

Modern Slavery Statement

Correspondence Address:

C.H. Robinson
460 Bay Street | Port Melbourne
Australia | 3207
Tel: (03) 9644 7222
www.chrobinson.com

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C.H. Robinson Worldwide (Australia) Pty Limited FY2020

This statement covers the activities of C.H. Robinson Worldwide (Australia) Pty Limited (ACN 135 205 551) (**C.H. Robinson**) and its owned and controlled entities during the year ended 31 December 2020.

This is our first modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Board of C. H. Robinson on 21 June 2021.

About us

At C. H. Robinson, we recognise that respecting the human rights of those affected by our business activities is important. We have a long-standing history of recognising these rights by instilling high standards of ethics, respect and integrity at all levels of the organisation.

By leveraging our scope, size and scale, we work to ensure that every element of our business and our contractors' supply chains are scrutinised. We aim to exhibit ethics and integrity in all we do and hold each other accountable to the highest ethical standards.

We integrate social and environmental responsibilities into our business through our "EDGE" values of Evolving constantly, Delivering excellence, Growing together and Embracing integrity. C.H. Robinson upholds these values in all that we do as these values are critical to building trust and respect in our company, industry and with our employees, customers, carriers, vendors, and shareholders.

Our structure

C.H. Robinson is a company incorporated in Australia and our registered office is located at Level 6, 379 Kent Street, Sydney, NSW, 2000.

C.H. Robinson is a subsidiary of C.H. Robinson Worldwide, Inc, headquartered in Eden Prairie, Minnesota, United States of America. C.H. Robinson Worldwide, Inc and its subsidiaries conduct a diversified range of business

activities across freight transportation services and logistics solutions to companies of all sizes in a wide variety of industries.

C.H. Robinson itself has a number of owned and controlled entities, including C.H. Robinson Worldwide (AU) Pty Ltd and C.H. Robinson Trade Management Pty Ltd.

Our operations

C.H. Robinson Worldwide, Inc, is one of the largest third-party logistics companies in the world. C.H. Robinson Worldwide, Inc, was founded in 1905 and has grown to offer freight transportation services and logistics solutions to over 105,000 customers in North America, Europe, Asia, Oceania, and South America.

As a global logistics platform, we arrange the transport of our customers' freight and support supply chain optimization through data services. Industry classifications often label us as a transportation company; however, we are unique from many transportation companies, in that we are an asset-lite business and leverage a global network of logistics solutions via the management of a robust sub-contractor management plan.

C.H. Robinson is the world's largest logistics platform globally, with approximately \$20B USD in freight under management and facilitating 18M shipments annually. The Oceania Region (Australia and New Zealand) provides freight forwarding and logistics solutions for a range of critical sectors in Australia. We manage the second highest amount of TEUs (abbreviation for twenty-foot equivalent unit) between US & Oceania in Ocean Freight Volumes (~12,500 TEUs) and in 2019, we air freighted 11,375 million tonnes of goods for our Oceania customers. We employ 327 employees and engage 4 contractors across Australia, operating in 7 Offices (3 x Melbourne; Sydney, Brisbane, Adelaide and Perth). Our Oceania Regional Head Office is located in Melbourne.

Our supply chain

Globally, we enter into contractual relationships with a wide variety of transportation companies and utilize those relationships to efficiently and cost-effectively arrange the transport of our customers' freight. We work with approximately 73,000 of these contracted transportation companies, including contracted motor carriers, railroads (primarily intermodal service providers), and air and ocean carriers in a number of regions including in North America, Europe, Asia, Oceania, and South America.

On a regional front, our suppliers in Oceania are primarily located in Australia and New Zealand accounting for less than 1% of the total global supplier base. Most of our supplier contracts are negotiated locally, however, some preferred carrier suppliers are coordinated globally.

The main types of goods and services that we procure are shipping line carrier contracts; airline carrier contracts; and, domestic transport including wharf cartage transport and warehousing contracts. We do not own or operate the assets that transport our customers' goods but operate as a third-party supply chain agent.

We engage our suppliers with a view to creating long-standing supplier arrangements and manage these relationships via service contracts which outline the expectations on all stakeholders. Performance management meetings are conducted on a quarterly basis to ensure both parties are focussed on continuous improvement and working towards meeting the objectives and targets outlined in the service contract



As an example, in 2020/21, we have recently conducted wharf cartage supplier tenders in three States and awarded service contracts of 2 years (plus an option of an additional 1 year) in length. These new contracts were in accordance with our new supplier agreement, including modern slavery provisions.

We have one labour hire arrangement to provide warehouse labour at our Melbourne Airport facility where the engaged staff are expected to meet our direct employee standards for compliance and Code of Ethics (as described elsewhere).

We also have a number of indirect suppliers, including IT equipment, office supplies, cleaning services, travel & entertainment services. Where possible, we have engaged services of indigenous suppliers, in accordance with our Reconciliation Action Plan actions.



Modern slavery risks

Risk assessment methodology

As part of our engagement on modern slavery, we have focused our actions to consider our unique business model. In doing so, we developed a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk.

Our initial risk assessment has indicated that our operations and supply chain have a medium potential for modern slavery risks. Our risk profile is summarised in the table below.



Risk profile

Risk	Description of risk
Sector /Industry	The freight forwarding industry is LOW risk. Workers are primarily office-based, white collar workers with high school or university qualifications. All C.H. Robinson staff employed in Australia are above 18 years of age; must provide documentation of their valid work rights for Australia; and, are paid (at a minimum) in accordance with all legal minimum terms and conditions of employment.
Product / Service	C.H. Robinson procures carrier services (shipping lines, airlines) that service our customers internationally as well as domestic transport and warehousing services. The shipping line (maritime) industry is considered a HIGH risk industry given the source of labour can often be from geographies with different risk profiles to Australia ¹ .
Geographic	With a high proportion of our suppliers being sourced from within Australia, this represents a LOW risk of modern slavery ² . However, it is noted that shipping line and airline carriers may source labour from other geographies.
Specific Entity	We are not aware of any specific entities within our supply chain that have been subject to legal filings or publicity surrounding poor employment practices or poor human rights. LOW risk is attributed.
COVID 19 risks	Global supply chains have been heavily impacted by COVID-19. C. H. Robinson has provided critical support to our Australian customers to ensure their ongoing supply of goods into/out of Australia during the pandemic and therefore, have been deemed a critical sector. With airlines flying less due to border restrictions and shipping lines being impacted by routing changes, the flow-on affects for C.H. Robinson customers has been high. To the best of our knowledge, this significant impact has not created greater modern slavery risks to our supply chain, and we have continued to use a consistent supplier list before and during the pandemic.

Actions to assess and address risk

For us, compliance is more than just checking a box; it is crucial that our customers, contract carriers, vendors, and shareholders feel comfortable and confident doing business with us.

That is why during our first reporting period we introduced a number of steps to assess and address modern slavery in our operations and supply chains.

¹ <https://www.nortonrosefulbright.com/en/knowledge/publications/b87356e9/modern-slavery-and-human-trafficking-reporting-the-risks-of-modern-slavery-in-maritime-supply-chains>

² Australian Red Cross, "Addressing Modern Slavery: A Guide for Australian Businesses", <https://www.redcross.org.au/getmedia/49f34bf5-d438-4aa4-bd9e-d2412ff8b08a/Addressing-Modern-Slavery-Report-Final.pdf.aspx#:~:text=Modern%20slavery%20also%20occurs%20within,higher%20risk%20of%20forced%20labour.&text=The%20construction%20industry%20accounts%20for%2018%20per%20cent%20of%20labour%20exploitation%20cases.>



Governance and accountability framework

C.H. Robinson in Australia takes a cross-functional approach to regulatory compliance. In matters involving employment-related regulation, our Manager Human Resources, Oceania, partners with our Regional Customs & Compliance Manager to assess our response and develop our accountability frameworks. These two individuals have kept the regional Senior Leadership Team abreast of regulatory developments, any identified risks, and action plans to ensure C.H. Robinson's compliance. This team is also accountable for consulting across relevant internal stakeholders.

Policies and procedures

During FY2020 we introduced a number of policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks, including the introduction of a:

- **Modern Slavery Policy** for our business that establishes our commitment to addressing modern slavery risks in our business and driving an accountability for ethical business practices across our organisation. This Policy is embedded in the Australian Employee Handbook that is provided to all Australian employees and contractors on an annual basis for review and acknowledgement. This took place in July 2020 with 100% compliance.
- **Supplier Code of Conduct** that set out the minimum expectations for our suppliers and third party labour providers related to ethical practices including addressing modern slavery risks in their business, which was rolled out. Our approach was to embed the Supplier Code of Conduct into our existing Supplier Agreement. All new suppliers since the release of the updated Supplier Agreement have been required to sign this new format. For suppliers with existing agreements, we have requested a new contract be signed with the new clauses. At year end, we had completed 75% of contract re-signings and we plan to be 100% completed in FY2021. We have also established an expectation with our suppliers that they will engage with their suppliers on similar terms. We wish to work in partnership with our suppliers to address risks of modern slavery that exist in our suppliers.

These policies and procedures complement our existing governance framework which includes our Global Code of Ethics (reviewed and acknowledged by all staff annually); Foreign Corrupt Practices Act (FCPA) eLearning (undertaken annually); and, a dedicated external and confidential process for Code of Ethics incidents to be investigated.

Review of our standard sub-contractor agreements

We reviewed our standard subcontractor agreements and introduced a number of safeguards for modern slavery risks as described above. These terms allow us to work collaboratively with our sub-contractors to address modern slavery risks and proactively manage any incidents that may occur.

Training

In FY20, we have provided briefings to the regional Senior Leadership Team on the principles of modern slavery. In FY21, we will run information sessions across our product (procurement) teams and operations branch leadership teams on key principles of our modern slavery risk assessment and policy.



COVID-19

The COVID-19 pandemic has brought further challenges to modern slavery and highlighted social and economic inequalities worldwide. C.H. Robinson has assessed the impact of COVID-19 pandemic on its practices and risks to modern slavery.

Assessing our effectiveness

We are committed to reviewing the effectiveness of our actions by regularly reviewing our modern slavery processes with senior management to ensure we are appropriately identifying and evaluating our modern slavery risks. Further, we will complete our updated supplier contract re-signing and ensure when engaging new suppliers, the appropriate contracting and risk assessment is completed.

We will continue to measure our performance by monitoring the number of our suppliers who have committed to our Supplier Code of Conduct (100% is our Target) and will monitor the number of suspected or identified modern slavery incidents (0% in FY20).

Consultation

As a subsidiary of C.H. Robinson Worldwide, Inc, C. H. Robinson's approach to modern slavery is largely comprised of overarching policies, systems and processes that are designed to be consistently applied across the group.

During FY2020, there was consistent consultation and collaboration between regional Senior Leadership Team of C. H. Robinson Oceania and the Manager Human Resources, Oceania, partners with our Regional Customs & Compliance Manager. This process of consultation also included reviewing Modern Slavery Statements internationally, our competitors and our customers.

Prior to being put to the Board of C. H. Robinson for review and approval, this statement was reviewed by:

- The Oceania Region Senior Leadership Team
- C.H. Robinson Global Forwarding Legal Counsel
- Principal Marketing Manager, Oceania
- Global C.H. Robinson Vice President of ESG

Related activities

As an entity within a global business, across our network, C.H. Robinson is required to meet reporting requirements in California Transparency in Supply Chains Act of 2010 and the U.K. have the Modern Slavery Act of 2015.

Further, within North America, C.H. Robinson has supported initiatives such as Trucker Against Trafficking, as promoted on LinkedIn:





FY2021 focus

As this is our inaugural statement, we recognise the importance of modern slavery and the support we can provide to our customers to ensure the risks are assessed and addressed. We will continue this approach in FY2021 and develop further understanding and awareness across our Oceania region of C.H. Roberson.

This statement was approved by Andrew Coldrey being a member of the Board of C.H. Roberson Worldwide (Australia) Pty Ltd on 21 June, 2021.

Andrew Mark Coldrey
Vice President Oceania & Director
C.H. Roberson Worldwide (Australia) Pty Ltd

