

RÖHLIG LOGISTICS

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This statement formalizes the commitment of Röhlig Logistics GmbH & Co. and its subsidiaries (“Röhlig Group”) to preventing slavery and human trafficking statement for the year ending 31 December 2020 throughout its operations and activities worldwide, as well as to ensuring that procurement activities are performed in compliance with this commitment.

Röhlig Group is subject to a number of anti-slavery laws that consider Slavery and Human Trafficking as a criminal offence and a violation of fundamental human rights, such as the UK Modern Slavery Act 2015 and the Commonwealth Modern Slavery Act 2018.

Slavery is an umbrella term for activities involved when one person obtains or holds another person in compelled service.

Someone is in slavery if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an ‘employer’, usually through mental or physical abuse or threat of abuse
- Dehumanized, treated as a commodity or bought and sold as ‘property’
- Physically constrained or have restrictions placed on his/her freedom

These situations extend to forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

Within the Röhlig Group, suppliers are subjected to a comprehensive vetting process – in order to verify the adherence to the Röhlig Group’s policies, including the Code of Conduct for Suppliers and Business Partners, which covers human rights and fair labor practices.

This statement applies to all persons working for the Röhlig Group or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. working on its behalf if they breach this statement.

Structure, operations and supply chains

Röhlig in Australia is represented by Röhlig Australia Pty. Ltd., an Australian proprietary limited company, wholly owned by Röhlig Logistics GmbH & Co. and registered at Moorebank Business Park, Unit 1, 2 Secombe Place, Moorebank, NSW, 2170, Australia.

Röhlig's business entails air freight, sea freight, and contract logistics. The Australian head-office is based in Sydney and this statement applies to all Australian operations and global supply chains.

Röhlig procures services to allow the provision of freight forwarding and logistics, which includes the engagement with subcontractors and agents around the globe. In order to mitigate the risk of modern slavery, child, forced and bonded labor and human trafficking in our operations and supply chains, we count on a Vendor Vetting process based on a comprehensive questionnaire that allows a risk based assessment of local suppliers.

Throughout the vetting process, Röhlig suppliers commit to sustainable procurement practices, which include preventing slavery and human trafficking, amongst other misconducts. In addition, suppliers are screened against sanctions and restrictions lists in order to attest the accuracy of provided information.

Risks of modern slavery practices in Operations and within the supply chain

Operations

Röhlig acknowledges that some of its global operations are exposed to modern slavery related risks. Services are subcontracted and, sometimes sourced to agents throughout the world, where Modern Slavery is not subject to sufficient legal safeguards.

Röhlig in Australia engages in majority with domestic suppliers, based in Australia, thus limiting the geographical risk of facing Modern Slavery.

Supply chain

As part of the vetting process, an internal risk-mapping is conducted by the Röhlig Group supply chain operations in all countries.

At this stage, we have identified one area that may present a risk of Modern Slavery in our direct suppliers of haulage and transport services.

Combatting this risk is enabled by our effective Supplier Vetting and Onboarding system that enforces that no Slavery or Human trafficking is taking place anywhere within our internal or external supply chain. The same high Röhlig standards are expected from all of

Röhlig contractors, suppliers and other business partners.

Röhlig Group has zero-tolerance to slavery and human trafficking and is committed to act ethically and with integrity in all of its business dealings and relationships. Business partners are to comply with our Code of Conduct for Suppliers and Business Partners and to agree to uphold Human Rights internationally.

Actions taken to assess and address risks, including due diligence and remediation processes

Risk assessment

Röhlig established a working group which is supporting all countries in identifying legal and regulatory requirements to adhere to the Modern Slavery Act (“MSA”). Part of the support is to assess, review subcontractors, suppliers, and agents, and to provide training to our Agents and other suppliers on demand.

We further differentiate in four supplier groups:

Group 1

Australian company with high risk category services (e.g. uniforms, cleaning, temps workers).

Group 2

Australian company not related to Group 1

Group 3

International company, low risk on Global Slavery Index (“GSI”) and low geographical risk

Group 4

International company, high risk on GSI, category of services, geographical location risk is high.

Supplier contracts

All Röhlig suppliers must adhere to and abide by the Code of Conduct for Suppliers and Business Partners, which requires its suppliers to carry out their business activities with integrity, to comply with the law, including Human Right law. It specifically prohibits Röhlig suppliers and business partners from forced employment or child labor. The Röhlig Code of Conduct for Suppliers and Business Partners entails clauses that form part of the supplier approval process. Such clauses require our suppliers to comply with all applicable Anti-Slavery and Human Trafficking laws, including the MSA, and to maintain policies and procedures to ensure not engaging in any activity, practice or conduct that would constitute Modern Slavery.

Audit outcome and training

2020 Audit; In December 2020, the Röhlig Working Group sent Modern Slavery questionnaires and compliance forms to all Group Members. The audit found no significant

risk of Modern Slavery. Learnings of this audit included a need for increased supplier participation and a heightened accuracy of responses.

Whistleblowing policy

Röhlig allows the reporting of concerns in an anonymous way, by anyone inside and outside the organization that has a grounded suspicion of any legal or ethical violation, including, but not limited to Modern Slavery.

If suppliers or business partners are suspected to violate any applicable law, or any internal policy or contractual arrangements with Röhlig, the relationship can be terminated or, depending on the case, Röhlig will work together with the relevant supplier to improve its performance.

Employees are expected to notify their manager or make use of the whistleblowing hotline. If an employee believes or suspects that a conflict with this statement has occurred, or may occur in the future. Röhlig may terminate relationships with other individuals and organizations.

Effectiveness of actions taken

Röhlig is committed to taking strong steps to ensure that our Modern Slavery policies, audits, and assessments are effective at identifying and removing any Modern Slavery from our operations, supply chain and that of our suppliers.

Röhlig working group meet on a regular basis and is tasked with:

1. Reporting and making recommendations on the roll-out of Modern Slavery policies and procedures;
2. Reporting on internal and external audits of supply chains, the tier or scope and frequency of the audit;
3. Reporting and making recommendations to the Board on new Modern Slavery compliance measures.

Training for stakeholders

Röhlig has commenced training for key stakeholders (including middle management and senior leaders) of the business. Röhlig accepts that the success of its Modern Slavery compliance will be largely dependent on a well-educated workforce. To date, Röhlig believes the success of its Modern Slavery policies and procedures roll-out has been largely as a result of a strong and committed global workforce (including members from Legal, Compliance, HR, and Procurement) working seamlessly in tandem to ensure its success.

Audit and monitoring

Röhlig conducts regular audits through sending questionnaires and compliance forms to all Group Members in order to properly monitor the follow-up of our policies. By doing this, Röhlig is able to reinforce the implementation of the Anti-Slavery and Human Trafficking Statement at all levels.

Process of consultation with any of the reporting entities or controlled entities

N/A - this process is not applicable to Röhlig.

Other relevant information

What is Röhlig Group doing?

Röhlig Group is committed to transparent operations, supply chains, and suppliers. It is actively working together with its partners, to rid/prevent Modern Slavery from its global operations and supply chains. To assist with this effort, Röhlig Logistics GmbH and its subsidiaries have filed Modern Slavery Statements.

Next reporting Period

In 2021-22, Röhlig is committed to:

- Expand the relevant stakeholders in our Modern Slavery Steering Working Group;
- Periodically distribute Modern Slavery questionnaires, record and assess the results, and support with any required mitigation;
- Adopt a mitigation procedure for when Modern Slavery is detected in its operations, supply chains or its suppliers' supply chains.

This statement was approved by the board of Röhlig Australia Pty Ltd on 14 July 2022.



Philip Herwig



Dr Robert Gutsche



Hylton Gray



Thomas Hansen



John Luk