



**AWH PTY LTD
(ACN 069 066 842)**

MODERN SLAVERY STATEMENT FY24-25



MODERN SLAVERY ACT REPORTING CRITERIA

Identifying the reporting entity	Page 3
Describe the reporting entity's structure, operations and supply chains	Page 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 5
Describe to actions taken by the reporting entity and entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Page 7
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1. INTRODUCTION

At AWH Pty Ltd (ACN 069 066 842) (**AWH**) we are committed to upholding human rights across our entire business. Our people are integral to our operations and ongoing success, which is why we remain committed to preventing modern slavery and ensuring that people connected to our supply chain are treated with dignity and respect.

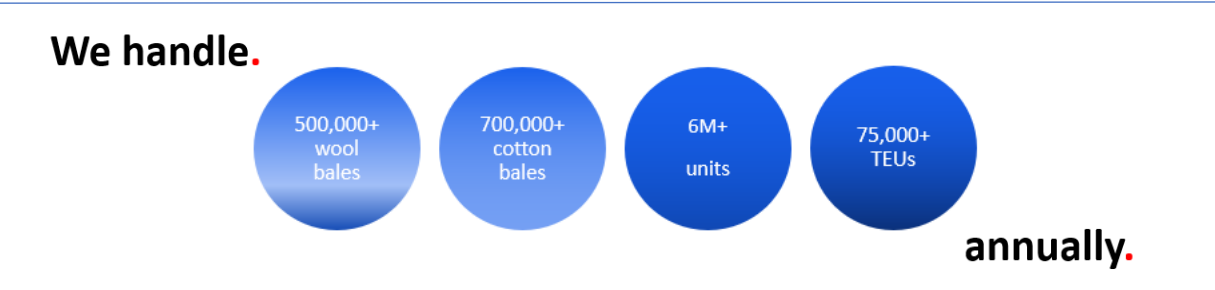
This Modern Slavery Statement is provided by AWH in accordance with the *Modern Slavery Act 2018* (Cth) (**Statement**). This is our fifth statement made in fulfilment of the requirements of the *Modern Slavery Act 2018* (Cth) and applies to the financial year 1 July 2024 to 30 June 2025 (**Reporting Period**). This Statement outlines AWH’s process for identifying potential modern slavery risks, and our approach to mitigating such risks. Our focus during the Reporting Period has been to maintain our zero-tolerance approach to modern slavery and educate our employees at all levels regarding the risks of modern slavery.

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Our Operations

Established in 1998, AWH is Australia’s largest wool and independent cotton handler and is one of Australia’s leading general warehousing and logistics providers. The products handled by AWH come in all shapes and sizes, from a bale of wool or cotton, to a pallet of cement or package of insulation, through to industrial escalators and elevators, dangerous goods and dry bulk commodities.

AWH occupies over 695,000 square meters of warehousing space and 180,000 square meters of hardstand across 16 locations across Australia. We employ over 330 people who handle close to 500,000 bales of wool, 700,000 bales of cotton, 6,000,000 units and 75,000 twenty-foot equivalent units per year.



AWH also provides auction sale room services for the three national wool selling centers and is licensed to handle and store dangerous goods in Victoria, Queensland, South Australia and Western Australia.

Our Commitments.

We build connections

We are forward looking

We make it happen

We care



Our Locations

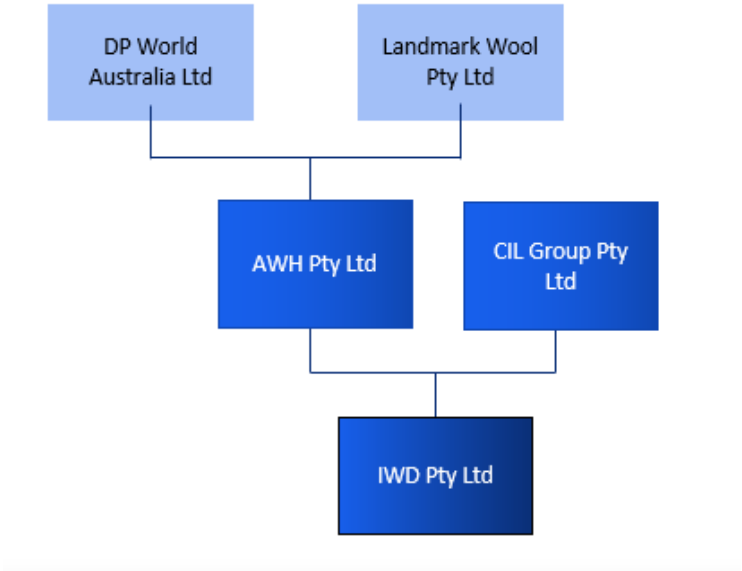
AWH operates from 15 locations across six states. Our registered office is located at 250 Forest Road South, Lara, Victoria.

Major Centre Sites	Regional Sites
Lara, Victoria (Head Office)	Bathurst, NSW
Laverton North, Victoria	Goulburn, NSW
Brooklyn, Victoria	Wagga Wagga, NSW
Yennora, NSW	Tamworth, NSW
Rocklea, Queensland	Dubbo, NSW
Gillman, South Australia	Yarrawonga, Victoria
Bibra Lake, Western Australia	Hamilton, Victoria
Launceston, Tasmania	

Our Structure

AWH is an Australian proprietary company limited by shares. AWH has two 50% shareholders - DP World Australia Ltd (ACN 129 842 093) and Landmark Wool Pty Ltd (ACN 076 744 619). Each shareholder has three directors appointed to the AWH Board who were consulted in the development of this statement.

AWH holds a 50% shareholding in IWD Pty Ltd (ACN 064 681 572), a wool dumping business operating in Western Australia. IWD Pty Ltd is an Australia proprietary company limited by shares. CIL Group Pty Ltd (ACN 008 690 293) holds the remaining 50% shareholding in IWD Pty Ltd. Each of IWD Pty Ltd’s shareholders has two directors appointed to the IWD Board who were consulted in the development of this statement.





Our Supply Chain

AWH's supply chain encompasses a wide array of customers and suppliers, which can be apportioned into two primary categories:

1. **Customer Products:** AWH's customers requiring storage and handling services across our key markets of wool, cotton, dry bulk, industrial, agri-chemicals and renewables. The products handled by AWH are intended for B2B fulfillment, including exporters and wholesale suppliers and manufacturers. Our customers generally operate in Australia, with some importing products into Australia. AWH's services are provided across our national footprint.
2. **Non-trade Procurement:** AWH's procurement of goods and services from external third parties to support AWH's operations. In the Reporting Period AWH utilised suppliers for the supply of the goods and services, including office equipment and consumables, PPE / uniforms, IT hardware and software, transport services, facilities management, facilities, professional services, utilities, plant and equipment and labour hire.

3. RISKS OF MODERN SLAVERY

At AWH we acknowledge that modern slavery can occur in any industry and sector and the warehousing and logistics sector is not immune to causing, being linked to, or contributing to modern slavery. In support of our commitment to preventing modern slavery and our zero-tolerance approach, AWH has adopted a proactive approach to managing risk across our operations and supply chain which is underpinned by the United Nations Guiding Principles. Key risks of modern slavery identified by AWH include:

- Location and nature of services
- Direct labour
- Indirect labour
- Facilities management
- Procurement of goods

Location and Nature of Services

AWH's operations are based in Australia, with warehouses located in Victoria, New South Wales, Queensland, South Australia, Tasmania and Western Australia. Our business model does not involve manufacturing or production of physical products.

Direct Labour

Our employee workforce is employed in Australia, and we handle most of our recruitment in-house. Where recruitment agencies are used, we ensure they are reputable and require them to complete our Modern Slavery Questionnaire before their services are used. Our process of onboarding new employees is extremely rigorous. Our warehouse employees and office staff, save for employees who earn over the High-Income-Threshold, are covered by collective agreements. These protections ensure that all our employees receive no less than the minimum entitlements under the National Employment Standards. AWH also ensures ongoing compliance with Australia labour laws and regulations.

Indirect Labour

AWH acknowledges that the use of indirect labour may carry inherently higher modern slavery risks, particularly in instances where third party labour consists of higher numbers of low-skilled



and/or migrant workers and the services offer low profit margins. AWH engages indirect labour via labour hire firms, independent contractors and fleet operators. AWH acknowledges that it has limited control over how the employees of these suppliers are engaged, remunerated and treated.

In order to meet the needs of our customers, there are times when AWH engages the services of labour hire firms. Prior to engagement, AWH requires labour hire firms to:

- maintain labour hire licences;
- verify compliance with modern slavery practices via our Modern Slavery Questionnaire;
- ensure compliance with the same job, same pay reforms introduced through the *Fair Work Legislation (closing Loopholes) Act 2023* (Cth); and
- demonstrate adherence to labour laws and regulations, including maintaining working rights.

AWH engages fleet operators to provide transport services as part of our operations. Transport services include the provision of trucks and drivers. The agreements governing these relationships are negotiated between AWH and the fleet operator. As part of the onboarding process, fleet operators must verify compliance with modern slavery practices via our Modern Slavery Questionnaire, demonstrate adherence to labour laws and regulations and demonstrate adherence to chain of responsibility and heavy vehicle national laws and regulations. We also require fleet operators to understand their modern slavery obligations when subcontracting transport services.

At times AWH may engage the services of independent contractors to bolster our specialist capability. Agreements for these services are negotiated with the independent contractor and Our independent contractors demonstrate a sound understanding of the nature of self-employment, the application of laws and the risks associated with modern slavery.

Facilities Management

At AWH, facilities management predominately incorporates cleaning and maintenance services. Like indirect labour, these services may present inherently higher modern slavery risks given the industry's reliance on low-skilled and/or migrant works and widely adopted low profit margin fee structures. To mitigate the risks associated with the engagement of these suppliers, AWH has adopted the following onboarding process:

- suppliers verify their compliance with modern slavery practices via our Modern Slavery Questionnaire; and
- AWH uses supplier agreements which highlight our expectations in relation to modern slavery risks, mitigations and practices

Procurement of Goods

AWH recognises that it could contribute to modern slavery risks through the procurement of certain goods used to support its operations. These goods include PPE, uniforms, office equipment and consumables, plant and equipment and IT hardware. AWH acknowledges that many of these goods are manufactured overseas. The purchase of goods manufactured overseas presents additional modern slavery risks in instances where the source country has limited labour laws, an absence of modern slavery protections and is a low-cost country. There may also be an absence of material traceability by suppliers. AWH has limited control over the operational and employment practices of these suppliers, however AWH acknowledges that it has a role to play in promoting ethical procurement practices and educating suppliers and



manufacturers on the importance of addressing modern slavery.

Where feasible, AWH prioritises the procurement of goods which are manufactured and supplied in Australia.

4. ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

AWH is adopting a systematic approach to identifying, assessing and addressing potential modern slavery risks in our operations and supply chain.

Policies and Governance

AWH maintains a suite of policies which address the risk of modern slavery in the operations of our business and our supply chain. The implementation of these policies internally has been supported by AWH's human resources team, our safety and compliance software, DoneSafe and our human resources and onboarding platform, ELMO. The following policies are key in AWH's prevention of modern slavery:

- Modern Slavery Policy
- Whistleblower Policy
- Contractor Management Policy
- WHS Policy
- Bullying, Harassment and Sexual Harassment Policy
- Complaints Handling Policy
- Equity, Diversity and Inclusion Policy
- Employee Code of Conduct
- Recruitment and Selection Policy
- Business Ethics and Conflicts of Interest Policy
- Risk Management Policy
- Contract Policy
- Discipline Policy

Contractually we require our suppliers to comply with a number of these policies to ensure that AWH operates safely and in compliance with all applicable laws and regulations. These policies are regularly reviewed to ensure they remain relevant and applicable to our operations.

Modern Slavery Awareness

The Executive Team and Board of AWH continues to champion the importance of AWH's compliance with modern slavery practices.

In the Reporting Period, modern slavery training formed part of our induction program for all new employees. This training includes information on the different types of modern slavery, how to identify modern slavery and how modern slavery risks exist in our business and the industries we operate in. Broader training was provided to all AWH employees on the following key policies: WHS, bullying harassment and sexual harassment, equity diversity and inclusion, employee code of conduct and business ethics and conflicts of interest.

The Executive Team continues to encourage all employees to openly identify and discuss risks, including modern slavery risks, and familiarise themselves with procedures that can minimise such risks. Modern slavery awareness posters were produced and are displayed in all of our



sites.

We continued to consult with the Board and key employees of IWD Pty Ltd (AWH has a 50% shareholding) to ensure that they understand modern slavery risks.

Supplier Management

During the Reporting Period, AWH continued to embed the following supplier processes:

- ensuring contracts with suppliers include a specific modern slavery clause which references AWH's Modern Slavery Policy, in addition to clauses requiring suppliers to comply with all applicable laws;
- ensuring contractors with suppliers include appropriate dispute resolution clauses;
- engaging reputable suppliers, who are Australian based where feasible;
- requiring all potential suppliers to complete our Modern Slavery Questionnaire prior to AWH agreeing to engage their services. The completed questionnaires continue to be reviewed by our in-house lawyer and a decision is made on a case-by-case basis whether the supplier should be used;
- providing a copy of AWH's Modern Slavery Policy to all potential suppliers.
- collecting and reviewing all supplier modern slavery policies (where possible); and
- promptly completing all modern slavery questionnaires and requirements where required by our customers.

5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

AWH is committed to continuously reviewing, revising and improving its approach to managing and mitigating the risks associated with modern slavery across our operations and supply chain, in line with the UN Guiding Principles. A key element of this continued improvement cycle is monitoring the effectiveness of our processes and procedures. Our assessment adopts qualitative and quantitative indicators, including:

- assessing our employees' understanding of modern slavery risks by requiring them to undertake written modern slavery tests after modern slavery training;
- tracking all employee training records to ensure training is completed in a timely manner;
- maintaining our Modern Slavery Register which stores all completed modern slavery questionnaires and documents;
- maintaining of our Risk Register which stores details regarding modern slavery risks;
- reviewing and updating key policies to evaluate whether they are fit for purpose;
- communicating with suppliers regarding their obligations and compliance requirements in relation to modern slavery;
- ensuring all supplier contracts incorporate modern slavery obligations and compliance requirements;
- ensuring tender documents include modern slavery compliance requirements; and
- seeking feedback on our modern slavery practices from our suppliers, customers and key stakeholders.



6. CONTINUOUS IMPROVEMENT

To enhance AWH's effectiveness in reducing the risk of modern slavery in our operations and supply chain, AWH has identified the below priorities for FY26:

- expanding our employee training and awareness activities through the introduction of a new modern slavery e-learning module;
- reviewing AWH's enterprise risk management framework, including modern slavery risks, to ensure it remains best in class and fit for purpose;
- designing an internal review process of AWH's Modern Slavery Register; and
- continuing to collaborate with customers, suppliers and key stakeholders to identify opportunities and learnings in relation to modern slavery.

This statement has been approved by AWH Pty Ltd's Board of Directors.

Signed by:

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Jason Varsamidis
Chairman of the Board
AWH PTY LTD

Dated: 28 October 2025 | 2:20 PM AEDT