

HENNINGHARDERS

2022 Modern Slavery Statement

Table of contents



1. Who we are & our commitment	Page 3
2. Our Structure, Operations and Supply Chain	Page 4
3. Risks of Modern Slavery in our Operations	Page 5
4. Risks of Modern Slavery in our Supply Chain	Page 6 - 7
5. Implications of COVID-19	Page 8
6. Actions taken in the Reporting Period	Page 9 - 12
7. Assessment and effectiveness of our actions	Page 13
8. Our plans for future action	Page 14



1.0 Who we are & our commitment

1.1 Our Statement

This Modern Slavery Statement is made on behalf of Henning Harders (Australia) Pty Ltd (“HHA”) pursuant to the Australian Modern Slavery Act 2018 (the “Act”) for the 2021 / 2022 Australian Financial Year.

This statement has been approved by the Executive Management Team, and by Christian Harders, the sole director of Henning Harders (Australia) Pty Ltd on 30 December 2022.

The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour (“Modern Slavery”).

1.2 Who we are & our commitment

As an Australian Family-Owned business founded on the one simple principle: “Be passionate, make friends and help people. Success will look after itself”, our definition of success goes well beyond dollars and cents and starts with how we do business, and who we do business with.

This principle is lived daily by all our employees and reflected in our values, specifically our value of mutual success. As such we have a genuine and sincere commitment to human rights and the elimination of Modern Slavery, and look forward to reporting on our continuous

improvement in this space moving forward.

Beyond Modern Slavery, HHA has identified three key areas of focus on how we can make an impact on the world for the better;

1. Sustainability & Environment;
2. Diversity; and
3. Charity.



“Be passionate, make friends and help people. Success will look after itself” – Henning Harders



2.0 Our Structure, Operations and Supply Chain

2.1 Our Structure

HHA is a privately owned proprietary limited company conducting business as a global supply chain expert, which involves the provision of freight forwarding, customs brokerage, wharf cartage and warehousing services to our clients using both our own offices in Australia as well as our extensive agent & supplier partnerships around the world.

2.2 Our Operations

HHA's operations include:

- Our own offices in Sydney, Perth, Melbourne, Brisbane and Wellington; and
- Agents located around the world which represent HHA in performing logistics services overseas.

2.3 Our Supply Chains

Our business model and success as global supply chain experts is driven by our ability to strategically align ourselves with suppliers which are the best in their industry and geographic region.

As such our supply chain is primarily derived from the services we offer our clients as well as the regions our clients require these services performed to be performed in.

In Australia, the provision of freight forwarding services to our customers creates supply chains which include trucking companies, warehousing companies, shipping lines and air carriers.

Overseas, where agents are engaged to provide freight forwarding, customs clearance, trucking or warehousing services to HHA on behalf of HHA's clients, these supply chains are largely the same as described above. Separately, our supply chains also include the services & products that contribute to our operations, such as cleaning, accounting & auditing, stationery & IT which are primarily located in Australia.



HHA is a family business committed to the elimination of Modern Slavery.



3.0 Risks of Modern Slavery in our Operations

3.1 Our Australian Operations

Despite our operations being based in Australia, where there is less of a geographic risk of Modern Slavery, we do acknowledge that Modern Slavery does and continues to occur in Australia. This risk exists particularly in relation to vulnerable workers, immigrants and workers in low-skill positions or in casualised or insecure forms of work.

Being a family business, we consider our employees as extended family members and as such are committed to their health and wellbeing. This is strongly reflected in our company value of Mutual Success, which highlights our commitment to sustainable business practices which benefits all involved.

Whilst we do acknowledge that Modern Slavery can occur in Australia, 100% of our employees are skilled workers and professionals, which reduces the risks of Modern Slavery. The risk that HHA's operations could cause, contribute or be directly linked to Modern Slavery is relatively low, due to our industry, lack of use of labour in vulnerable populations (being low skill or migrant populations), low-risk geographies and non-use of labour hire.

3.2 International Agency Agreements

As outlined previously, HHA has agency arrangements with overseas companies to provide freight forwarding, customs clearance, trucking or warehousing services to HHA on behalf of HHA's clients. This includes agency arrangements in Asian and South American regions which have a higher geographical risk of Modern Slavery.



As a part of the international transportation supply chain, HHA acknowledges that there is a risk that our operations, as a freight forwarder, have the capacity, without proper safeguards, to contribute to or facilitate illegal trafficking in goods and human trafficking. In acknowledgement of these risks, HHA has safeguards in place regarding customs declarations and container security so as to eliminate in so far as is possible the risks that our operations may be utilised for illegal purposes. These safeguards have been implemented in line with our Australian Trusted Trader accreditation.



4.0 Risks of Modern Slavery in our Supply Chain

Our review process

As part of HHA's review of Modern Slavery risks in our Supply Chain, a risk matrix was developed to assess the key supplier segments being; Agents, International Carriers, Domestic Transport, Warehousing and Suppliers contributing to our operations such as cleaning, accounting & auditing, stationary & IT. Our efforts in year 1 of reporting focused on Tier 1 suppliers.

These supplier categories were then assessed based on Industry Risk, Geographical Risk, Product Risk as well as total spend in the reporting period. Based on this analysis we identified the following:



4.1 Agents

HHA has agency arrangements with over 100 agents worldwide to provide logistics and transport services to our clients. These agency arrangements are largely long-term. The majority of our agency work for the reporting period involved agents operating in low-risk geographic regions across Europe, and in areas where transport and logistics were not identified as high-risk industries in those geographic areas according to the Global Slavery Index.

As part of our commitment to continuous improvement in addressing Modern Slavery, we will continue to undertake investigations in subsequent reporting periods to obtain increased visibility over the operations and supply chains of agents located in the higher risk geographic regions, such as China, Indonesia, India and The Philippines. As part of this we will work to maintain and review our due diligence process to ensure that prior to entering into these agency arrangements, HHA has better visibility over the agent's supply chain and operations with respect to Modern Slavery.

We further note that logistics is not a high-risk industry within these higher risk geographies, though acknowledge our agents may engage suppliers in higher risk industries in order to provide services to us and our clients. The lengthy and complex nature of international transport supply chains can make visibility difficult to achieve and is itself a Modern Slavery risk factor.

4.2 International carriers

As a freight forwarder, HHA's key supply chains are sea and air carriers engaged to facilitate the transportation of our clients' goods worldwide. HHA engages reputable carriers to provide services to our clients, most of which have documented Codes of Ethics and Sustainability Statements in place. Notwithstanding this, noting the lengthy supply chains of sea and air carriers, and the relative size of these entities when compared to HHA, we acknowledge that we have limited visibility and control over these supply chains or the actions of our suppliers for these types of services.



4.0 Risks of Modern Slavery in our Supply Chain

4.2 International carriers (cont)

HHA also acknowledges that COVID-19 has had a large impact on the international transport industry, and that seafarers have been greatly affected by the pandemic, with increased time at sea, lack of shore leave and difficulties in re-patriating crew members due to border controls and government action to limit the spread of the coronavirus. While, as a freight forwarder, HHA is not able to directly effect change in this space, we are keeping ourselves informed of developments in this space, noting the increased risks of forced labour that may be occurring in this supply chain due to the pandemic. We will also include a question on this issue in supplier questionnaires for carriers.

4.3 Domestic Transport & Warehousing

HHA utilises the services of domestic truckers and warehouses to undertake the transport and local warehousing component of the services we provide to our customers. The subcontracting arrangements with these suppliers provides limited visibility over the workers, especially those employed in the warehouses. As part of our 2023 actions to mitigate the risk of Modern Slavery in our supply chain, we will seek to continue to gain better visibility over these workers. Despite this, we consider the Modern Slavery risk low, due to the skilled nature of the workers as well as the services being performed in the low-risk country of Australia.

4.4 Operational Suppliers

HHA utilises a range of suppliers to support its operations, but not directly linked to the services provided to our clients. These suppliers provide various goods and services to HHA, including cleaning and professional services.

Professional service providers for accounting, auditing and legal purposes are provided to HHA by Australian-based entities. We have assessed the risks of Modern Slavery in these professional services supply chains to be low, considering their location in Australia, the skilled nature of the services being provided and the skilled nature of the labour required to perform those services. Notwithstanding this, investigations will be carried out in subsequent reporting periods into whether there are any Modern Slavery concerns with these providers related to the outsourcing of services overseas.

HHA understands that the commercial cleaning industry has a higher risk of Modern Slavery, even in Australia. At our Sydney and Brisbane offices, HHA does not have direct oversight over cleaning services, which are managed by the building manager. In 2023, we will investigate further to try and achieve visibility over this component, and better assess the risks of Modern Slavery in the cleaning services provided to HHA's offices. At our Melbourne office, HHA engages directly with our cleaners and as such has direct contact with their management to gain a better understanding of their risk mitigating actions in future reporting periods.

HHA also sources computer and IT products from various suppliers. These suppliers are based in Australia, however HHA is aware that most computer products have a high product risk of Modern Slavery. In order to mitigate against this risk moving forward, HHA will continue to source computer and IT products from reputable brands which have published Modern Slavery statements in place. Additionally, as part of our commitment to the environment, our offices transitioned to be paperless long before this reporting period. As such any paper & stationery items purchased during the reporting period is minimal and supplied by reputable Australian companies with published Modern Slavery statements.



5.0 Implications of COVID-19

Operations and Supply Chain Impacts

COVID-19 has impacted our operations through all employees located in Sydney, Melbourne, Perth and Brisbane working from home during the 2022 period, as dictated to by local government regulations. Since the relaxation of those rules, we continue to work in a hybrid way of split working weeks between home and office.

HHA acknowledges that Modern Slavery risks associated with our international transport supply chains have been exacerbated by the COVID-19 Pandemic. As a result of the pandemic, the disruption to international trade and transport and border control and quarantines, there have been issues with repatriation of seafarers and with the voyage limits on seafarers being exceeded, elevating the risk of Modern Slavery in this supply chain.



6.0 Actions taken in the Reporting Period

In addition to the abovementioned actions, during the reporting period HHA has undertaken or had the following measures in place to address risks of Modern Slavery in our operations and supply chains.

6.1 Conducted Training on Modern Slavery

On the basis that understanding Modern Slavery is the first step to being able to address the risks of it occurring in our operations and supply chains, during the reporting period HHA continued our mandatory training for all employees and management on the issue of Modern Slavery. This action raised awareness of the issue of Modern Slavery within the business, and provides a foundation for further action.

The training provided employees and management with information on:

- What constitutes Modern Slavery;
- The risk factors that cause or contribute to the prevalence of Modern Slavery;
- How Modern Slavery occurs world-wide, even in Australia;
- How to identify Modern Slavery;
- What HHA is required to report on; and
- How to work with suppliers to address risks of Modern Slavery.

This training is undertaken as part of each employees onboarding.

As part of our commitment to working with our suppliers to address Modern Slavery, we have communicated to our employees that suppliers requesting assistance with Modern Slavery can be provided with HHA's training module on Modern Slavery.

6.2 Dedicated Communication Channel

In the previous reporting period, HHA established a dedicated email address for Modern Slavery concerns, being antislavery@harders.com.au. Our employees continue to receive training to make them aware of this email for:

- Suppliers and entities in our supply chain to use if they are interested in Modern Slavery training and resources;
- For the reporting of Modern Slavery concerns by staff.

In the next reporting period, this email address will be incorporated within our Whistleblower Policy, and made available on our website.

6.3 Code of Conduct

HHA has a comprehensive Code of Conduct which sets out our expectations of behaviour with respect to our staff and contractors. All employees receive training on the Code of Conduct, which requires our workers to comply with all laws and promptly report violations of laws, and that requires workers to treat persons with regard to their rights and dignity.

HHA has committed to updating the Code of Conduct so as to include statements directly addressing Modern Slavery, and setting out our commitment to doing our part to assess and address risks of Modern Slavery in our operations and supply chains.



6.0 Actions taken in the Reporting Period

6.4 Whistleblower Policy

HHA has a Whistleblower Policy which applies to employees, volunteers and contractors of HHA in relation to reports concerning wrongdoing. Our Whistleblower Policy reflects our commitment to the highest standards of legal, ethical and moral behaviour and demonstrates to our employees that HHA will not tolerate unethical, unlawful or undesirable conduct.

During the reporting period, coverage under the Whistleblower Policy included reports of dishonest, fraudulent, corrupt and illegal behaviour, and unsafe work practices. In the next reporting period, HHA has committed to:

- Including explicit references to Modern Slavery within the Whistleblower Policy;
- Expanding of coverage for reports related to Modern Slavery under the policy to include suppliers (and their employees) and entities within our supply chains; and
- Making the policy publicly available.

During the reporting period, HHA did not receive any reports of wrongdoing under the Whistleblower Policy.

6.5 Anti-Bribery and Corruption

HHA understands that slavery and other forms of exploitation are facilitated and thrive by the use of corruption.

HHA has a Policy for Countering Bribery and Corruption which codifies our commitment to open and honest business practices that are free from bribery and corruption. The operation of the policy means that payments in cash are strictly prohibited and any overseas disbursements on behalf of clients or suppliers are tracked and reported to the Australian Government through AUSTRAC.

All employees have received training on HHA's Policy for Countering Bribery and Corruption, and how to identify practices by or with suppliers that may indicate a bribery or corruption issue, such as:

- Unusual payment requirements;
- Failure to follow the normal channels or processes;
- Inappropriate transaction relationships (such as family);
- Introduction of third parties into a transaction to facilitate payments; and
- Splitting of contracts into smaller sums.

A process has been implemented within our Quality Assurance Procedures for the reporting of identified activities. No instances of actual or suspected bribery or corruption were reported to management under the policy during the reporting period.



6.0 Actions taken in the Reporting Period

6.6 Australian Trusted Trader

HHA is an accredited Australian Trusted Trader, and has been since 2017. Our accreditation with Australian Trusted Trader program demonstrates that HHA has been independently assessed and accredited by the Australian Border Force as against the World Customs Organization's standards.

Our accreditation is vitally important to our business, and HHA takes its obligations under the Australian Trusted Trader program seriously. As an Australian Trusted Trader, HHA and our business partners are required to maintain processes and procedures to ensure:

- The security of cargo loaded for transport;
- Accounting of any cargo discrepancies between cargo loads and declarations;
- The meeting of supply chain security standards; and
- Training for staff on supply chain security and trade compliance.

Compliance with the legal and regulatory framework governing the import and export of cargo to and from Australia is of central importance to our business, which is reflected in our Core Values and Expectations, performance reviews with staff, ongoing training and development, and auditing of customs processes to ensure conformity.

It has been recognised that customs processes and procedures are important in crime prevention and criminal justice, as they act as a first line of defence at borders against illegal trade and trafficking. The

supply chain security standards required by the accreditation are upheld by HHA during the reporting period and enables HHA to address the risk that its operations may contribute or be linked to Modern Slavery.

6.7 Road Transport Supplier Evaluations and Guidelines

HHA requires all Road Transport suppliers to adhere to our Road Transport Supplier Guidelines and prior to the commencement of subcontracted transport services the National Operations Manager assesses Road Transport Suppliers for various considerations, which include:

- Documented management plans for hazardous goods, working conditions and occupational health and safety;
- Management ethics and Corporate Governance; and
- Compliance with regulatory conditions.

While road transport in Australia requires licensing and is heavily regulated and audited (which reduces Modern Slavery risks), in subsequent reporting periods HHA will endeavour to update our Road Transport Supplier Guidelines to include explicit references to compliance with labour laws and regulations, and incorporate Modern Slavery risk considerations into our assessment framework for Road Transport Supplier Evaluations.



6.0 Actions taken in the Reporting Period

6.8 Supplier Code Of Conduct

Through the Supplier Questionnaire process undertaken during 2021, HHA has begun to develop a Supplier Code of Conduct to formally communicate HHA's expectations to existing and new suppliers. This comes as part of our commitment to working with our suppliers to address Modern Slavery.



7.0 Assessment & Effectiveness of our Actions

As noted previously, HHA did not receive any reports under the Whistleblower Policy or the Policy for Countering Bribery and Corruption. This may be a reflection of the lack of reportable conduct occurring in our operations requiring remediation, and indicate our actions have been effective, however it may also be an indication that further training needs to occur on these policies within our organisation, and that awareness needs to be raised of our policies within our supply chains. As noted above, coverage under our Whistleblower Policy will be expanded in subsequent reporting periods.

HHA set a goal for the reporting period of ensuring all management and staff received training on Modern Slavery, on the basis that an understanding of Modern Slavery across our company was the important first step to assessing and addressing risks of Modern Slavery in our operations and supply chains. This training program has been successful in terms of raising awareness amongst our employees, and was been completed by employees as at the end of the reporting period.

In the spirit of continuous improvement, HHA will continue to implement Modern Slavery KPIs on an annual basis, so as to set the goals to be achieved in subsequent reporting periods, and help us understand and assess how effective our actions have been, and circumstances where further action may be required.



8.0 Our plans for future action

As part of our commitment to eradicating Modern Slavery risks from our operations and supply chain we are committed to implementing the following measures:

1. Continue tailored engagement with Tier 1 suppliers to facilitate greater transparency over opaque supply chains;
2. Gain greater visibility of the international component of our supply chain by organizing international travel to meet face to face with our key international suppliers and agents;
3. Further developing our People and Culture capabilities within the business to better manage the administrative requirements that come with growth in agents and employees, specifically blue collar workers and policies;
4. Develop better reporting capabilities to gain greater insight into the touch points and quantum of the different elements of our supply chain;
5. Continue staff training on Modern Slavery;
6. Conducting site visits of Australian service providers to monitor working conditions, specifically warehouses and transport providers;
7. Identify areas for future improvement to continually improve our understanding of the risks of Modern Slavery in our operations and supply chains and how we can alleviate those risks;
8. Develop and implement KPIs in relation to our efforts to assess and address Modern Slavery risks in our operations and supply chains, so as to be able to better assess the effectiveness of our actions.
9. Update and adjust existing policies to include direct references to Modern Slavery, specifically how to report incidents of actual or suspected Modern Slavery or increased risks of Modern Slavery in our operations or supply chains.
10. HHA is committed to continuing to improve and build upon our efforts to combat Modern Slavery.



Christian Harders
Managing Director
28-Dec-22