Mainfreight Group – Modern Slavery Statement 2026

Introduction

This statement has been published and approved by Mainfreight Holdings Pty Ltd (ABN 24 084 637 605) in accordance with the *Modern Slavery Act 2018* (Cth) (**the Act**) on behalf of, and in partnership with, our relevant subsidiaries including:

- Mainfreight Distribution Pty Ltd (ABN 85 003 840 319);
- Mainfreight Air & Ocean Pty Ltd (ABN 65 007 252 333);
- Owens Transport Pty Ltd (ABN 64 060 592 529); and
- Carotrans Oceania Pty Ltd (ABN 31 118 822 487),

collectively **Mainfreight**.

We are committed to ensuring that we meet our customers' and communities' expectations in relation to assessing, addressing and seeking to reduce any potential modern slavery risks within our supply chains.

We respect and adhere to ethical labour practices and ensure that we, as well as any subcontractors or other third parties involved within our operations, are aware of and comply with all relevant laws and labour standards that are applicable where we operate.

This statement outlines the steps which we have taken during the financial year ending 31 March 2026 (**FY 26**) to assess and address modern slavery risks within our supply chains.

Structure, Operations & Supply Chain

We are owned and controlled by Mainfreight Limited (New Zealand Company Number 102720) which commenced operations in Auckland, New Zealand in 1978. Mainfreight Limited has since grown to operate 330 operational branches in 27 countries (across New Zealand, Australia, Asia, the Americas and Europe) with approximately 11,000 team members and owner-drivers which provide a full supply chain offering, which substantially includes:

Warehousing → storage of customer's goods, bonded warehouse management, management of inbound/outbound orders and inventory management amongst other value-added services;

Transport → domestic road and rail transportation of primarily palletised freight including our specialised dangerous goods division (Chemcouriers);

Cartage → movement of containers between customer locations and ports, storage of containers, fumigation and other ancillary services associated with containers; and

Air & Ocean → customs clearance, freight forwarding, transportation of goods by air and sea (domestic and international), packing/unpacking of containers and regulatory clearance.

Our Australian operations commenced in 1989, and we now employ approximately 2,752 team members within Australia. We also operate a substantial owner-driver network within Australia in addition to engaging other subcontractors and third parties. Owner-drivers are subcontractors which own/lease and operate the vehicles utilised to perform services on our behalf and are a critical component of how we drive improvement to quality and service level expectations within our Transport network.

Our owner-driver network is considered an essential part of our supply chain. These subcontractors, as well as other subcontractors and agents which are utilised, provide the majority of Transport and Cartage services on our behalf.

Outside labour-hire providers may also be engaged to perform certain minimal components of our services. Where outside labour-hire is engaged, any personnel are under the direct supervision and control of Mainfreight team members, and any services are supplied at a Mainfreight operated facility.

Other aspects of our supply chain include suppliers of trucks and vehicle components, material handling equipment providers, racking and other fixture providers, computer and IT network providers, uniform and PPE suppliers, maintenance contractors, operational and utility providers (e.g. waste collection, stock disposal, electricity suppliers, etc.), cleaners, pest control providers as well as food and beverage providers.

Our Air & Ocean brand provide services to customers within Australia and numerous other countries. Many of our overseas agents are also subsidiaries of Mainfreight Limited and the use of external third parties to organise the movement of freight internationally is limited. However, we must engage third party shipping companies and airlines to complete any services which involve the movement of freight via sea or air (where we are the party responsible to organise such service).

Furthermore, we continue to be involved in construction projects, resulting in various supply chains within the construction industry also being taken into consideration within our own supply chain.

Risks of Modern Slavery Within Mainfreight's Operations & Supply Chains

As e operate within the global logistics industry, there is a real risk that we may cause, contribute to, or be directly linked to potential modern slavery practices within our operations and supply chain.

Our operations can be performed on a global scale. Therefore, there is a risk that we may cause or contribute to modern slavery through the use of labour in countries with lesser employee protections or by using labour-hire providers. However, as the services are primarily controlled by subsidiaries of Mainfreight Limited, 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. Furthermore, as there are approximately 6,000 team members and owner-drivers, and approximately 54% of revenue was generated, in Australia and New Zealand (countries with notably strong labour conditions and protections) the risk is further reduced.

We engage our network of owner-drivers 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, we are at an increased 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 our 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.

Actions Taken by Mainfreight to Assess & Address Modern Slavery Risks

General review

Our plan to assessing and addressing modern slavery risks continues to focus on what we consider to be the most immediate and controllable risks and creating sound due diligence and remediation processes to reduce such risks. We will initially consider risks that are apparent in Australia which we have a real ability to control or influence.

We will then gradually seek to assess and address those modern slavery risks which may occur outside of Australia, are less likely to arise, are outside of our control or which we have less influence to rectify.

Sham contracting

Due to our engagement of owner-drivers and other third parties in supplying our services, we may not have full visibility on the employment relationship, or other contractual relationship, existing between the individual actually engaged, and the company we have contracted with, to provide such services.

During the 2019/2020 financial year (**FY 20**), we updated our contracts with these providers to strengthen existing contractual obligations by including additional warranties regarding worker payments and rights to work. We also implemented stronger procedures around our approval processes for additional drivers or subcontractors being engaged to provide the services.

Following on from the work completed in FY 20, we commenced a review of these contracts to determine what further protections could be implemented. This review was undertaken due to a spotlight being placed on the transport industry and the potential risks associated with sham contracting (a risk we were already mindful of). As a result of this review, we will be further strengthening these requirements and including additional contractual obligations (including stronger auditing rights) to continue to ensure that the risk of sham contracting is not present within our business.

Once finalised, the updated contract will be provided to all relevant providers once their contract is to be renewed.

Internal Audits

As part of our internal audit programme, all branches undergo a full audit, followed by a secondary audit for those falling below defined quality thresholds.

Audits cover key operational areas including transport, sales, compliance, customer service, and driver functions, with a strong focus on management responsibilities. The process includes team conversations, on-the-day checks, performance data analysis, and a team engagement survey offered to all team, owner drivers, and their drivers. A corrective action process is in place for branches to address identified gaps, and audit trends are reviewed annually with the executive team to drive continuous improvement.

We ensure that our policies, which govern our overarching risk management approach, are updated to represent current laws and regulations. We recognise that risk management and implementing actions to address such risks, form an integral part of effective governance and management.

External Programs

We participate in the SEDEX programme, which promotes improvements in ethical and responsible business practices. As part of SEDEX, we also complete the SMETA Audit process which assesses facilities across Labour and Human rights standards.

We are also a respondent to Ecovadis, an organisation which provides supplier sustainability ratings across a range of assessment criteria. This includes, environment, labour and human rights, ethics and sustainable procurement.

The results of each assessment are analysed and developed into a gap analysis and improvement plan for future audits and assessments.

Mainfreight's Assessment & Effectiveness of Actions to Reduce Modern Slavery Risks

We are committed to continually improving our processes and systems for managing and mitigating modern slavery risks in our business and the wider supply chain. This includes work to improve onboarding processes and the monitoring of compliance with terms of agreement and our supplier code of conduct.

Where areas of concern or potential breaches are identified we work in collaboration with partners to develop an appropriate improvement plan. This includes corrective actions to address the underlying causes of high-risk areas or violations to prevent further reoccurrence. Where improvement efforts are not addressed in good faith or do not progress within an adequate timeframe, we may take action to terminate the relationship.

We are not aware of any instances of modern slavery arising in our business or supply chains during FY 26.

Consultation Between Entities

This statement has been produced based on the collaborative effort of several different areas within Mainfreight. Input has been obtained from Legal, the Training Team (which includes Health & Safety and Compliance) and from our branches. The above teams are shared between the various entities which comprise Mainfreight and are able to effectively communicate any relevant changes which may only apply specifically to one entity.

Conclusion & Future Plans

As a major full supply chain operator performing services in Australia, we understand the importance of reducing modern slavery risks and using their influence to reduce such risks where we are able to do so.

We will continue to strive to identify and action other modern slavery risks within our supply chain and implement processes and procedures to effectively assess how are efforts help to reduce such risks from entering our supply chain. We understand that modern slavery is a difficult issue which may not be possible to eradicate entirely from our supply chains. However, we are committed to reducing such risks and removing them wherever possible.

This statement was approved by the principal governing body for Mainfreight, the Mainfreight Holdings Pty Ltd Board, on 7 August 2026.

CHEMCOURIERS MAINFREIGHT CaroTrans

Rodd Morgan
Country Manager – Australia
Mainfreight Group