risks with respect to subcontracting are discussed below.

4. RISKS OF MODERN SLAVERY IN OPERATIONS AND SUPPLY CHAINS

- 4.1 Land Transport is aware of the potential that it may contribute to or cause modern slavery through its supply chains and operations.
- 4.2 According to the Global Slavery Index published by Walk Free, the imports of electronics (eg mobile phones), garments and solar panels into Australia pose the greatest risk of modern slavery, in dollar terms, among the products imported into Australia.¹ In the main, these products are sourced from China, Bangladesh, India, and East Asia.²
- 4.3 Based on a review of its records, Land Transport has no direct relationship with any suppliers of electronics, garments or solar panels in any of these countries. Land Transport therefore considers that its relationships with current suppliers are unlikely to create risks with respect to modern slavery.
- 4.4 The supply chains which carry the most risk are those where Land Transport has less visibility regarding where the suppliers are sourcing goods. Land Transport is aware that some of its

¹ Walk Free, 'Country Study – Modern Slavery in Australia', *Global Slavery Index* (2023)
<https://www.walkfree.org/global-slavery-index/country-studies/australia/>

² World Integrated Trade Solutions (2022) *Australia Mach and Elec Imports by country & region 2022 | WITS Data*;
Australia Textiles and Clothing Imports by country 2022 | WITS Data

uniform suppliers may source uniforms from overseas (although the uniform suppliers themselves are based in Australia). In addition, when Land Transport sources goods such as mobile phones, telematic devices, tyres and batteries from Australian suppliers who in turn purchase from overseas, there is a higher risk of modern slavery occurring in the supply chain due to the lack of visibility over the supplier's operations.

5. ASSESSING AND ADDRESSING MODERN SLAVERY RISKS

- 5.1 Land Transport has a Modern Slavery Policy in place, which is available to its staff in its Workplace Handbook and on request to suppliers and customers. This policy applies to Land Transport's employees, contractors and suppliers. It requires Land Transport's officers and employees to be vigilant in identifying risks of modern slavery, and to report any circumstances that suggest a risk of modern slavery to the executive team, including remediation of any modern slavery in its operations or supply chains.
- 5.2 Land Transport's Workplace Handbook is used in engaging suppliers, which requires suppliers to make commitments regarding compliance with modern slavery laws, anti-discrimination and employment laws. In addition, Land Transport does not allow its subcontractors to further subcontract any services without prior written consent, thereby ensuring that Land Transport maintains visibility with respect to parties in the supply chain and allows it to perform any screening or due diligence on prospective subcontractors if necessary.
- 5.3 Land Transport sometimes uses labour hire companies to meet staffing requirements. Labour hire presents risks because of reduced visibility with respect to any recruitment or remuneration practices and conditions of engagement. Where labour hire providers are engaged, Land Transport conducts a due diligence process to ensure that any required labour hire licence is held by the labour hire provider.
- 5.4 Land Transport also has a range of other policies in place which may influence attitudes and behaviour throughout its supply chains, including:
 - (a) Code of Conduct;
 - (b) Chain of Responsibility Policy;
 - (c) Diversity and Equal Opportunity Policy;
 - (d) Prevention of Workplace Bullying Policy;
 - (e) Prevention of Workplace Discrimination Policy;
 - (f) Whistleblower Policy; and
 - (g) Workplace Health & Safety Policy.
- 5.5 Land Transport's policies and procedures are regularly reviewed and updated when necessary.
- 5.6 Staff will receive in-house training on all Land Transport policies and procedures, including the Modern Slavery Policy.
- 5.7 All of Land Transport's contracts with subcontractors now contain clauses requiring the subcontractor not to engage in any conduct that may amount to modern slavery, and to do everything reasonably required to reduce the risks of modern slavery in their supply chains. Subcontractors must also notify Land Transport of any possible, potential, suspected or actual breach of modern slavery legislation.

- 5.8 Whistleblower disclosures are managed via Land Transport's Whistleblower Policy, allowing confidential disclosure of issues with respect to, inter alia, modern slavery risks.
- 5.9 Land Transport will take all reasonable steps to ensure that what they are buying is not a product of modern slavery including making prudent inquiries to identify the source country and mitigate and address any modern slavery risks and harm in the supply chains.

6. HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS

- 6.1 Land Transport may, from time to time, request information from suppliers regarding their modern slavery practices. Suppliers are expected to work with Land Transport and provide reasonable assistance to demonstrate compliance with Land Transport's Modern Slavery Policy. Failure to comply with Land Transport's Modern Slavery Policy may result in termination of Land Transport's relationship with a supplier or other entity.
- 6.2 As set out in paragraph 5.7, Land Transport has recently added modern slavery clauses into its agreements with subcontractors. The effectiveness of this measure will be assessed going forward by consulting with subcontractors and requesting information regarding their modern slavery practices.
- 6.3 Land Transport, moving forward, proposes to continue to engage with its suppliers and subcontractors to address modern slavery risks. Land Transport intends to investigate the steps being taken by its major suppliers to reduce the risks of modern slavery by reviewing the policies and Modern Slavery Statements of its most significant suppliers. Land Transport will also continue including modern slavery compliance clauses in contracts and will be supplying copies of its Modern Slavery Policy to suppliers. It will also collaborate with the community, business peers, its staff and government entities about how it is addressing the risks of modern slavery, through participation in community engagement, and in the future prepare a modern slavery risk management plan to commit to continuous improvement and track effectiveness.

7. APPROVAL

- 7.1 This statement was approved by the sole director of Land Transport, on 6 December 2024



Barry James Land

Sole Director
BRL Holdings Pty Ltd