

**20Cube**

# **Modern Slavery Statement**

**1 April 2023 to 31 March 2024**

## **1 Introduction**

This modern slavery statement is a joint statement made pursuant to the S6 of the Modern Slavery Act 2018 (Cth) (“the Act”) for the period 1 April 2023 to 31 March 2024 on a voluntary basis and has been approved by the boards of Directors of 20 Cube Australia Holdings Pty Ltd (ACN 156 389 212 and covers both itself and its subsidiary company 20Cube (Logistics) Pty Ltd (collectively referred to herein as “20Cube”).

This statement is 20Cube’s first Modern Slavery Statement.

In this statement, unless defined differently herein, words have the meanings given to them in the Act.

This Modern Slavery Statement addresses the seven mandatory criteria set out in s16(1) of the Modern Slavery Act. The content list below identifies where the response to each criterion is located within this statement:

1. Identify the reporting entity;
2. Describe the structure, operations and supply chains of the reporting entity;
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls;
4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes;
5. describe how the reporting entity assesses the effectiveness of such actions;
6. describe the process of consultation with:
  - a. any entities that the reporting entity owns or controls; and
  - b. in the case of a reporting entity covered by a statement under section 14 the entity giving the statement; and
7. include any other information that the reporting entity, or the entity giving the statement, considers relevant.

## **2 Overview of Reporting Entity**

20Cube Logistics Pty Ltd, a wholly owned subsidiary of 20 Cube Australia Pty Ltd Holdings and is an Australian registered logistics and technology solutions based in Australia. While 20Cube has no statutory obligations to have a Modern Slavery Statement or participate in the legislated reporting in place for large companies, the directors of 20Cube have identified that there may be some risk that modern slavery may be associated within certain parts of its supply chain. Accordingly, in keeping with 20Cube values it has elected to voluntarily provide a Modern Slavery Statement and participate in the requisite annual compliance reporting.

## **3 Structure operations and supply chains of Company**

### **3.1 Structure**

As stated above, 20Cube Logistics Pty Ltd is a private company owned by 20Cube Holdings Pty Ltd which in turn is owned by 20Cube Logistics Pte Ltd a private company registered in Singapore, and which is part of a wider global group of logistics companies. 20Cube Logistics Pty Ltd is the operating entity for 20Cube in Australia.

### **3.2 Operations**

20Cube through its operations offers its customers full logistics solutions which includes:

- *Freight Forwarding* (Ocean, Air and land, including consolidation services to simplify the customers supply chain in a cost effective way and improve container utilization);
- *Warehousing and Distribution*;

- *Customs and Compliance*; and
- *MyHubPlus* a proprietary technology package developed by 20Cube to automate and enhance all aspects of the customers supply chain logistics process.

20Cube Australia has implemented the following company policies in relation to its Australian workforce and supply chain:

- Risk Management Policy and Procedure;
- 20Cube Code of Business Conduct;
- Ethics, Bribery and Anti-Corruption Policy; and
- Anti-Discrimination, Bullying & Harassment

### **3.3 Supply Chains**

20 Cube has undertaken an overall assessment of its supply chain with our initial focus on a transaction value basis and risk level approach. We have assessed the industry in which we operate, types of services and goods that we procure, geographical risks associated with the country of origin of the goods or services and identifiable supply chain risks.

We have undertaken an assessment of the risk of modern slavery in our supply chain on a transactional basis by vendor type and assigned risk profiles from no risk, low risk, medium risk and high risk.

20Cube considers that the occurrence of modern slavery practices is more likely to involve activities performed overseas involving a low to semi-skilled labour force.

Where Services or Goods are obtained within Australia the risk of modern slavery is determined to be negligible due to the regulation of our labour markets within Australia.

In terms of shipping transactions, 20Cube, through its agents deals with multinational shipping and air freight companies which are almost without exception large companies who have generally implemented their own modern slavery statements and robust internal procedures. Accordingly, such companies which by transaction value account for 98% of 20Cube Australia's transactions are low to nil risk.

In circumstances that a third-party company does not have formal policies in relation to modern slavery 20Cube will require the vendor to undertake to comply with the requirements of the Modern Slavery Act and 20Cube's associated policy.

20 Cube engages its transport contractors and numerous other subcontractors and third parties to enable the provision of services within Australia and globally. Due to this essential use of third parties, 20Cube Australia recognizes that it is at risk of causing or contributing to modern slavery risks.

The relative risk exposure will be dependent on the country and service which is being performed. There are also risks associated with the provision of other services and goods within 20Cube Australia's supply chain that vary in severity and are dependent on the service or good provided, where the service is being provided or where the goods have been sourced from.

As at the date of this statement, 20Cube is not aware of any incidence of Modern Slavery activity in its supply chain.

#### **4. Description of risks of modern slavery practices in the operations and supply chains**

Due to 20Cube carrying out business on a global basis, there is a risk that it may unknowingly cause or contribute to modern slavery through the use of third parties engaging labour in countries with lesser employee protections or by using labour-hire providers. As these services are primarily controlled by agents of 20Cube Australia we have greater ability to understand practices and implement change so the overall exposure to modern slavery risks which we may directly cause or contribute to is minimised.

##### **4.1 Geographical Risk**

High risk countries in which 20Cube conducts transactions account for less than 0.5% of total transactions for the reporting period. The high-risk countries include:

- Pakistan;
- Papua New Guinea;
- Saudi Arabia;
- Türkiye; and
- United Arab Emirates.

The activities engaged in relation to these countries consist of various agents who take bookings on behalf of 20Cube and are considered low risk. Other activities include freight services provided by Emirates Air and some minor third-party company transactions (less than 5k).

Medium risk countries in which 20Cube conducts transactions account for 1.6% of total transactions for the reporting period. The high-risk countries include:

- Bulgaria - agents;
- India – agents, Air freight and professional services
- Indonesia - agents
- Mexico – third-Party company – freight forwarder (No apparent Modern Slavery Statement or Policies)
- Peru - agents
- Philippines – agents and third-party company – global logistics company with Modern Slavery Statements and policies.
- Romania – agents.
- Sri Lanka - agents and third-party company– global logistics company with Modern Slavery Statements and policies.

Based on the activities provided by third party companies and agents the vast majority of the activities listed are considered to present a low risk, however the third-party company based in Mexico is deemed to be of medium risk in relation to its local employment practices and to the extent that 20Cube intends to continue engagement with this company appropriate contractual undertakings will be sought.

**5. Describe the actions taken**

In 2023, 20Cube formed a Risk Committee which identified the potential risk of 20Cube engaging in transactions which may have exposure to modern slavery risks.

20Cube then completed an assessment of its supply chain to identify and priorities risk areas that will progressively be addressed using several identified tools.

Resultant actions, policies and procedures are expected to be implemented progressively and refined during the financial years 2024 to 2025.

- Internal training – training to enhance key staff understanding of ways to identify modern slavery risks;
- Contractual mandates - Requiring Vendor’s to agree to comply with 20Cube Australia’s modern slavery policy;
- Incorporating Modern Slavery compliance requirements into 20Cube’s standard trading terms and conditions.


**6. Describe how the reporting entity assesses the effectiveness of such actions**

The effectiveness of the tools will be assessed on an annual basis by a sub-committee of the Risk Committee consisting of the CEO, CFO and Company Secretary.

This Modern Slavery Statement has been approved and signed by the board of directors, 20Cube Australia Holdings Pty Ltd and on behalf of its subsidiary 20Cube Logistics Pty Ltd in accordance with S16(2)(a) of the Act:

Executed by


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Director Signature:  G5861A06B5E74E4.....

Name (Director): Mahesan Niruttan .....

Date: 25 July 2024 .....

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Director Signature:  9355C76D12C64C4.....

Name (Director): Stewart Adrian Schneider-Loos .....

Date: 25 July 2024 .....

