



**2025 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

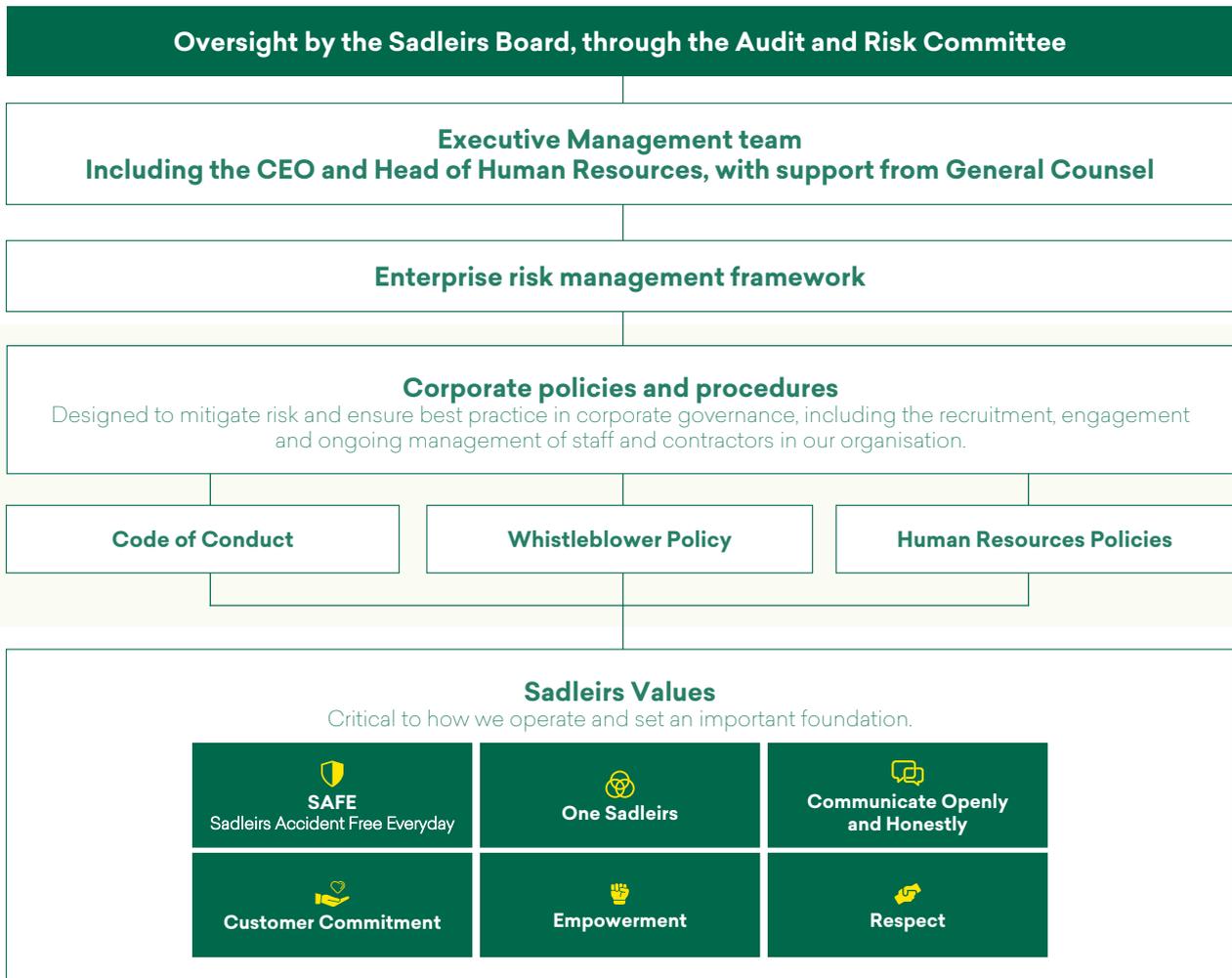
*R.C. Sadleir Pty Limited (ABN 65 008 667 052) and its related bodies corporate. The reporting entity is R.C. Sadleir Pty Limited, as the parent company in the Sadleirs Group. Unless expressly stated otherwise, this Statement applies to R.C. Sadleir Pty Limited and its subsidiaries as a whole. During 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.

Our Governance

Sadleirs is governed by a Board that is the guardian of Sadleirs culture and values. It is responsible for the overall management and strategic direction of Sadleirs and for delivering performance in accordance with Sadleirs' goals and objectives. Sadleirs is made up of Directors appointed in accordance with Sadleirs' Constitution. The Board has an appropriate number of independent, non-executive directors who hold management to account and who act in the company's best interests.

To assist the Board in the performance of its responsibilities, it has established a standing Audit & Risk Committee. This Committee has responsibility for risk identification, management and mitigation of risk.

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 is committed to uphold the dignity of every individual by identifying, managing and reducing the risk of modern slavery across its operations and supply chains.

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.

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.

Sadleirs continues to increase its focus in sustainable procurement which includes modern slavery clauses in contractual arrangements with third parties. Such clauses are included in our Supplier Contracts, which are entered into with our manufacturers of products which we sell, our standard template contracts with our customers who we supply services or products to and contractors who provide services to Sadleirs.

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.

We have a Supplier Code of Conduct which applies to all our Suppliers if they enter into a commercial relationship with Sadleirs. Under the Supplier Code of Conduct, Suppliers must uphold and protect internationally recognised human rights and provide fair, safe, and non-discriminatory workplaces including: no use of child labour, no forced or involuntary labour, fair wages and working hours; non discrimination and respect for freedom of association and right to collective bargain

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.

Sadleirs procurement framework and governance procedures are evolving to identify and remove suppliers where there is any evidence of modern slavery. An initial supplier compliance audit and annual re-audit of suppliers who produce products for us is conducted. Suppliers are required to provide information and certification (if available) as to employee conditions and modern slavery protections.

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.

At induction, all employees and contractors are informed of our Code of Conduct (which expressly states Sadleirs is against all forms of slavery, human trafficking, forced or bonded or child labour).

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, inhuman or unethical practices.

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.

A handwritten signature in black ink.

David Cole
Chief Executive Officer

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