



Modern Slavery Statement 2021



Contents

Introduction	3
FY21 key highlights	5
About LINX Cargo Care Group	6
Our vision and mission	6
Reporting entity structure	7
Our operations	7
Our supply chain and policy framework	9
Our policies and procedures	10
Progress on our key Modern Slavery actions	11
Ongoing impacts of the COVID-19 pandemic	13
Workforce Enterprise Bargaining Agreements	13
2021 high risk focus categories	14
Fuel and Lubricants	14
PPE and Safety Equipment	14
Security Services	14
Site Cleaning and Janitorial	15
Temporary Labour Hire	15
Employee tools for reporting of Modern Slavery concerns	16
Our focus into 2022	17
Effectiveness assessment	18
How this statement was prepared	19

Introduction

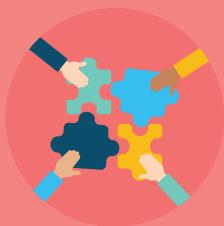
LINX Cargo Care Group acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past and present.

Our **Group's Values**



Be Brave, Be Bold

Reach further, think bigger, dive in and shake things up.
We challenge ourselves and we challenge each other to do better.



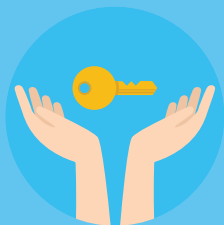
We Are One

We are stronger when we work together. We leverage our collective strengths to achieve and deliver more for our customers, and each other.



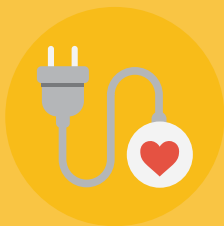
Home Safely, Every Day

Be Safe, Be Aware, Speak Up, Live and Breathe it. No excuses. We don't compromise on Health and Safety.



Act Like You Own It

Driven to get the best results for our customers and our business. We step up, Take ownership, and deliver on what we promise, and we're proud of it.



Powered By People

Respected, Valued and Inspired. We invest in our People and our Communities for the future.

LINX Cargo Care Group (LINX CCG) values human rights and is committed to ensuring that all business is conducted according to ethical, professional, and legal standards in a fair, honest and open manner.

The Modern Slavery Act 2018 (Cth) (the Act) establishes Australia's national modern slavery reporting requirement. Under the reporting requirement, commercial and not-for-profit entities with annual consolidated revenue of at least AUD \$100M, must publish annual Modern Slavery Statements describing their actions to assess and address modern slavery risks.

As an Australian organisation with entities generating revenue beyond that threshold, LINX CCG has prepared its Modern Slavery Statement in accordance with the requirements of the Act and the FY21 reporting requirements.

This statement has been prepared by LINX CCG to meet the requirements of the Act for the financial year ending 31 December 2021 (FY21).

This statement covers the activities of LINX CCG and the entities owned and controlled within the Group.

In our business practices, we strive to apply our values and business principles which reflects our continued commitment to not use forced, compulsory, trafficked or child labour within our Group.

In 2021, we continued to assess and address the risk of modern slavery across our workforce, operations and supply chains. Our existing policies and procedures, as described in our first modern slavery statement, are set out on page 10. The *LINX CCG Anti-Slavery and Human Trafficking Policy*, applies to all directors, officers and employees, forming the foundation of our approach to manage human rights risk. The policy details our commitment to respect the internationally recognised human rights of our employees, the communities in which we operate, those who may be impacted by our activities and those within our supply chain. It sets out a clear statement of our prohibition of the use of all forms of slavery, child or forced labour within our operations and the operations of our suppliers. The policy also includes specific commitments and ongoing actions to identify, prevent and mitigate any adverse impacts of our activities and provides access to remedy through effective grievance mechanisms.

FY21 key highlights

Our due diligence is an ongoing and iterative process of identification, prevention and mitigation that considers both actual and potential adverse human rights impacts through our activities and supplier and business relationships.



Updated framework around Third Party Due Diligence.



Ongoing in-depth review of tier 1 and key tier 2 supply chain.



Revised threshold levels across key higher risk modern slavery categories.



Continued to review the effectiveness of our external risk screening software.



Incorporated contractual obligations regarding compliance with the Act in key LINX CCG contracts and standard purchase order terms and conditions.



Modern Slavery training broadened to include other corporate staff in the Australian and NZ operations.



Continued regular engagement with suppliers, through tender processing, contract negotiations, contract management meeting and vendor onboarding due diligence reviews.



Enhanced the Procurement process to identify and implement areas of improvement.

About LINX Cargo Care Group

LINX CCG is a diversified logistics provider, offering a range of services including rail and road haulage, warehousing, stevedoring, forestry related logistics services and finished vehicle processing, storage and transportation. The Group comprises five businesses LINX, Autocare Services, C3, Pedersen Group and GeelongPort (50% owned).

Our Group brings together the capabilities of five market-leading operations built on more than 100 years of ports and logistics experience. Together LINX, Autocare Services, C3, Pedersen Group and GeelongPort employ more than 3,000 people across Australia and New Zealand. LINX CCG is owned by a consortium of shareholders, with Brookfield Infrastructure Partners, the majority shareholder.

Our vision and mission

Our **Group's Vision** is

Delivering a connected supply chain, one move at a time.

Our Vision is the aspiration of what we want to achieve in the future, what our customers expect from us, and the role each of our people play to deliver integrated supply chain and logistics solutions.

The people at LINX CCG play an important role in delivering a connected supply chain for our customers, communities and themselves. A connected supply chain is what our customers and industry desire, to seamlessly and efficiently deliver goods and we achieve this together – one move at a time.

Our **Group's Mission** is

Safely working together to keep the supply chain moving for our customers and communities.

Our Mission is what we achieve every day – what we do and how we do it. There is nothing more important than our people going home safely every day. Working together safely to deliver to our customers and communities is not negotiable.

Reporting entity structure

BAPSH Pty Ltd (**BAPSH**) is the principal governing body (as that term is defined in the Act) within the LINX CCG corporate structure whose primary activity is that of a holding company. BAPSH makes this statement for and on behalf of the reporting entities (as that term is defined in the Act) within the LINX CCG¹. As a holding company, BAPSH does not manage supply chains or procure any goods or services.

For consultation purposes, the LINX CCG reporting entities have the same company secretary and there are some common directorships across reporting entities. This statement has been reviewed and approved by the directors of each reporting entity.

Whilst there are several reporting entities for which this statement is required in accordance with the Act, this statement sets out how we manage modern slavery risks across the whole of the LINX CCG.

Our operations

Our operational footprint includes more than 60 corporate and operational sites situated in the majority of Australia and New Zealand's capital cities, plus other regional areas.



LINX's combined capabilities across rail and transport logistics and stevedoring enable the provision of flexible, customer-focused supply chain solutions. LINX employs more than 1,000 people around Australia. LINX employees comprise stevedores, truck drivers, tradespeople (e.g. mechanics, electricians), machinery operators (e.g. forklift), crane operators, warehouse operators, yards people, administrators, supervisors and managers.



Autocare Services is a national service provider in the automotive industry. Autocare operates off-wharf facilities and delivers IT solutions, transport and storage services for vehicles nationally. Autocare employs more than 450 people around Australia. Autocare Services employees comprise truck drivers, vehicle processors, planners, tradespeople, fleet builders, yards people, administrators, supervisors and managers.

¹ The reporting entities within the LINX CCG include Autocare Services Pty Ltd, LINX Port Services Pty Ltd, LINX Care Group Holdings No.2 Pty Ltd and BAPSH Pty Ltd are each holding companies. The BAPSH Directors are not involved in the day-to-day operations of the businesses within the LINX Cargo Care Group.



For more than 65 years, C3 has been New Zealand's largest on-port services provider and has established operations in Australia specialising in forestry-aligned logistics. C3 is a leading provider in product handling solutions, on wharf and beyond, working in partnership with exporters, importers and shipping lines across New Zealand and Australia.

Our services include log harvesting, haulage, log marshalling and log stevedoring, as well as general cargo handling, warehousing, container consolidation and transportation. C3 employs more

than 1,400 employees across Australia and New Zealand. C3 employees comprise truck drivers, machine operators, tradespeople (e.g. mechanics, fitters), log scalers, log marshallers, stevedores, yards people, administrators, supervisors and managers.



Pedersen Group is a market leading specialist provider of wood chipping and woodyard management services to pulp and paper mills in Australia and New Zealand. Pederson employs more than 130 people across three operating sites, handling millions of tonnes of fibre annually for major global forestry organisations. Pedersen Group employees comprise machine operators (mobile plant and fixed plant), truck drivers, tradespeople (e.g. mechanics, fitters), log scalers, administrators, co-ordinators, supervisors and managers.



GeelongPort is 50% owned by LINX CCG but controlled by a separately constituted board. Accordingly, it is not owned or controlled by LINX CCG. During the course of 2021, however, GeelongPort was included in many of the initiatives set out in this statement as LINX provided a range of corporate services to GeelongPort during the reporting period. Accordingly, it has been included in the description of risk and actions taken by LINX CCG.

Additionally, each operation is supported by dedicated and/or LINX Cargo Care Group resources which provide functional support across IT, Finance, Risk, Procurement, HR, HSE, Legal, Commercial, Business Development and Payroll.

Our supply chain and policy framework

Our suppliers are predominantly Australian and New Zealand based companies although some of the goods supplied originate from other countries. Less than one per cent of our suppliers are based outside of Australia and New Zealand and these suppliers are predominantly located in Europe, Asia and North America.

The LINX CCG spend is distributed across approximately 4,500 (as of 2021) active vendors and a range of goods and services are sourced across multiple supply categories. Key categories include: fuel and lubricants, plant and vehicles, property repairs and maintenance, transport subcontracting, business services and consultants, electricity and utilities, and IT and telecoms.

We have also assessed the potential for our business to cause, contribute to, or be directly linked to modern slavery via our supply chain. Given the nature of our procurement categories and practices as described in further detail below, it is unlikely that we have caused or contributed to modern slavery in our procurement of goods or services during the reporting period. There is, however, the latent risk that we may be connected to modern slavery practices through the activities of our suppliers and their supply chains.

Location of tier-1 suppliers to our operations



● Third Parties

Our policies and procedures



✓ LINX CCG Anti-Slavery and Human Rights Policy

This policy applies to all of our employees. We have a zero-tolerance approach to all forms of modern slavery within our business and supply chain.



✓ Code of Conduct and Business Ethics

Our *Code of Conduct and Business Ethics* applies to all officers, employees, and temporary workers. It clearly states our commitment to, and expectations of, conducting business in an ethical and responsible manner and prohibiting child and other forced labour.



✓ Procurement Policy and Processes

The *Procurement Policy and Processes* describe the approach for sourcing, exercising due diligence and monitoring new and existing suppliers with the intention of managing risks including modern slavery. It applies to all of our employees.



✓ Vendor Management Framework

The procedures included in the Vendor Risk Management Framework provide the foundation for both the onboarding and ongoing monitoring of suppliers across multiple risk categories including, modern slavery.

Progress on our key Modern Slavery actions

In 2021 LINX CCG continued to utilise a risk-based framework to assess, manage and mitigate modern slavery risks within its supply chain. This combines both internal and external platforms to undertake assessment on all suppliers to determine the appropriate course of action.

From a continuous improvement perspective, LINX CCG has updated key elements of this framework for 2021, and this included lowering the thresholds of what deems a higher risk supplier to ensure greater coverage and analysis of all the risks.

We regularly review our internal procedures to improve our approach to addressing, mitigating and preventing the risk of modern slavery occurring within our supply chain. We strive to embed human rights considerations in our procurement processes. Our key suppliers are risk assessed and confirm their compliance with our Anti Slavery and Human Trafficking policy.

Action	Key Focus Area	Status	2022 Action
Risk-based assessment conducted for all tier 1 suppliers	Analysis of all tier 1 suppliers and categorisation based on those with higher perceived risk	Completed	Continued focus on categorisation and further refinement of risk-based approach
Risk-based assessment conducted for all tier 2 suppliers	In depth review of tier 2 supply chain across the operations	Completed for key 2021 focus categories, and ongoing into 2022 for all other categories	Continued focus into the broader supply chain and tier 2 suppliers. Focussing on broader categories of risk and mapping through these
Enhancement of overall Modern Slavery risk assessment framework	Review of existing categorisation and threshold levels to ensure ongoing management of key risks	Completed	Continued refinement of the matrix and ongoing enhancement to ensure best practise in overall supply chain analysis
Revision of Group Procurement Policy to include Modern Slavery requirements	Updating of key policies and documents	Initial work completed and ongoing into 2022	Further refinement to be undertaken as part of a greater review and update of the framework through 2022

Action	Key Focus Area	Status	2022 Action
Addition of modern slavery clauses into new supply agreements	Development and inclusion of modern slavery clauses into all standard supply and services agreement templates	Completed	Ongoing refinement and updating of clauses for higher risk supply engagement as required
Revision of LINX CCG standard purchase order terms and conditions	Inclusion of modern slavery clauses into LINX CCG standard purchase order terms and conditions	Completed	Ongoing refinement and updating of clauses as required
Updated framework around third party due diligence	Update of policy covering key modern slavery processes including what to do in case of suspected or actual modern slavery within our operations	Completed	Ongoing refinement and updating as required
Sustainability Committee	In the reporting period, we focussed on the ever changing Environmental, Social and Governance (ESG)/ sustainability landscape with a focus on human rights	Completed	Ongoing refinement and updating as required
Extended Modern Slavery Training program to employees	Trained Procurement and Risk teams to use the MSQ on the Ethixbase (risk analytics software) platform as a key part of our modern slavery due diligence program	Completed	Training program to remain ongoing and built into all new employee onboarding requirements. Annual refresher training to also be conducted
	Extended modern slavery compliance training to a broader set of corporate employees	Training Rolled out	

Ongoing impacts of the COVID-19 pandemic

Throughout 2021 LINX CCG experienced ongoing supply chain disruptions due to the COVID-19 pandemic. The effects of this were seen through both material shortages as well as flow on effects into the labour markets.

Labour shortages were seen primarily within the temporary labour hire markets but also within supply categories including Site Cleaning and Security Services. To continue operations and customer services, LINX CCG was in many cases required to expand its supplier base to ensure coverage. The net effect of this was a larger supplier pool requiring Modern Slavery Assessment.

Workforce Enterprise Bargaining Agreements

A large part of LINX CCG frontline workforce is unionised with employment terms governed by Enterprise Agreements. Over the past 12 months many of these agreements have been renewed and renegotiated, to ensure the ongoing low risk nature of modern slavery amongst our employee population.



2021 high risk focus categories

Given the complexity and diversity of the LINX CCG supply chain, in 2021 priority was given to key categories of supply deemed to be at the highest risk of modern slavery. These are:



Fuel and Lubricants



Site Cleaning and Janitorial



PPE and Safety Equipment



Temporary Labour Hire



Security Services

Against each of these categories LINX has utilised extensively its external Ethixbase assessment platform to understand its suppliers tier 2 operations and how they are sourcing their raw materials as well as goods and services.

Fuel and Lubricants

LINX CCG has a direct tier 1 long standing relationship with one of the major fuel and lubricant suppliers within Australia. This agreement was recently extended and included provision of modern slavery requirements into the key agreements. In addition, this supplier has their own robust modern slavery mitigation process and detailed reporting in place. LINX CCG has reviewed and assessed this and deemed that the overall risk given these controls is relatively low.

PPE and Safety Equipment

By nature of the tier 2 and 3 supply origins, this category presents as a substantial modern slavery risk. At present LINX purchases from a large group of suppliers across Australia and New Zealand with many informal agreements in place. A review has been undertaken and a formal tender process will be conducted within 2022 and will focus heavily on long term supply coupled with modern slavery supply chain risk mitigation.

Security Services

LINX CCG also has a long-term agreement with one of the major security firms within Australia. This supplier by nature of their size and operations has a robust modern slavery mitigation process in place, with particular focus on ensuring only accredited and qualified staff are engaged for the services.

Site Cleaning and Janitorial

During 2021 LINX CCG finalised an extensive tender process and appointed a national provider to undertake cleaning services across both its operational and office sites. The tender process focussed heavily on modern slavery risks within this category and the final agreement includes detailed provisions covering this.

Temporary Labour Hire

Over the past 18 months LINX CCG has undertaken an extensive tender process covering both white collar and contingent labour hire. The outcome from this process are approved supplier panels allowing for ongoing labour hire across the operations with a detailed modern slavery provision within those agreements.

We periodically review and revise our procedures to improve our assessment approach to address, mitigate and prevent the risk of modern slavery occurring within our supply chain.



Employee tools for reporting of Modern Slavery concerns

As part of the Modern Slavery Training Program all employees are trained on what to do if they encounter or suspect an instance of modern slavery either within their operators or the greater supply chain. These include any of the following ways to report their concerns:

- to their immediate supervisor;
- to their relevant HR representative;
- to the LINX Procurement Team; or
- to any of the senior leadership team.

Alternatively, LINX CCG has an anonymous Ethics Hotline which is available for LINX CCG employees, vendors and any other interested parties to anonymously report any matters relating to unethical business conduct or violations of laws including modern slavery. The Ethics Hotline is available toll-free, 24 hours a day, seven days a week and may be accessed by phone or by internet.

The Ethics Hotline is managed by an independent third party and allows anyone to call anonymously to report in English and other languages. Hotline details are included in Master Service Agreements and communicated to all our vendors.

We continue to monitor the reports made through our Ethics Hotlines to ensure that we did not receive any reports of actual or suspected violations of our Human Rights Policy during the reporting period.

Our focus into 2022

LINX CCG is committed to continuous improvement in its focus to identifying and assessing Modern Slavery risks across its supply chains. Our aim each year is for our processes to evolve to ensure our visibility of the lower tiers of the supply chain increases, and strengthens our overall approach.

In 2022 our key focus will include:

- Further refinement of our Risk Assessment tool.
- A continued review of categories within our supply chain deemed as high risk, and the attributed spend thresholds.
- Continued focus on Tier 2 supply chains and mapping of these.
- Broadened roll out of the Modern Slavery training program to include additional employees across the Australian and New Zealand operations.
- Ongoing monitoring of our high-risk focus categories and ensuring any new vendors within these are managed accordingly.
- Further integration of modern slavery process and compliance into the transport subcontracting category.
- Human Rights Due Diligence program assessed by our Sustainability Committee.
- The nature of the international shipping industry creates challenges for regulators to provide comprehensive surveillance over a shipping company's practices. A number of modern slavery risks have been identified in the international shipping industry. There is a risk that we could contribute to or be directly linked to modern slavery through arrangements with charter vessels who may use exploited labour practices and who may also have modern slavery risks in their own supply chains. We will review shipping industry risks and how our operations cause, contribute to, or could be directly linked to modern slavery through association with shipping agents, on an ongoing basis.

Effectiveness assessment

We continue to focus on evolving our approach to modern slavery to ensure that we are able to identify and address all inherent risks within our supply chain. And within this ensuring that our overall approach is effective.

We continue to assess the effectiveness of our approach through:

- Continued engagement with our key higher risk suppliers to ensure continued compliance with our policies and processes and the completion of our questionnaires. Ongoing engagement with internal stakeholders and departments including legal, insurance and risk, procurement, and the Senior Leadership Team.
- Further strengthening of supplier evaluation criteria around modern slavery risk and the embedding of additional modern slavery risk management tools within the tender process.
- Continued training of our employees around Modern Slavery Act compliance and what is required of them.
- In the reporting period, we focussed on the ever changing Environmental, Social and Governance (ESG)/sustainability landscape with an emphasis on human rights which is a focus area of our Sustainability Committee.
- Our due diligence is an ongoing and iterative process of identification, prevention and mitigation that considers both actual and potential adverse human rights impacts through our activities and supplier and business relationships.

How this statement was prepared

At each step of the statement drafting process engagement and review has been held with different teams within LINX Cargo Care Group from Legal, Procurement, Finance and Risk. The process, policy and statement has been presented to the Group Senior Leadership team.

This LINX CCG Modern Slavery Statement has been approved by the LINX CCG Chief Executive Officer and Board.

Brett Grehan

LINX Cargo Care Group CEO

29 June 2022



Jonathon Sellar

Chairman – BAPSH Pty Ltd

29 June 2022

