

modern slavery statement

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Introduction

This is DM & MT Nolan Pty Ltd ABN 29 009 767 766 trading as: Nolan's Interstate Transport's first Modern Slavery Statement ("Statement") in accordance with the Australian Modern Slavery Act 2018.

The purpose of this statement is to outline the steps taken by Nolan's to assess modern slavery risks within its operations. Inclusive of supply chain, and to ensure that the Nolan's group has a robust management system and process in place to minimise the risk of human rights abuses and modern slavery in the business operations.

Nolan's Interstate Transport recognises the definition of the Modern Slavery Act 2018 (The Act) as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour mean situations where children are subjected to slavery or similar practices or engages in hazardous work.¹

The Board of Nolan's has a zero-tolerance approach to modern slavery and is fully committed to operating responsibly in all business dealings and relationships acting with the highest ethical integrity and standards and will not tolerate any form of modern slavery or abuse of human rights in the business's operations and supply chain networks.

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The Board of Nolan's has a zero-tolerance approach to modern slavery.

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¹ Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities, Pt1 overview: p8

Structure, Operations and Supply Chains

In pursuit of excellence, with pride and professionalism for over 115 years.

Nolan's Interstate Transport is one of the larger family-owned transport businesses in Australia, priding ourselves on our understanding of customer needs from the small producer to National corporations. Nolan's Interstate Transport is recognised as a leading provider of cold chain solutions. Our logistics team manages the pick-up, warehousing, transport and delivery of freezer, chiller and dry freight.

Servicing the Eastern Seaboard of Australia, Nolan's Interstate Transport have located their Freight Consolidation Hubs in Gatton, Bowen, Brisbane, Sydney, and Melbourne. Established partnerships in Adelaide and North Queensland enable Nolan's to service customers across Queensland, New South Wales, Victoria, South Australia and across to Perth in Western Australia.

Nolan's Interstate Transport understand that our customers need a diversity of logistical solutions. We have invested considerably to provide strategically placed consolidation hubs throughout our network. Located in Sydney, Melbourne, Brisbane and Gatton, our depots provide a secure location for freight consolidation. Managed by experienced transport professionals these hubs are open 7 days per week. With a combined refrigerated storage capacity of over 4200 pallet spaces our cold rooms can store product in accordance with a variety of temperature specifications. In addition to chiller storage, warehousing for dry freight at each freight consolidation hub provides our customers with a complete logistics service option.



Our People

The Nolan's team of people working across all of our depots are the driving force behind our success. Our family business has been built on their passion, drive, and commitment to customer service. We work hard at attracting industry professionals and building strong relationships in the community to identify and nurture future talent. Many of our staff have been with us for most of their working lives, enhancing our strong family identity and values. A commitment to training sees our team reach their goals while supporting our strategic vision.

Fleet

Recognised by the Nolan Green colour, our fleet is made up of a significant number of prime movers and body trucks. Nolan's Interstate Transport's success is in part due to our continued investment in our fleet. We have consistently introduced new technology as part of our commitment to quality service, safety, and the environment. Selection of our fleet and refrigeration units is based upon reliability, fuel efficiency and performance. State of the art prime movers and refrigerated trailers are equipped with GPS monitoring, ensuring we are able to analyse real time data. Equipment is fitted with road friendly air suspension in addition to ABS, EBS and additional safety and communications systems for the benefit of the operator, customer, and other road users. Reliable equipment is one of the many reasons why Nolan's Interstate Transport is a recognised leader in refrigerated transport.

Supply Chain

Nolan's supply chain includes the procurement of goods and services from over 400 active suppliers including subcontractors and over 350 customers directly involved in the transportation of freight.

Business	Operations	Supply Chains
Transport	Local pick-up and delivery Interstate Linehaul Transshipment Ambient freight Chiller freight Frozen freight	Truck dealers new Motor vehicles Trailers and ancillaries Tyres Fuel and Oil Spare parts Vehicle servicing Repairs and Maintenance – truck and trailer dealers Labour hire Subcontractors Tow operators
Cold-room Storage	Fresh Produce storage Dry storage Transshipping and dispatch Racking space rentals Temperature controlled docks	Material handling equipment Racks and racking Cold-room servicing Pallet hire/storage Labour hire Packaging and cartons
Common Administration	IT Services Payroll Human Resources Workshop Compliance Administration Finance Operations and Manifest Property Management	IT software and hardware Stationery and office supplies Uniforms PPE Insurance Workcover Security

100% of Nolan's procurement expenditure was made within Australian shores. Despite this, Nolan's recognises that some of the Australian suppliers are likely to acquire products and some componentry manufactured elsewhere in the world, which could present modern slavery risks deeper than the initial supply chain.

Risks of Modern Slavery – Policies and Procedures

Nolan's Interstate Transport has a well-structured framework of policies and procedures that promote ethical and legal compliance for the logistic and supply chain solutions. Nolan's also acknowledges that modern slavery practices maybe present in its operations and supply chain however, with a strong and long serving board and senior leadership team, a strong cultural foundation has been formed in which corrupt practices and violations of human rights will not be tolerated.

Nolan's integrates human rights into its risk management documents in an effort to combat modern slavery. These include:

- Code of Conduct
- Policy against modern slavery
- Whistle-blowers Protection Policy
- Modern Slavery Risk Assessment
- Grievance policy
- Enterprise agreements and awards
- Recruitment and selection policies and standards
- Supplier and Subcontractor agreement, policies, and systems.

Risk Analysis and Assessment

Each area of the business was requested to conduct a wide-ranging assessment to gauge the potential risks that could arise from their operational and supply chains. A broad format and direction were provided by the compliance team to highlight potential modern slavery practices, with the outcomes of the assessment consolidated and presented to the management team for reviewing.

Majority of Nolan's operations and supply chains were assessed as having a low risk or unlikely to favor opportunities for the abuse of human rights and modern slavery within Australia. Major suppliers are typically large organisations with sound reputations (e.g., motor vehicles, trucks, trailers, fuel and oil, tyres, IT equipment, cold store refrigeration) and Nolan's believe that these organisations will have sound practices within their own framework and have the ability to identify and eliminate modern slavery from within their own supply chain.

One area of risk that was highlighted was dealing with subcontractors and tow operators (agency-based drivers) and how sham contracting and deceptive recruiting for labour may occur. Without having full visibility of the arrangements for subcontractors and vehicle owners there is a presumed higher risk where the supplier can recruit from or outsource to low costs labour and/or countries.

Mitigation

Continuing from the Company's previously lodged statement, Nolan's has identified possible risks of modern slavery by means of the company's risk assessment process and has made alterations to the manual for contractors and sub-contractors outlining the company's stance on Modern Slavery.

Information has also been posted on the Company's web site advising visitors to the site of the Company's stance on Modern Slavery and where the statement may be accessed.

Our Approval Our Future

Nolan's Interstate Transport acknowledges that modern slavery can occur in every industry and sector and has severe consequences to

anyone involved. Nolan's is committed to continuously improving and operating at the highest standards and to address and manage modern slavery risks in its operation and supply chain.

This statement was approved by the board of DM & MT Nolan Pty Ltd in their capacity as principal governing body of DM & MT Nolan Pty Ltd on 01/09/2022.

This statement was signed by Darren Nolan in his role as Director of DM & MT Nolan Pty Ltd on 01/09/2022.

A handwritten signature in black ink, appearing to read 'AN', is placed over a light green rectangular background.

Adrian Nolan
NOLAN'S INTERSTATE TRANSPORT
Director