



**2024 Sadleirs
Modern Slavery Statement**

Our Structure, Operations and Supply Chains

Sadleirs* consists of the following businesses:



Road and rail services throughout Australia

International freight forwarding and customs brokerage

Specialist linehaul services to the resources sector

Custom packaging solutions and industrial supplies

Sadleirs is headquartered in Perth, Western Australia, with operations in Sydney, Melbourne, Brisbane, Adelaide, Karratha and New Zealand.

Whilst we only operate in Australia and New Zealand, we source goods and services from a wide variety of suppliers, both in Australia and overseas, to support our Sadleirs operations.

As an indication, procured goods range from prime movers, diesel fuel and vehicle/trailer parts, to packaging and industrial supplies, IT software/

hardware, uniforms, and office supplies.

Outside of Australia, our extended supply chains are primarily located in Asia and, to a lesser extent, Europe.

We intend to progressively develop a supply chain map to assist in our continuing assessment of modern slavery, human rights, and other procurement risks.



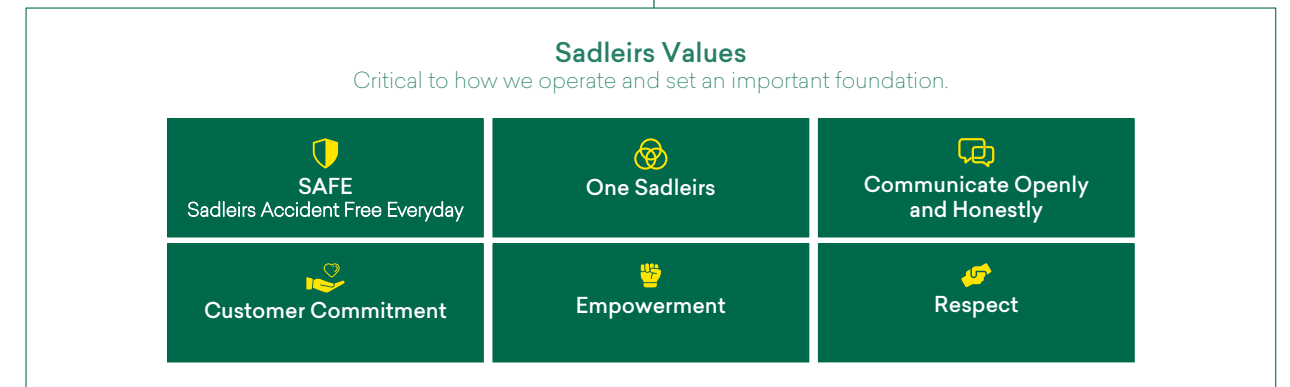
Group People and Equipment

350+ Employees **450+** Intermodal Equipment **500+** Trucks and Trailers **100+** Rolling Stock

Our Governance

Sadleirs has a well developed corporate governance framework, to address risk and compliance issues, including modern slavery and human rights.

The framework includes the following:



Sadleirs' Code of Conduct expressly states that Sadleirs is against all forms of slavery and human trafficking, forced and bonded or child labour. Sadleirs will not tolerate any forms of slavery or human rights abuse in any parts of its business including by any of its service providers or in its supply chain.

An express obligation also requires all employees

and service providers to immediately report to management if they know or suspect any form of slavery or human rights abuses.

Sadleirs has a formal Anti-bribery and Corruption Policy which prohibits the taking of any bribes, kickbacks, or other inappropriate payments.

These types of payments may also be associated with human rights abuse.

*R.C. Sadleir Pty Limited (ABN 65 008 667 052) and its related bodies corporate. The reporting entity is R.C. Sadleir Pty Limited, as the parent company in the Lionel Samson Sadleirs Group. Unless expressly stated otherwise, this Statement applies to R.C. Sadleir Pty Limited and its subsidiaries as a whole. During the reporting period, we engaged and consulted with all our operating subsidiaries in the development of this statement and in the assessment of all relevant risks and implementation of associated controls.

Assessment and Mitigation of Modern Slavery Risk

Sadleirs enterprise risk management framework provides a key mechanism for the analysis, assessment and management of modern slavery and human rights risks.

We will continue to use this framework to identify risk factors relevant to Sadleirs, including the higher risk supply chains; industry, workforce, and geographic indicators; the effectiveness of existing controls; and, importantly,

potential additional controls we can implement to reduce the relevant risks.

The continued disruption of the global supply chain, brings with it increased risks. We remain alert to these risks and continue to work with our suppliers to maintain continuity of appropriate supply relationships and regular communication.

Due Diligence and Assurance

Sadleirs recognises that additional due diligence during supplier and subcontractor onboarding, and as part of a formal ongoing assurance programme, assists in the identification of risk. Where appropriate this may require follow up monitoring and management, in accordance with our risk management processes.

We have implemented a standardised and risk-based assessment process for new and existing suppliers and our subcontractors.

We have been working with our key customers to monitor modern slavery risk in our supply chains.

We conduct an annual employee engagement survey, seeking our employees view on several matters, including our corporate responsibility and ethics. Any issues identified are subject to review and rectification.

In addition to the Whistleblower Policy, we also maintain internal grievance and dispute resolution procedures which enable our people to raise and escalate any concerns they may have, including to our Human Resources department or the Executive Management team.

Measuring Effectiveness

Assessing the effectiveness of actions in reducing modern slavery and human rights risks can be challenging. Both incident reporting and risk management review reporting occurs within the structure of our broader governance framework and, as appropriate, such matters

are escalated accordingly. Key performance indicators involve our assessment of control effectiveness and our ongoing progress in the implementation of additional controls, as identified in our risk management reviews.

Training and Capability Building

Our Sadleirs Family Values and core policies are communicated to our people on induction and on a regular basis.

With regards to our specific processes and controls to mitigate modern slavery and human rights risks, specialist support is provided to Sadleirs by our Human Resources and Legal departments.

We recognise the need to further build the awareness and

capability of all our employees, to continuously strengthen our response to the relevant risks and regularly review our areas of focus.

We continue to develop and deliver appropriate training and develop capability.

As industry awareness improves, we also look forward to working with similar organisations and customers, to collaborate in the objective of ending modern slavery.

Looking Forward

We will pursue continuous improvement in our efforts to reduce the risk of modern slavery, and any other infringement of human rights, in our business and the sectors in which we operate.



We will focus on:

- 1 Due diligence**
Continuing to evaluate and implement measures to further reduce modern slavery risks within our operations.
- 2 Capability building**
Developing additional training for relevant managers and staff in the identification, management and reporting of modern slavery risks.
- 3 Systems and processes**
Implementing enhanced enterprise risk management and governance, including training systems and ongoing review and updates to policies and procedures.
- 4 Customer, supplier and subcontractor engagement**
Continuing to work with our valued customers, suppliers and subcontractors to jointly reduce the risk of modern slavery and any other infringement of human rights.
- 5 Evaluating our progress**
Regularly review the effectiveness and progress of our efforts.

This Statement was approved by the Board of the R.C. Sadleir Pty Limited.


David Cole
Chief Executive Officer

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