



## **FY24 Modern Slavery Statement**

## 1. About this statement

This Modern Slavery Statement (“Statement”) is a joint statement for the reporting period ended 31 March 2024 for the following two reporting groups and their respective reporting entities:

### Strait Link Australia Holdings Group

- Strait Link Australia Holdings Pty Ltd (ACN 649 025 963);
- 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 Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the “Act”) and outlines the actions taken by Strait Link to identify and address modern slavery risks across our supply chain and operations. It also outlines our plans for the next reporting period. This Statement has not been externally assured. This Statement has been reviewed for legal compliance. This Statement was approved by the respective Board of Directors for Strait Link Australia Holdings Pty Ltd and Strait Link QS Holdings Pty Ltd and has been signed by a director for each reporting group on 12 September 2024.

## 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 March 2024, our total direct workforce in Australia was 497 employees, and of that 90% were male and 10% female with 100% of the workforce based in Australia.

### *Our supply chain*

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

During the reporting period, Strait Link procured approximately \$270 million of goods and services from approximately 230 direct suppliers, including circa 30 subcontractors. Approximately 99% of our total spend in the year was with direct suppliers located in Australia. In 2024, Strait Link will send its two vessels to dry dock in Singapore which will result in an increased spend with suppliers from overseas in the FY25 reporting period.

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 2024 is made in accordance with the Act and therefore focuses on operational and supply chain risks.

#### **Supply Chain Risks**

In line with the UN Guiding Principles on Business and Human Rights (“UNGPs”) and the Australian Government’s guidance for compliance with the Act, Strait Link took the opportunity to understand and manage our modern slavery risks through the full extent of its supply chains more deeply.

Following the previous reporting period and with the support of an external human rights and modern slavery adviser, we completed a hotspot analysis of inherent modern slavery risks in the supply chain of our reporting entities.

#### **Modern Slavery Hotspot Analysis**

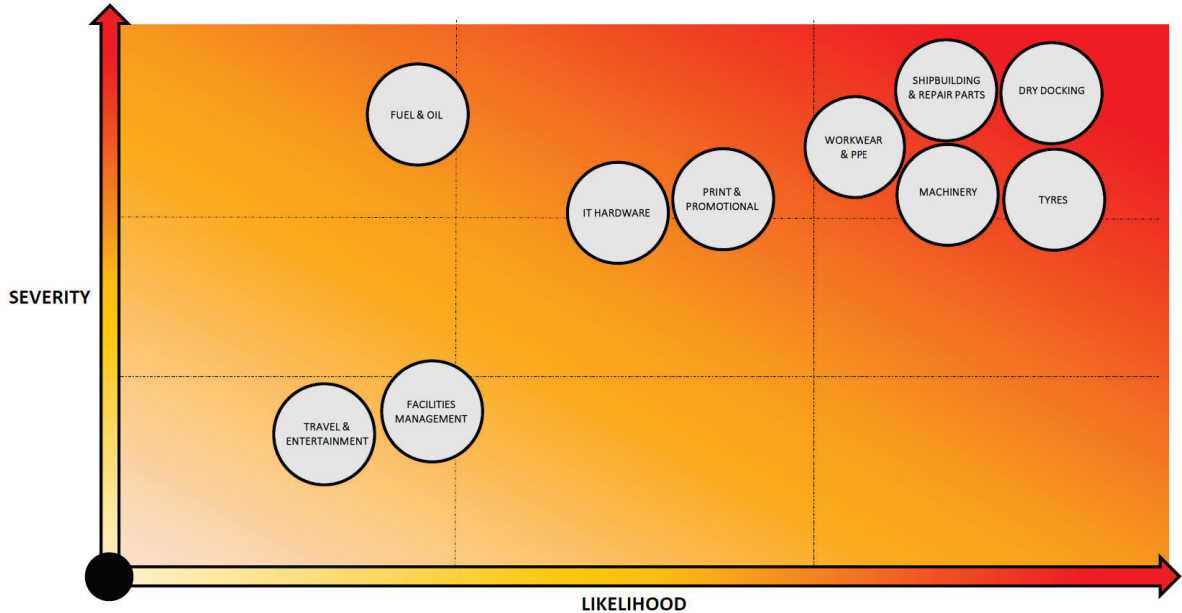
Under this assessment, we reviewed our procurement data including key suppliers and spending information.

We identified the categories of suppliers perceived to have a heightened modern slavery risk and compared these categories against key external sources (including government, non-government organizations, and media reporting) to identify modern slavery hotspots in Strait Link’s supply chain.

The risk assessment focused on risks to people rather than the risks to Strait Link, which is consistent to the UNGPs concept of severity. The ratings used for severity considered scale (impact on the person’s human rights), scope (how many people

would be affected) and irremediability (could the person’s rights be restored regardless whether compensation was paid).

Likelihood was based on our assessment of how likely modern slavery would be to occur in each hotspot, excluding any current or future controls implemented by Strait Link or its suppliers. We also considered each hotspot using UNGPs continuum of involvement.



Our hotspot analysis identified the following supplier categories with indicative inherent modern slavery risks in Strait Link’s supply chain:

- print and promotional materials
- fuel and oil
- workwear and personal protective equipment (PPE)
- travel and entertainment
- IT support services and hardware
- tyres
- facilities management
- machinery
- shipbuilding and repair parts
- dry docking

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.

<b>Policy</b>	<b>Description</b>
Fraud, Anti-bribery and Corruption Policy	This policy sets out our zero tolerance of fraud, 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 fraud, 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.
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.

Policy	Description
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 sets out the minimum standard of behaviours expected of employees and contractors.

Strait Link is committed to addressing modern slavery risks within our supply chain and operations. In the reporting year we have:

- undertaken a modern slavery hotspot analysis;
- increased the awareness of modern slavery and human rights in Strait Link;
- worked on addressing identified gaps in our internal policies and procedures; and
- reviewed supplier contracts involved in Strait Link’s dry dock program.

## 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 have 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.

Strait Link is taking steps to monitor and assess the effectiveness of our modern slavery response as we implement the planned actions outlined.

We are committed to maintaining effective systems to identify, assess, respond to and proactively manage modern slavery risks in accordance with relevant legislation, international human rights standards, regulatory obligations, shareholder expectations and good corporate governance principles.

The Strait Link Whistleblower Hotline, which is available 24/7, also offers a protected channel to employees who may use it to report compliance violation.

Identifying and managing non-compliance issues are essential to supporting our implementation of certain corporate governance principles and standards, including the specific provisions in the fight against human rights violations, modern slavery, corruption, and criminal law.

## 6. Future Program of Work

We are committed to strengthening our modern slavery risk management framework, focusing on such areas as:

- identifying and implementing a system to assess supply chain modern slavery risk (including existing supplier base);
- prioritising our actions to address the inherent modern slavery risks identified in our supply chain;
- developing and rolling out a modern slavery capacity-building program for our employees; and
- partnering with relevant industry associations to share best practices and knowledge.

In particular, we have identified three core pillars to drive our commitment to a Responsible Supply Chain: Governance, Social Responsibility and Environmental Sustainability. Underpinning these pillars are our commitments to the UN Human Rights Charter and Modern Slavery Act, our carbon footprint minimization commitment and our overarching corporate social responsibilities.

## 7. 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):

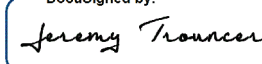
- The Board of Strait Link Australia Holdings Pty Ltd
- The Board of Strait Link QS Holdings Pty Ltd



**Christine Holgate**

Director, Strait Link Australia Holdings Pty Ltd

Date: 19/09/2024

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**Jeremy Trouncer**

Director, Strait Link QS Holdings Pty Ltd

Date: 19/9/2024