

TEAM GLOBAL EXPRESS

FY22-23 Modern Slavery Statement



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1. Reporting Entities and Structure

This Modern Slavery Statement (Statement) is a joint statement made by Team Global Express (TGE) Pty Limited (formerly known as IPEC Pty Limited) in respect of the reporting period ended 31 March 2023 for the following reporting entities:

- Australian Parcels Group Pty Ltd (ACN 649 001 409)
- Australian Parcels Pty Ltd (ACN 649 001 418)
- IPEC Pty Ltd (ACN 084 157 666)

(together referred to as the Australian Parcels Group)

For the purposes of this Statement, TGE refers to the Australian Parcels Group.

Each reporting entity is an Australian private company.

This Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the "Act") and outlines the actions taken by TGE, to identify and address modern slavery risks across our supply chain and operations. This Statement also outlines our plans for the next reporting period.

2. TGE Operations and Supply Chain

Operations

TGE offers unique, innovative, and tailored solutions across road, rail, air, and sea, providing transport, logistics, and business solutions to our customers across Australia and New Zealand. TGE comprises the following business units:

- Intermodal and Specialised, including Linehaul
- Palletised Express
- Express Parcels
- Courier
- Tasmania
- New Zealand¹

As of 31st March 2023, our total direct workforce in Australia was 6485 employees and of that, 79% were male and 21% were female.

The total number of our casual workforce as of 31st March 2023 was 1017 employees and of that, 86% were male and 16% were female.

Supply chain

Across our multimodal logistics network, we work with an extensive system of suppliers, subcontractors, and agents.

¹ The services are provided by companies incorporated in New Zealand that are not reporting entities for the purposes of the Act. The New Zealand companies do not carry on business in Australia.



During the reporting period, our reporting entities procured approximately \$2.4 billion of goods and services from approximately 7000 direct suppliers along with approximately 3805 subcontractors. Approximately 99.5% of the total spend from our reporting entities was with direct suppliers located in Australia, with our highest spend category being Contracted Freight Services. We acknowledge that our direct suppliers may have operations in - or may source goods or services from - other jurisdictions which may have a higher risk for modern slavery.

TGE's procurement arrangements for the reporting period include the acquisition of products and services such as logistics subcontractors, agency labour, trucks, fuel, tyres, safety equipment, IT equipment, personal equipment, clothing (uniforms), stationery, cleaning, wrapping/packaging and hardware/software.

3. Risk of Modern Slavery in TGE Operations

Operational risk

We consider there to be a lower risk of modern slavery in our direct workforce when compared to our supply chain risk. The direct employees of our reporting entities are based in Australia and are engaged under employment contracts, or, for relevant frontline employees, Enterprise Bargaining Agreements approved by the Fair Work Commission. All employment arrangements are governed by the applicable laws and employment standards and meet these requirements at an absolute minimum.

As identified through our supplier hotspot analysis (Section 4 – Modern Slavery Hotspot Analysis), we acknowledge that there may be an inherent operational risk of modern slavery in our indirect workforce (such as contractors, sub-contractors, and labour-hire arrangements) which is classified as a high-risk business model as we do not have a direct employment relationship with these workers.

Supply chain risk

In line with the UN Guiding Principles on Business and Human Rights ("UNGPs") and the Australian Government's guidance for compliance with the Act, TGE took the opportunity to understand and manage our modern slavery risks through the full extent of its supply chains more deeply.

Following the previous reporting period, with the support of an external human rights and modern slavery adviser, we completed a hotspot analysis of inherent modern slavery risks in the supply chain of our reporting entities. Details are given below.

4. Modern Slavery Hotspot Analysis

Under this assessment, we reviewed our procurement data including key suppliers and spending information and discussed the data with the procurement function in detail.

We identified the categories of suppliers perceived to have a heightened modern slavery risk. We then reviewed the categories against key external sources (including



government, non-government organizations, and media reporting) to identify modern slavery hotspots in TGE's supply chain.

After comparison, we evaluated the indicative severity of each modern slavery hotspot against the UNGPs. We also assessed the potential likelihood of modern slavery occurring in each hotspot (without accounting for controls). We then mapped our hotspot in such a way as to show the indicative severity and potential likelihood of each hotspot and layered our assumed leverage in relation to each hotspot.

In this way, we defined our assumed leverage as the indicative leverage that TGE would have for a particular category, considering spend, how deep in the supply chain the potential risk was, and where there appeared to be strategic relationships for managing the category.



Figure 1 – TGE Supply chain hotspots with assumed leverage

The hotspot analysis identified the following supplier categories with indicative inherent modern slavery risks in our supply chain:

- property services, including cleaning and security
- print, packaging, and promotional materials
- fuel and oil
- workwear and personal protective equipment (PPE)
- travel and entertainment
- IT support services and hardware
- tyres
- indirect labour and recruitment, including subcontractors

We understand that we could also face modern slavery risks through our customer network by transporting or storing items produced using modern slavery. Our



Statement for the reporting period ended 31 March 2023 is made in accordance with the Act and therefore focuses on operational and supply chain risks.

5. Actions taken by TGE to assess and address risks

5.1 Policies and Governance

We are committed to the highest standards of ethical behaviour in the conduct of our business dealings.

We have in place a range of policies and practices that set the standard of behaviour expected of directors, employees, contractors, and third parties (where applicable).

A summary of the key policies relating to our management of modern slavery is set out below.

- <u>Anti-human Trafficking and Modern Slavery Policy</u> This policy sets out our respect for ethical labour practices and values and our zero-tolerance approach to any form of modern slavery in our operations and supply chain.
- <u>Anti-bribery and Corruption Policy</u>
 This policy sets out our zero tolerance of bribery and corruption and outlines the expectations of directors, employees and third parties to act in accordance with the highest standards of ethical behaviour and to not engage in, and actively prevent, all forms of bribery and corruption.
- <u>Diversity, Inclusion and Equal Employment Opportunity Policy</u> This policy sets out our commitment to creating and promoting a fair and inclusive workplace promoting diversity, inclusion and equal workforce participation.
- <u>Workplace Behaviours Policy</u> This policy set out the minimum standard of behaviours expected of employees and contractors.
- <u>Whistleblower Policy</u>

This policy sets out our commitment to identifying and addressing misconduct, including suspected or actual contraventions of human rights, and encourages the reporting of such conduct safety, securely and without fear of detriment. Throughout the reporting period, an independent hotline was available for the reporting of misconduct with processes in place for the investigation of those reports.

• <u>Health, Safety and Wellbeing Policy</u> This policy sets out our commitment to the health, safety, and wellbeing of our people, customers, and the communities in which we serve.



5.2 Employee Code of Conduct

In late 2022 we introduced our new TGE Code of Conduct which sets out the expected behaviours of our people, including in respect of human rights and modern slavery. The rules and standards outlined in the code serve as an "ethical compass" that guides all employees in their day-to-day work. There is no alternative to conducting our business in a responsible, fair, and ethically irreproachable way. This code will be on our intranet soon at which time all employees will be able to readily access.

5.3 Freedom of Association

We comply with our obligations under relevant industrial laws and instruments in relation to Freedom of Association in the workplace by ensuring that workers are free to become, or not become, members of industrial associations, are free to be represented, or not represented, by industrial associations, and are free to participate, or not participate, in lawful industrial activities.

5.4 Working Conditions

• <u>Remuneration and benefits</u>

We compensate our employees relative to local industry and labour market and minimum wage legislation and in accordance with terms of applicable enterprise bargaining agreements, where they exist. We pay workers in a timely manner and clearly convey the basis on which workers are being paid.

Working hours

We comply with all applicable local laws regarding working hours including overtime, rest breaks, and paid leave entitlement accruals.

• <u>Workplace Health & Safety</u>

The safety, health, and well-being of our Workers is of utmost importance. In adherence with our Workplace Health, Safety, and Wellbeing Policy, statutory regulations, and industry standards, we provide a work environment that is safe and conducive to good health, in order to preserve the health of employees, safeguard third parties and prevent accidents, injuries, and work-related illnesses.

In our offices, we have trained first aid attendees along with mental health first aiders to assist their colleagues. In addition to this, we have partnered with Sonder, Are U Okay, and Healthy Heads in Trucks and Sheds programs to assist our employees and share best practices in this space.

5.5 Diversity and Inclusion

We promote an inclusive work environment that values the diversity of our employees as confirmed in our Diversity Inclusion and Ethical Employment Opportunity Policy. We are committed to equal opportunity and reject any forms of discrimination or harassment based on gender, ethnic origin, nationality, social origin, religion, age,



disability, sexual orientation, identity, or any other characteristics protected by applicable law. In addition to this, we have an active Diversity and Equal Opportunity Policy. All rewards and recognition are based on our Performance Management Policy.

5.6 Supplier code of conduct

The TGE Supplier Code of Conduct ("Supplier Code") sets out the behaviours that TGE expects from suppliers. This includes TGE's expectation that our suppliers will act with respect and comply with all applicable employment and workplace laws and regulations, including labour and child labour laws.

The Supplier Code reserves TGE's right to audit suppliers and their operations. If a supplier fails to act consistently with the supplier code or specific contractual obligations, this may result in remedial action or termination of a contract.

5.7 Modern slavery gap assessment and roadmap

After completion of the supply chain hotspot analysis undertaken in 2022 and discussed above, the external consultant conducted a gap assessment focusing on TGE's current responses to modern slavery and reviewed all the policies and procedures available. In addition, they interviewed relevant stakeholders to understand their views.

In this assessment, Pillar Two evaluated our current response against 18 indicators broken down into five action areas:

- Policies and governance
- Identifying and assessing risks
- Integrating and acting on findings
- Tracking effectiveness and communicating progress
- Remediation

TGE concluded this assessment in early 2023 and came up with 40 recommendations altogether with 21 of them highlighted as priority actions. To address these gaps, TGE formed a Modern Slavery Working Group comprising all the relevant stakeholders within TGE.

We are now in the process of addressing these gaps in our three-year road map and the Working Group is responsible for the execution of this roadmap.

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Figure 2 - TGE MS risk management framework

5.8 ESG Due Diligence Assessment

TGE next developed a comprehensive ESG due diligence assessment consisting of modern slavery-related requirements to screen and evaluate potential and ongoing suppliers.

Our initial focus is on our tier-one high-risk suppliers identified as per the supply chain hotspot analysis, However, every new supplier or potential supplier must also submit their response and it will be evaluated.

The TGE modern slavery survey has been developed to identify specific supplierbased MS risks, especially for local suppliers. This will also collect relevant data to conduct the supplier risk assessment.

5.9 Contractor prequalification platform

TGE has introduced a contractor prequalification platform with the support of an external service provider, Avetta. We are in the process of onboarding all our existing contractors to this platform, which incorporates pre-qualification requirements in terms of modern slavery and human rights. This will be used as a platform to collect, evaluate, and respond to contractor-related modern slavery requirements. As of July 2023, 132 subcontractors were onboarded to the system.

5.10 Training and Awareness

As part of TGE's modern slavery risk assessment, we conducted an awareness-raising campaign for all relevant stakeholders within TGE covering Procurement, Legal, Sales and marketing, ESG, and other relevant functions. We are also frequently conducting



refresher training targeting relevant groups. Following the reporting period, we have trained 157 persons who are actively engaging in MS-related requirements.

TGE has developed an internal MS training module that is in the internal HR platform (Workday), and it can be accessed by every employee of the organization.

6. Effectiveness of actions being taken to assess and address modern slavery risks

We recognize the importance of assessing the effectiveness of our company's Anti-Modern Slavery actions.

This Modern Slavery Working Group will be integral in establishing our actions and monitoring their effectiveness. We have introduced qualitative and quantitative indicators to assess this performance.

The TGE Whistleblower Hotline, which is available 24/7, also offers a protected channel to employees who may use it to report compliance violations. Identification and management of non-compliance issues are essential to support us in implementing certain corporate governance principles and standards, specifically provisions on the fight against human rights violations, modern slavery, corruption, and criminal law.

7. Future program of work

As described above, TGE has created a 3-year Modern Slavery Road Map. We are committed to achieving this roadmap and strengthening our modern slavery risk management framework focusing on the areas below:

- prioritizing our actions to address the inherent modern slavery risks identified in our supply chain,
- developing and rolling out a modern slavery capacity-building program for our employees,
- Partner with relevant industry associations to share best practices and knowledge,
- Work and partner with national and international MS and human rights-related organisations. (UNGC)



8. Consultation and approval

This Statement was prepared in consultation with each reporting entity and the entities they own and control.

This Statement was approved by the Board of Australian Parcels Group Pty Ltd for the Australian Parcels Group (as the higher entity for the reporting entities within each group within the meaning of the Act):

DocuSigned by:

Christine Holgate Christine Holgate Director Australian Parcels Group

Date: 19/9/2023

DocuSigned by: Adrian Loader 2AD5E3036BBF4B8...

Adrian Loader Chair Australian Parcels Group

Date: 20/9/2023