# JAS Worldwide Inc. Australian Modern Slavery Statement

This statement is made pursuant to the requirements of the Australian Modern Slavery Act 2018 (Cth) (the "Act") by JAS Worldwide, Inc. ("JAS Worldwide"), for and on behalf of the following Australian affiliates and subsidiaries:

- 1. JAS Forwarding Worldwide Pty Limited (ACN 101573479); and
- 2. JAS Forwarding Worldwide WA Pty Limited (formerly W.D.M. (WA) Pty Ltd) (ACN 089 105 537)

together referred to as "JAS Australia" throughout this statement, to which the Act directly applies.

This statement describes steps taken by the JAS Australia during the year ended 31 December 2024, to mitigate the risk of modern slavery in JAS Australia's businesses and supply chains. This is JAS Australia's first Modern Slavery Statement under the Act. This statement is made in respect of the actions of the JAS Australia entities only and their statutory duties under the Act but encompasses some of the steps that JAS Worldwide and its subsidiary companies have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. JAS Worldwide consulted with the leadership teams of each of the JAS Australia entities in an open dialogue in the development of this statement.

Modern slavery and human trafficking are crimes and violations of fundamental human rights. They take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for commercial gain.

Whilst this statement deals primarily with the specific actions taken by JAS Australia, the entirety of JAS Worldwide stands and acts against modern slavery across the globe and in any form it takes.

## About JAS Australia

JAS Australia is part of a worldwide forwarding air/sea, warehouse & logistics, projects, and supply chain management provider, with global headquarters in Atlanta, Georgia, USA. We are an independent provider of cost-effective, lean and agile solutions, with a global footprint of approximately 274 JAS offices extending into 54 countries, covering our core markets worldwide. In 2024, JAS Worldwide had over 7,000 employees globally and an annual group turnover of over US\$3,000,000,000, and JAS Australia had over 160 employees within Australia, and an annual group turnover of over A\$120,000,000 in Australia.

Our capabilities include sea and air freight forwarding, warehousing, contract logistics, and supply chain management. This puts our organisation in contact with many other organisations throughout supply chains. The nature of our business exposes JAS Australia to the potential risk of interacting with modern slavery or human trafficking. We act to ensure that any suppliers or customers we contract with have stringent and effective policies in place to prevent modern slavery and human trafficking.

## **Our Policies**

One of our fundamental beliefs is that everyone has the right to work in a respectful and professional environment, which is free from any abusive or unprofessional conduct. Most of our workforce is employed directly on a permanent or fixed term basis. Our recruitment takes place through a combination of internal advertising and sourcing staff through reputable employment agencies who maintain the same high standards we do.

All new employees are screened to ensure they are genuine applicants operating as free agents with the required level of propriety. This includes verification of identity, references, evidence of qualifications, criminal and

financial checks. For the few roles in our business which are filled by contractors or agency workers, we ensure that similar checks are also undertaken.

Our commitment extends beyond our own organisation; in terms of working with our suppliers, to ensure that our supply chain organisations also ensure a fair and respectful workplace for all.

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We regularly review and update all our policies as necessary, and these are approved by the relevant Board of Directors for each JAS Australia entity.

JAS Worldwide has implemented the JAS Worldwide Code of Business Conduct and Ethics (the "Code") to introduce a uniform standard of business conduct across all JAS Worldwide entities and subsidiaries and reflects our commitment to acting ethically and with integrity in all of our business relationships. The Code sets out policies adopted to identify and combat human trafficking and forced labour which are applicable to all JAS Worldwide entities and employees.

In addition to following the Code, the JAS Australia entities each have in place:

- · We recently updated and amended our staff handbook which sets out all of our employment policies and procedures. It includes our expected standard of conduct which incorporates our anti-slavery policy and measures, and every employee hired signs a declaration when they join JAS Australia confirming their familiarity with our mandatory requirements.
- We have updated our Supplier Qualification / Evaluation questionnaire to include Modern Slavery and this is sent out to all our suppliers on an annual basis; and
- A whistleblowing policy and, as part of our efforts to identify and mitigate risks within our supply chain, and we are introducing systems to identify, assess and monitor potential risk areas.

JAS Australia employees have completed the mandatory online training courses, and as such is part of our on boarding process. Online training on modern slavery and forced labour will be provided with regular updates delivered through online training modules on an annual basis. This training is designed to provide updates on developments relating to modern slavery and educate staff on how they can formally raise awareness or report suspected cases of modern slavery through appropriate channels.

## **Our Suppliers**

Our relationship with our suppliers have been established over a number of years and has been built upon a mutually beneficial trust and relationship. We expect business partners to conduct all business with the same commitment as JAS Australia.

To ensure our suppliers comply with and meet our requirements, we operate a supplier validation and renewal policy which is reviewed annually and for which we ask our suppliers to provide a copy or link to their own Modern Slavery Statement which we then validate. A copy of the supplier's statement is retained against the Supplier records electronically.

Where our suppliers are not under a legal obligation to create and maintain a Modern Slavery Statement, we ask that they acknowledge and adhere to our Modern Slavery Statement which they can obtain on the JAS Australia website.

# **Due Diligence**

JAS Australia operates in a business and industry that exposes it to a potentially higher risk of coming into contact with situations of slavery and human trafficking. We understand that the use of recruitment agencies and third-party carriers gives rise to the highest modern slavery risk in our business.

As part of our initiative to identify and mitigate risk, JAS Australia:

- Identifies and assesses potential areas of risk when considering taking on new suppliers and regularly reviews existing supply chains.
- Where possible, build long-standing relationships with local suppliers and customers and make clear JAS Australia's expectations for business behaviour.
- Monitors potential risk areas in JAS Australia's supply chains.
- Has in place systems to encourage the reporting of concerns and the protection of whistle blowers.

# **Effective Action**

If any member of JAS Worldwide's staff suspects a violation of anti-trafficking, anti-slavery, or similar laws within JAS Worldwide, JAS Worldwide outlines a Compliance Procedure detailed in Section 21 of the Code. Staff are encouraged to report any concern related to this Statement and the Code, and the Act in confidence and without fear of retaliation.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- All recruitment agencies we use are vetted as new suppliers, and in cases where they are not obliged to publish a Modern Slavery Statement, JAS Australia asks that they acknowledge and adhere to our Modern Slavery Statement which can be obtained on the JAS Australia website a link to which is provided.
- We compile monthly business management system reports, and we have quarterly meetings to review all
  suppliers who are approved and to ensure that all relevant documents are valid and in date as per the
  supplier approval process.
- JAS Worldwide Employees are encouraged to report suspected violations of anti-trafficking, anti-slavery,
  or similar laws to their management, Human Resources, legal counsel, executive management, and/or to
  the Ethics Hotline in accordance with JAS Worldwide's Ethics Hotline Policy available on the JAS
  Worldwide intranet.

## Training

We operate a zero tolerance approach to slavery and human trafficking. To maintain awareness and ensure a high level of understanding of the risks of these acts in our business, our Anti-Slavery Policy is included in our Employee Handbook and this is reviewed annually to align with any legislative changes.

All new JAS Australia employees are provided with a copy of the Code and Employee Handbook and are required to acknowledge that they have read and understood the requirements placed on them. The Code and Employee Handbook are published and accessible to all staff through JAS Worldwide's and JAS Australia's intranet.

As noted above, JAS Australia also have a course on its online training platform aimed at bringing attention to human trafficking and servitude. It is a mandatory training for all JAS Australia team members conducting every 2 years. During 2024, more than 75 JAS Australia team members received ethical sourcing and modern slavery training.

JAS Australia is also actively promoting and encouraging our suppliers to provide related training to their employees. We would evaluate to add the training component as one of the mandatory requirements to be our approved suppliers.

# **Next Steps**

We are currently reviewing our Supply Chain protocols and will be implementing specific measures to ensure that our obligations under the Act are complied with throughout our supply chain. These measures will include:

- Continuing to identify and assess any key risk areas in our supply chains.
- Contacting all current critical suppliers to affirm our zero tolerance approach to human rights abuses and requesting details of their due diligence procedures both for internal compliance and within their own supply chains.
- Including a specific requirement in our procurement vetting process for prospective suppliers to disclose
  their position on modern slavery and human trafficking and provide their policies/statements or affirm
  JAS Australia's own statement.
- Implementing measures to track and audit key performance indicators on trainings and compliance by
  employees and suppliers with JAS Worldwide modern slavery and human trafficking policies to
  periodically report to JAS Australia executive leadership.

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and constitutes the slavery and human trafficking statement for the financial year ending 2024 for JAS Forwarding Worldwide Pty Limited (ACN 101 573 479) and JAS Forwarding Worldwide WA Pty Limited (formerly W.D.M. (WA) Pty Ltd) (ACN 089 105 537). This statement was approved by the Board of Directors (the principal governing body) for JAS Worldwide, Inc., on March 14, 2025.

Signed by

Mardo Rebuffi

Responsible member for and on behalf of

JAS Worldwide, Inc.