



Modern Slavery Statement 2024



Contents

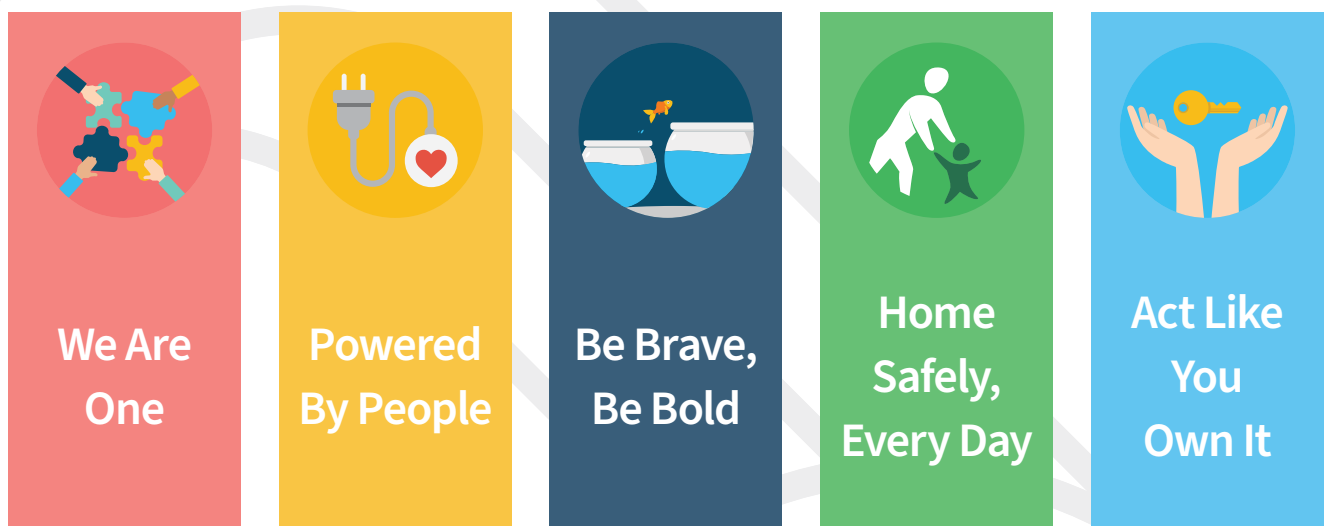
Introduction	3
Our values	3
FY24 key highlights	5
About LINX Cargo Care Group	6
Our vision and mission	6
Reporting entity structure	7
Group changes within FY24	7
Our operations and the risks of modern slavery in our operations	7
Our supply chain	9
LINX CCG high risk modern slavery categories	10
Our policies and procedures	11
Progress on our key commitments and actions for 2025	12
Case Study – Barge Manufacturing Singapore	14
Tier 2 Supply Chain Analysis	15
Employee tools for reporting modern slavery concerns	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.

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 fifth submission of our Modern Slavery Statement, our position remains clear, that we reject any form of slavery. We have implemented a risk-based due diligence framework to assess where we may cause, contribute or be linked to adverse human rights impact to people in our operations and 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



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.

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 2024 (FY24).

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

In 2024, 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.

FY24 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 53 key suppliers engaged in 2024.



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.



While the future of modern slavery legislation in New Zealand remains uncertain, 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 2024 including warehousing, stevedoring and forestry related logistics services including road haulage. The Group comprises three businesses LINX, C3, and Pedersen Group.

Our Group brings together the capabilities of three market-leading operations built on decades of ports and logistics experience. Together LINX, C3 and Pedersen Group employ more than 2,200 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 on behalf of itself and LINX Port Services Pty Ltd, the only other entity within LINX CCG that met the threshold under the Act¹. As a holding company, BAPSH does not manage supply chains or procure any goods or services. LINX Port Services Pty Ltd does not own or control any other entity.

BAPSH and its owned or controlled entities (including LINX Port Services Pty Ltd) have the same company secretary and there are some common directorships. This statement has been reviewed and approved by the directors of each entity within the LINX CCG corporate structure. 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 LINX Port Services Pty Ltd is the only operating entity for which this statement is required in accordance with the Act, this statement sets out how LINX CCG manages modern slavery risks across the whole of the Group.

Group changes within FY24

In the 2024 reporting year, LINX CCG and its shareholders continued a divestment process covering multiple entities and operational sites within the Group. These included the sale of:

- LINX Logistics Pty Ltd and LINX Portlink Pty Ltd in February 2024²; and
- Autocare Services Pty Ltd in April 2024³.

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.

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 prevalence and vulnerability to modern slavery, the 2023 Global Slavery Index reports that there are still approximately 41,000 people subjected to modern slavery in Australia. This statistic reminds us that modern slavery is 'hidden in plain sight' and that no country is immune to slavery.

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1. The only reporting entity within LINX CCG is LINX Port Services Pty Ltd. BAPSH Pty Ltd is a holding company. The BAPSH Directors are not involved in the day-to-day operations of the businesses within LINXCCG.
 2. LINX Logistics Pty Ltd and LINX Portlink Pty Ltd were sold to Medlog Oceania Pty Ltd on 29 February 2024 and were no longer part of or owned by LINX Cargo Care Group from that date onwards.
 3. Autocare Services Pty Ltd was sold to Optimus Group Australia Pty Ltd on 30 April 2024 and is no longer part of or owned by LINX Cargo Care Group from that date onwards.
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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, many 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 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, tradespeople (e.g. mechanics, electricians), machinery operators (e.g. forklift), crane operators, warehouse operators, yards people, administrators, supervisors and managers.



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 1,200 employees across Australia and New Zealand. C3 employs truck drivers, machine operators, tradespeople (e.g. mechanics, fitters), log scalars, 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, sawmill and forestry companies in New Zealand and Australia. Pederson employs more than 110 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 scalars, administrators, co-ordinators, supervisors and managers.

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 4,000 (as of 2024) 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:



















● Third Parties

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 robust 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.

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

Our policies and procedures

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



✓ LINX CCG Anti-Slavery and Human Rights Policy

Our updated *Anti-Slavery and Human Rights Policy* was published in October 2024. This policy applies to anyone working on the Group's behalf in any capacity including employees, agency workers, contractors, and suppliers. 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/documentation/.



✓ The Whistleblower Policy

Our updated Whistleblower Policy was published in October 2024. It 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. The confidential reporting hotline is managed by Navex Global and the website is www.brookfield.ethicspoint.com and the phone number is 1800 152 863. A copy of this policy is available at <https://linxcc.com.au/documentation/>.



✓ 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. It applies to all officers and employees who must obtain an annual certification of compliance with the Code.



✓ 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 with a procurement function.



✓ 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.

Progress on our key commitments and actions for 2025

Throughout 2024 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.

Action	2024 Action	Status	2025 Goals
Risk-based assessment conducted for key Tier 1 suppliers	Continue to contract with Tier 1 suppliers, seeking to work with those with values that mirror our own.	Completed for 2024, remains ongoing into 2025	Conduct a review of contracts with key tier 1 suppliers to assess compliance with modern slavery terms and obligations, with a focus on engagement with those presenting the least robust compliance programs.
Risk-based assessment conducted for Tier 2 suppliers	Direct interview program to continue through 2024, with a focus on lower spend but high risk Tier 1 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.	Completed for 2024, remains ongoing into 2025	Direct interview program to continue through 2025, with a focus on lower spend but high risk Tier 1 suppliers within the overall supply chain. Develop and implement actions identified through following discussions with Tier 1 suppliers.

Action	2024 Action	Status	2025 Goals
Enhancement of overall Modern Slavery risk assessment framework	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. This includes a continued focus on how data collected through the questionnaire is reviewed and acted upon.	Completed for 2024, remains ongoing into 2025	<p>Continued focus will be on how we use the data collected and act upon it.</p> <p>Key Focus on New Zealand operations and continuing to undertake Tier 1 and Tier 2 supplier engagement.</p>
Addition of modern slavery clauses into new supply agreements	Continue to identify suppliers coming up for renewal and ascertain the adequacy of their antislavery framework prior to recontracting.	Completed for 2024, remains ongoing into 2025	Review modern slavery clauses and integrate revised clauses into contracts coming up for renewal.

Case Study – Barge Manufacturing Singapore

In early 2024 LINX was required to undertake a procurement process for the manufacturing of a barge to support the operations of the Port of Cocos Island in the Indian Ocean Territories.

Working with key stakeholders, a local shipbuilding agent was engaged to manage the build which would be undertaken through a Singapore shipyard.

Given the additional modern slavery risks presented by this offshore engagement, LINX undertook additional processes to manage this risk, including:

- Review of the shipyards policies and procedures around both health and safety but also employment and aspects relating to their overall modern slavery governance approach.
- Onsite visits to the shipyard to view the progress of the build and to also undertake first hand inspections of the overall shipyard and working conditions.
- Inclusion of a modern slavery clause in the agreement for the construction of the barge.



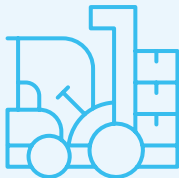
Tier 2 Supply Chain Analysis

For 2024 LINX CCG continued a process of direct interviews with key Tier 1 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:



Repair & Maintenance
Contractors



Equipment Hire



Information
Technology



Cleaning (also
undertaken across
New Zealand
operations)

Outcomes Identified:

These interviews focussed on understanding our Tier 1 suppliers’ supply chain and the inherent risks within those, and in particular their approach to minimising the risks. Some of the key consolidated responses from these interviews are summarised 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">The answers provided confirmed that the majority of suppliers interviewed have modern slavery management processes in place including, but not limited to, modern slavery working groups, third-party modern slavery risk consultants and self-assessment questionnaires to identify and rectify any gaps in their approach to modern slavery risk management.
Who has ultimate responsibility for modern slavery management and outcomes?	<ul style="list-style-type: none">Responses ranged from the Managing Director, Chief Executive Officer, the Senior Leadership Group and/or the Board as having ultimate responsibility for modern slavery management and outcomes.

Question	Key Interview Response Examples
<p>What are the main modern slavery risks to your business?</p> <p>(Please identify potential types of modern slavery hotspots in operations and supply chains and available tools.)</p>	<ul style="list-style-type: none"> • Key risks identified were the use of off-shore subcontractors where risk of exploitation was reduced by ensuring staff are employed directly by the business and pursuant to local labour hire laws. • Other risks identified including the purchasing of paper pulps used in consumables such as hand towels and toilet paper with risks mitigated by working with larger key suppliers who monitor their own supply chains and ensure suppliers are subject to their Supplier Code of Conduct.
<p>How many suppliers and tiers of suppliers will the organisation directly check for modern slavery?</p>	<ul style="list-style-type: none"> • Majority of respondents advised that they had or intend to implement governance frameworks and supply chain due diligence using software and technology platforms.
<p>What process is in place for assisting discovered victims of modern slavery in suppliers?</p>	<ul style="list-style-type: none"> • The majority of respondents detailed their business controls including policies and the reporting procedures to be followed, including reporting hotline details, employee training, seeking guidance from senior management or human resources to assist a victim of modern slavery. • Other respondents advised on their internal grievance policy with one providing an example relating to wage theft where the grievance policy addresses the consideration of repayments to workers.

Information obtained from these interviews will be incorporated into the 2025 modern slavery reporting procedures:

- Develop a remediation strategy aligned with the United Nations Guiding Principles on Business and Human Rights to inform our approach when we are found to have caused or contributed to modern slavery.
- Review the modern slavery statements of our high-risk suppliers (where statements are published) and engage with them on their commitments and ongoing progress. Consider the descriptions of risks and actions taken by our suppliers in relation to their own suppliers (eg our Tier 2 supply chain).
- Pilot enhancements to responsible supply terms and conditions in agreements with high-risk suppliers.
- Continue to engage with stakeholders on the topic of modern slavery to raise awareness and seek opportunities for the LINKX to make a positive impact in the efforts to mitigate 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 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 Anti-Slavery and 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.
- 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 modern slavery risks in their supply chain.
- 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 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 modern slavery risks through our activities and supplier and business relationships.

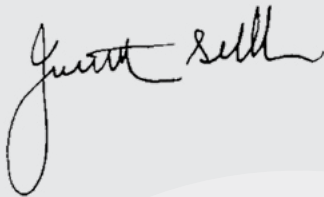
How this statement was prepared

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 who have functional and governance oversight for the entities within the Group, including the reporting 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 Board of BAPSH Pty Ltd in its capacity as the parent company of the reporting entities within LINX CCG.

Jonathon Sellar

Chairman – BAPSH Pty Ltd



Ray Neill

Director – BAPSH Pty Ltd



