



FY23 Modern Slavery Statement

1. About this statement

This Modern Slavery Statement (“Statement”) is a joint statement for the reporting period ended 31 March 2023 for the following two reporting groups and their respective reporting entities:

Strait Link Australia Holdings Group

- Strait Link Australia Holdings Pty Ltd (ACN 649 001 409);
- Strait Link Australia Pty Ltd (ACN 649 026 059); and
- Strait Link Shipping Pty Ltd (ACN 138 616 645)

Strait Link QS Holdings Group

- Strait Link QS Holdings Pty Ltd (ACN 649 023 638); and
- Strait Link QS Pty Ltd (ACN 649 025 614)

For the purposes of this Statement, these amalgamated entities are referred to as the Strait Link Shipping Group. Throughout this Statement the terms ‘Strait Link’, ‘we’ and ‘our’ are used to refer collectively to the above entities within the Strait Link Shipping Group unless otherwise stated.

Each reporting entity is an Australian private company.

This is the first independent modern slavery statement made by Strait Link pursuant to the *Modern Slavery Act 2018* (Cth) (Act). The Strait Link reporting entities were previously reported under the Toll Global Express’ (now Team Global Express) modern slavery statement for the reporting period ended 30 June 2022.

The Strait Link Statement outlines the actions we have taken during the reporting period to identify and address modern slavery risks across our supply chain and operations. This Statement also outlines our plans for the next reporting period.

Following the change of ownership of the shipping business in 2021 and a restructure in 2022, we have been focused on the transformation of the shipping business and are in the formative stages of developing our modern slavery program of work as a standalone business.

The respective Board of Directors for Strait Link Australia Holdings Pty Ltd and Strait Link QS Holdings Pty Ltd have reviewed and approved this Statement, and it is signed by a director for each reporting group.

2. Our Structure, Operations and Supply Chains

Our structure and operations

Strait Link operates as a corporate group headquartered in Australia and offers domestic sea and road freight and associated logistics services connecting Tasmania and mainland Australia markets. With two purpose-built vessels servicing Bass Strait six days a week between Port Burnie in Tasmania and the Port of Melbourne in Victoria and a fleet of prime movers, we move containers, refrigerated containers, trailers and vehicles.

The reporting entities share common directors with a leadership team that manages the shipping and logistics business on an integrated group-wide basis. Our shared governance framework provides a centralised approach to assessing and addressing modern slavery risks across all our reporting entities.

As at 31 July 2023, our total direct workforce in Australia was 485 employees, and of that 92% were male and 8% female with 100% of employees based in Australia. Of the 485 employees, 411 were employed full time, 47 were part-time employees and 27 in casual employment.

Our supply chain

In our business, we work with a network of suppliers and subcontractors.

During the reporting period, Strait Link procured approximately \$300 million of goods and services from approximately 200 direct suppliers, including circa 20 subcontractors. Approximately 99.5% of our total spend was with direct suppliers located in Australia.

Our procurement activities are generally managed by our commercial and operations teams. Our key categories of procurement during the reporting period included:

- indirect labour and recruitment
- subcontractors providing logistics services
- fuel and oil
- property services, including cleaning, security and maintenance
- tyres, spare parts and equipment
- workwear and personal protective equipment (PPE)
- print, packaging and promotional materials
- IT support services and hardware

We acknowledge that our direct suppliers may have operations in - or may source goods or services from - other jurisdictions which may have a higher risk for modern slavery.

3. Modern Slavery Risks

The Australian Government defines modern slavery as ‘situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.’ Modern slavery practices include trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

We recognise there are a range of factors that may shape our modern slavery risk profile, including the below:

- *vulnerable populations* – groups of people such as migrant workers who may be more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations.
- *high risk categories* – products and services regarded as having more significant inherent modern slavery risk – including industries that rely heavily on low-skilled labour and/or involve dirty, dangerous and difficult work.
- *high risk geographies* – countries or regions which are known to have higher modern slavery and broader human rights risks.
- *high risk business models* – such as business models that rely on third parties for the provision of services, often labour hire.

During the reporting period, we did not identify any instances of modern slavery in our operations or supply chain. However we understand that we could also face modern slavery risks through our customer network by transporting or storing items produced using modern slavery. Our Statement for the reporting period ended 31 March 2023 is made in accordance with the Act and therefore focuses on operational and supply chain risks.

Supply Chain Risks

During the reporting period, Team Global Express (“TGE”) (a related entity) completed a hotspot analysis of inherent modern slavery risks in their supply chain. Even though Strait Link was not specifically included in this review, there are a significant number of Strait Link suppliers that are shared with TGE.

TGE’s hotspot analysis identified the following supplier categories with indicative inherent modern slavery risks in their supply chain:

- property services, including cleaning and security
- print, packaging, and promotional materials
- fuel and oil
- workwear and personal protective equipment (PPE)
- travel and entertainment
- IT support services and hardware
- tyres
- indirect labour and recruitment, including subcontractors

It is intended that Strait Link will undertake its own independent assessment to further understand and manage these risks and is the process of engaging an external human rights and modern slavery adviser to help support this work.

Strait Link recognises that these may not be the only areas of modern slavery risk in our supply chain, and that modern slavery risks change over time, and we will continue to assess our supply chain risks.

Operational Risks

We consider there to be a lower risk of modern slavery in our direct workforce due to our level of control and visibility over working environments. The direct employees of our reporting entities are based in Australia and are engaged under employment contracts, or for relevant frontline employees, Enterprise Agreements approved by the Fair Work Commission. All employment arrangements are governed by applicable law and employment standards.

We acknowledge that there is an inherent risk of modern slavery in our indirect workforce (e.g. contractors, sub-contractors and labour-hire arrangements), which is classified as a high-risk business model as we do not have a direct employment relationship with these workers.

4. Actions to Assess and Address Modern Slavery Risks

We are committed to the highest standards of ethical behaviour in the conduct of our business dealings.

We have in place a range of policies and practices that set the standard of behaviour expected of directors, employees, contractors, and third parties (where applicable).

A summary of the key policies relating to our management of modern slavery is set out below.

Policy	Description
Anti-bribery and Corruption Policy	This policy sets out our zero tolerance of bribery and corruption and outlines the expectations of directors, employees and third parties to act in accordance with the highest standards of ethical behaviour and to not engage in, and actively prevent, all forms of bribery and corruption.
Anti-human Trafficking and Modern Slavery Policy	This policy sets out our respect for ethical labour practices and values and our zero tolerance approach to any form of modern slavery in our operations and supply chain.
Code of Practice	This code sets out the expected behaviours of our people, including in respect of labour laws and youth or child labour.
Diversity, Inclusion and Equal Employment Opportunity Policy	This policy sets out our commitment to creating and promoting a fair and inclusive workplace promoting diversity, inclusion and equal workforce participation.

Policy	Description
Ethical Employment Policy	This policy sets out our position on ethical employment practices, requiring, as a minimum, to work within employment laws in the countries in which we operate and to demonstrate the highest ethical employment practices.
Health, Safety and Wellbeing Policy	This policy sets out our commitment to the health, safety and wellbeing of our people, customers and the communities in which we serve.
Supplier Code of Practice	This code sets out our expectations of the suppliers we work with, including in respect of labour laws and youth or child labour.
Whistleblower Policy	This policy sets out our commitment to identifying and addressing misconduct, including suspected or actual contraventions of human rights, and encourages the reporting of such conduct safely, securely and without fear of detriment. Throughout the reporting period, an independent hotline was available for the reporting of misconduct with processes in place for the investigation of those reports.
Workplace Behaviours Policy	This policy set out the minimum standard of behaviours expected of employees and contractors.

To further our commitment to addressing modern slavery risks within our supply chain and operations, we are in the process of engaging an external human rights and modern slavery adviser to assist us with our modern slavery program of work for future reporting periods, including:

- undertaking a detailed assessment of our supply chain risks;
- prioritising our actions to address the inherent modern slavery risks identified in our supply chain;
- developing and rolling out a modern slavery training program for our employees;
- identifying gaps in our approach to assessing and addressing modern slavery risks;
- developing a roadmap to address the gaps identified in our modern slavery gap analysis; and
- Partnering with relevant industry associations to share best practices and knowledge.

We will report on the progress of our modern slavery program of work in future reporting periods.

5. Assessment of the Effectiveness of our Actions

We recognise the importance of assessing the effectiveness of our company's modern slavery risk management. Our Boards has ultimate responsibility for overseeing our modern slavery response, with the Strait Link leadership team responsible for the day-to-day management of our modern slavery response, including monitoring our effectiveness.

In the next reporting period Strait Link will take steps to monitor and assess the effectiveness of our modern slavery response as we implement the planned actions outlined below.

6. Consultation and Approval

As outlined in Section 2, our structure is one where the reporting entities share common directors with a leadership team that manages the shipping and logistics business on an integrated group-wide basis. As part of the preparation of this Statement, we have engaged with each of the reporting entities.

This Statement was approved by the following Boards (as the higher entity for the reporting entities within each group within the meaning of the Act):

- The Board of Strait Link Australia Holdings Pty Ltd
- The Board of Strait Link QS Holdings Pty Ltd


DocuSigned by:

ADBBE11DB582401...

Christine Holgate

Director, Strait Link Australia Holdings Pty Ltd

Date: 21/9/2023

DocuSigned by:

71A4CAEDAA7348A...

Jeremy Trouncer

Director, Strait Link QS Holdings Pty Ltd

Date: 21/9/2023