



Modern Slavery Statement 2023





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Introduction

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

We continue to reaffirm our strong commitment towards and values of, respecting human rights and the eradication of modern slavery. In line with LINX CCG's values, in this fourth submission of our Modern Slavery Statement, our position remains clear and we reject any form of slavery. We have implemented a risk-based due diligence framework to assess where we may cause or contribute to adverse human rights impact to people in our supply chain. We have again broadened the scope of vendors we review within the due diligence process to ensure an ongoing continuous improvement approach.

Our values



This statement has been prepared by LINX Cargo Care Group (**LINX CCG, the Group, we, us or our**) pursuant to the Modern Slavery Act 2018 (Cth) (**Act**) in respect of the risks of modern slavery in our operations and supply chains and the actions we have taken during the financial year ending 31 December 2023 (**FY23**).

This statement covers the activities of LINX CCG including all of our wholly owned and controlled subsidiaries within the Group.

In 2023, 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 previous modern slavery statement, are set out on page 9.

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.

We are committed to conducting our business in an ethical and responsible manner and endeavour to carry out our activities in a way that respects and supports human rights, including but not limited to:

- the prohibition of child and forced labour;
- the elimination of discrimination in employment;
- operating in a manner that supports the goal of zero safety incidents; and
- the eradication of harassment and physical or mental abuse in the workplace.

We strive to embed these standards across all our business units and operations, extending to training, communications, tender activities and contractual agreements.

FY23 key highlights

We continue to enhance our approach to better understand and mitigate the potential for modern slavery risks in our supply chain by working more closely with key suppliers who may have a higher risk or exposure to ensure existing and emerging risks are identified and appropriately addressed.

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.



Continued our annual Tier 1 supplier review – covering 140 key suppliers engaged in 2023.



Engaged with those Tier 1 suppliers to understand their approach and controls in place for managing Modern Slavery supply chain risks through a modern slavery questionnaire.



Implemented a process of direct interviews with key Tier 1 suppliers focussing on their modern slavery supply chain risks, and assessing their Tier 2 supply chain focus. These interviews extended to the Group's New Zealand operations as well.



Continued to incorporate wherever possible contractual obligations in key procurement contracts to address and mitigate against modern slavery.



Continued regular engagement with suppliers on the topic of modern slavery through tender processing, contract negotiations, contract management meetings and vendor onboarding due diligence reviews.



Whilst New Zealand still does not have legislation in relation to modern slavery reporting or due diligence, the C3 Limited and Pedersen Group operations continued to implement governance practices such as the inclusion of modern slavery clauses in contracts, purchase orders and tendering activity. The New Zealand staff also completed modern slavery training.

About LINX Cargo Care Group

LINX CCG is a diversified logistics provider which offered a range of services in 2023 including rail and road haulage, warehousing, stevedoring, forestry related logistics services and finished vehicle processing, storage and transportation. The Group comprises four businesses LINX, Autocare Services, C3, and Pedersen Group.

Our Group brings together the capabilities of four market-leading operations built on more than 100 years of ports and logistics experience. Together LINX, Autocare Services, C3 and Pedersen Group 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 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. In addition, all Australian wholly owned subsidiaries operate under the same modern slavery governance framework, delivered and managed through the corporate structure of LINX CCG.

Whilst only LINX Port Services Pty Ltd and Autocare Services Pty Ltd are 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.

Group Changes within FY23

In the 2023 reporting year, LINX CCG and its shareholders commenced a divestment process covering multiple entities and operational sites within the Group. These included:

- The sale of GeelongPort Pty Ltd in April 2023;
- The sale of LINX Rail Pty Ltd in April 2023; and
- The sale of the LINX business (land and assets) at Forbes NSW in November 2023

With the completion of the sale process for each of these entities and operations, engagement with vendors associated with those sites ended, and subsequently they were removed from the scope of the overall LINX CCG Modern Slavery reporting program.

It is noted at the time of submission of this report that additional business units from within LINX CCG have also been divested. These include:

- The sale of LINX Logistics Pty Ltd in February 2024; and
- The sale of Autocare Services Pty Ltd in April 2024.

As these businesses remained under LINX CCG ownership throughout the 2023 reporting year, they remain in scope for the purposes of this report. However, they will not be included in future Modern Slavery statements submitted by LINX CCG.

¹ The reporting entities in LINX CCG of 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.

Our operations and the risks of modern slavery in our operations

Our operational footprint includes more than 40 corporate and operational sites situated in the majority of Australia and New Zealand's capital cities, plus other regional areas. Despite Australia and New Zealand's lower relevance and vulnerability to modern slavery, the latest Global Slavery Index reports that there are still approximately 41,000 people in situations of slavery in Australia. This statistic reminds us that modern slavery is 'hidden in plain sight' and that no country is immune to slavery.

We have a workforce comprising a diversity of roles, ranging from office-based functions, skilled trades, through to those in our yards performing manual labour. A large part of LINX CCG frontline workforce is unionised with employment terms governed by Enterprise Agreements. During the reporting period, some of these agreements have been renewed and renegotiated. We comply with industrial relations laws and regulations wherever we operate and implement workplace policies to mitigate the risks of modern slavery within our operations.



LINX's combined capabilities across rail² 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 employs stevedores, truck drivers, tradespeople (e.g. mechanics, electricians), machinery operators (e.g. forklift), crane operators, warehouse operators, yards people, administrators, supervisors and managers.



Autocare³ Services is a national service provider in the automotive industry. Autocare operates off-wharf facilities and delivers IT solutions, transport, vehicle processing and storage services for vehicles nationally.

Autocare employs more than 430 people around Australia. Autocare Services employs truck drivers, vehicle processors, planners, tradespeople, fleet builders, yards people, administrators, supervisors and managers.

² LINX Rail Pty Ltd was sold on 30th April 2023, and is no longer part of or owned by LINX Cargo Care Group from that date onwards.

³ Autocare Services Pty Ltd was sold on 30th April 2024, and is no longer part of or owned by LINX Cargo Care Group from that date onwards.



For more than 65 years, C3 Limited (C3) has been New Zealand's largest on-port services provider and has established operations in Australia specialising in forestry-aligned logistics. C3 New Zealand 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.

C3's services include, log marshalling and log stevedoring, as well as general cargo handling, warehousing, container consolidation and transportation. C3 employs more than 1,420 employees across Australia and New Zealand. C3 employs truck drivers, machine operators, tradespeople (e.g. mechanics, fitters), log scalers, log marshallers, stevedores, yards people, administrators, supervisors and managers.

C3 Australia's operations focus on specialist harvesting, hauling, and in-field chipping across an ever-growing network of plantation forests. These services are customisable and capable of delivering from plantation to both domestic and export markets.



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

Our policies and procedures

The following policies and procedures continued to apply during the reporting period:



✓ LINX CCG Anti-Slavery and Human Trafficking Policy

This policy was updated in October 2023. It applies to anyone working on the Group's behalf in any capacity. We have a zero-tolerance approach to all forms of modern slavery within our business and supply chain. A copy of this policy is available at www.linxcc.com.au



✓ 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 Risk 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.



✓ The Whistleblower Policy

The Whistleblower Policy sets out how eligible persons can report certain matters, including illegal conduct such as modern slavery. Under the Policy, employees as well as anyone who supplies goods or services can make a report.

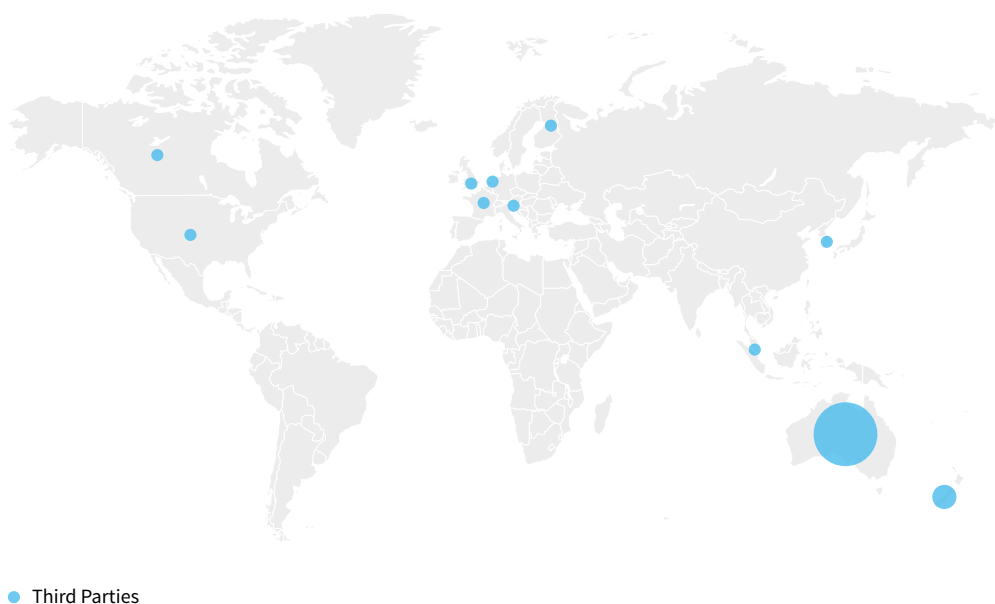
Our supply chain and policy framework

Our procurement categories remain largely the same year on year which means that the description of our supply chain contained in our previous modern slavery statements continues to remain accurate. In recapping the description of our supply chain:

- Our suppliers are predominantly Australian and New Zealand based companies although some of the goods supplied originate from other countries. A small number 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 procurement spend is distributed across approximately 4,400 (as of 2023) 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. These are supply categories in common across the subsidiaries within the Group.

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.

The location of our suppliers based on their modern slavery questionnaire response is represented on the map below:



LINX CCG high risk modern slavery categories

LINX CCG continues to review and refine those categories of goods and services with a higher modern slavery risk.

The overarching LINX CCG procurement strategy covering these higher risk categories has been to focus on engagement of organisations (where possible and aligned to operational requirements) that have established modern slavery programs and reporting practises in place. These include key suppliers who are ASX listed, or are large organisations which can demonstrate an effective approach to managing modern slavery risks.




-  Banking & Corporate Advisory
-  Office supplies and furniture
-  Equipment & Assets: R&M - Tyres
-  Operational Consumables – including dunnage, packaging, and general consumables
-  Freight & Courier
-  Transport Sub-contracting
-  Uniforms, PPE & Safety Equipment
-  Fuel & Lubricants
-  Property - New Site Development & Upgrades and Ongoing Maintenance & Repair Costs
-  Human Resources Expenses (including temporary labour hire)
-  Facilities Management, Cleaning and Janitorial
-  IT Hardware & Network Infrastructure
-  Security Services
-  Marketing, Advertising and Promotional Items
-  Meetings, Conferencing, Travel and Events

Progress on our commitments and actions for 2024

Throughout 2023 LINX CCG continued to use its existing risk-based framework to assess, manage and mitigate modern slavery risks within our supply chain. This combines both internal and external platforms to undertake assessment on all suppliers to determine the appropriate course of action.

We seek to assess the effectiveness of our actions by reference to the goals that we set each year and reporting on our progress against the goals.

	Activity	2023 Action	Status	2024 Goals
	Risk-based assessment conducted for all Tier 1 suppliers	Identify the longer-term suppliers that operate in higher risk sectors and seek to verify their compliance with modern slavery contractual obligations.	Completed for 2023, remains ongoing into 2024	Continue to contract with Tier 1 suppliers, seeking to work with those with values that mirror our own.
	Risk-based assessment conducted for Tier 2 suppliers	Commencement of direct interviews with key Tier 2 suppliers to understand and map their modern slavery mitigation strategies.	Completed for 2023, remains ongoing into 2024	Direct interview program to continue through 2024, with a focus on lower spend but high risk suppliers within the overall supply chain, whom we have found have lower maturity in this area but are often overlooked in due diligence given spend. Implementation of the actions identified through the Tier 2 Supply Chain Analysis.

Activity	2023 Action	Status	2024 Goals	
	<p>Enhancement of overall Modern Slavery risk assessment framework</p>	<p>Seek external advice from subject matter experts as to whether our risk assessment framework requires revision.</p>	<p>Completed</p>	<p>Undertake a review of the overall Modern Slavery risk categories and the LINX CCG matrix aligned to them for the remaining business units within the Group.</p> <p>This includes a continued focus on how data collected through the questionnaire is reviewed and acted upon.</p>
	<p>Addition of modern slavery clauses into new supply agreements</p>	<p>Identify suppliers coming up for renewal and ascertain their compliance with the modern slavery terms prior to renewing contracts.</p>	<p>Completed for 2023, remains ongoing into 2024</p>	<p>Continue to identify suppliers coming up for renewal and ascertain the adequacy of their anti-slavery framework prior to recontracting.</p>
	<p>Annual Modern Slavery Training program for employees</p>	<p>Annual modern slavery training program to include specific procurement related training with a focus on modern slavery for key staff in both our Australian and New Zealand operations with the aim of further broadening the overall knowledge base and modern slavery awareness.</p>	<p>Ongoing through 2024</p>	<p>Annual modern slavery training program to continue, with specific procurement related training to be undertaken as required by the remaining business units, and aligned to divestment requirements.</p>

Tier 2 supply chain Analysis

For 2023 LINX CCG commenced a process of direct interviews with key suppliers to further understand their supply chain and in particular, their ongoing approach to modern slavery compliance.

These direct interviews covered the following key categories across the Australian operations:



Labour Hire (also undertaken in the New Zealand operations as well)



Security



Stationery and Office Supplies



Waste Removal



Tyre Supply



Asset Leasing Services



Vehicle Transport (Ocean Freight)

Outcomes Identified:

These interviews focussed on understanding suppliers' overall supply chain and the inherent risks within those, and in particular their approach to minimising or eradicating these risks. Some of the key consolidated responses from these interviews are detailed below:

Question	Key Interview Response Examples
Does your organisation already have a modern slavery management process in place to address gaps?	<ul style="list-style-type: none">• Responses confirmed that, of the interviewed suppliers, most had processes in place such as using Third Party Risk consultants, Audit Consultants, and a Modern Slavery Management Committee to address any possible gaps.
Who has ultimate responsibility for modern slavery management and outcomes?	<ul style="list-style-type: none">• The standard response included: The compliance team, The Board and Modern Slavery Steering Committee are ultimately responsible for Modern Slavery Management and outcomes.
What are the main modern slavery risks to your business? (Please identify potential types of modern slavery hotspots in operations and supply chains and available tools.)	<ul style="list-style-type: none">• Some of the highlighted risks included: Geographical, industrial and category risks within the supply chain.• Other responses included: Sub-contractors, Suppliers of solar PVs, facilities management including cleaning and security services, waste management and PPE.• Several interviewees confirmed that to minimise or overcome these challenges, they have: Supplier Code of Practices, External risk audits and ability to perform physical audits as and when required to engage any supplier.
How many suppliers and tiers of suppliers will the organisation directly check for modern slavery?	<ul style="list-style-type: none">• Most suppliers have identified and mapped their major Tier 1 suppliers and are continuing to map their overall Tier 2 supply chains for key products and services.• Many further identified that they plan to review the broader supply chain for specific suppliers and have been checking Tier 2 suppliers based on specific categories.• Additionally, one organisation has commenced a Tier 3 review commencing into 2023/2024.• Several organisations have implemented measures to ensure ethical and transparent sourcing practices with their suppliers.

Question

What process is in place for assisting discovered victims of modern slavery in suppliers?

Key Interview Response Examples

- Several suppliers implemented processes to address incidences of modern slavery, along with Whistleblower Hotlines for reporting incidents including modern slavery.
- Some organisations implemented a six-step modern slavery risk assessment process, including reporting risks internally, evaluating and investigating potential issues, and taking action to mitigate or remediate the risk, along with suppliers conducting investigations of identified modern slavery risks, and reports its findings to the Working Group and the Board, which will make recommendations for further action on a case-by-case basis.
- Other responses included working collaboratively with the person(s) involved to address and remediate any existing instances of modern slavery and mitigate any future instances. If the supplier is not satisfied with the response from the person(s), it may take necessary actions, including removing the person(s) from its supply chain and/or operations and terminating the engagement.
- Others referenced the ability to raise concerns via their website or sales team, while internal employees can lodge concerns via the intranet portal. Organisations' employees are trained on where to address concerns as part of internal training programs.

LINX CCG proposed actions to be addressed through 2024 in light of the information obtained from these interviews:

- Develop a detailed remediation strategy that addresses the principles of human rights when a suspected modern slavery breach is identified in the supply chains of our operations.
- Review the Modern Slavery Statements of our high-risk suppliers who are required to submit statements and engage with them on their commitments and ongoing progress. And in particular their progress on the Tier 2 and Tier 3 supply chain.
- Pilot enhancements to responsible supply terms and conditions in agreements with high-risk suppliers engaged by our operations to bolster the way we address modern slavery risk in this area.
- Continue to work with various stakeholders across the community, to provide services and points of view on the issue of modern slavery.



Employee tools for reporting 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 the business or our 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 managed by an independent third party and available for LINX CCG employees, vendors and any other interested parties to 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.

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 and to the best of our knowledge we did not receive any reports of actual or suspected violations of our Human Rights Policy during the reporting period.

Effectiveness assessment

We continue to focus on evolving our approach to modern slavery to ensure that we are able to assess and address modern slavery risks within our operations and supply chains. As noted earlier in this statement, we seek to assess the effectiveness of our actions by tracking against the goals that we set each year to increase visibility in relation to our supply chain and test the robustness of our frameworks.

Additional ways that we continue to assess the effectiveness of our approach include:

- Ongoing engagement with key higher risk suppliers regarding compliance with our policies and processes.
- Ongoing reviews of our overall modern slavery program and controls, to address any new or emerging trends within the overall modern slavery risk framework
- Ongoing engagement with internal stakeholders and departments including legal, insurance and risk, procurement, and the Senior Leadership Team.
- Engagement and review of our progress on a regular basis through meetings of the LINX CCG Modern Slavery Committee.
- Interviews with key high risk suppliers in our Australian and New Zealand operations to further understand the risk and ongoing mitigation measures undertaken by these suppliers, to manage adverse human rights risks in their supply chain.
- Continued training of our employees to increase awareness of modern slavery red flags.

Our approach to 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

The preparation of this statement involved the engagement and input of the different teams within LINX Cargo Care Group from Legal, Procurement, Finance and Risk. These members of these teams are responsible for the reporting entities and each of their owned or controlled entities and as they are part of the Group Corporate Centre who have functional and governance oversight for each of these entities. This process constituted consultation of each of these entities. This statement was also presented to the Group Senior Leadership team.

This Modern Slavery Statement has been approved by the LINX CCG Chief Executive Officer and the Board of BAPSH in its capacity as the holding company of the reporting entities within LINX CCG.

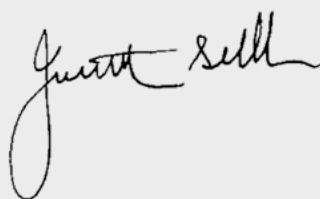
Brett Grehan

LINX Cargo Care Group CEO



Jonathon Sellar

Chairman – BAPSH Pty Ltd





Modern Slavery Act 2018 (Cth)

Reporting criteria

Reporting Criterion	Page/s
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	3, 5-8
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	7-8, 10-11
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	10-11, 14-17
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	19
6. Describe the process of consultation with any entities the reporting entity owns or controls	20