

# AWH PTY LTD (ACN 069 066 842)

### **MODERN SLAVERY STATEMENT FY21-22**

#### 1. INTRODUCTION

This Modern Slavery Statement is provided by AWH Pty Ltd (ACN 069 066 842) for the financial year 1 July 2021 to 30 June 2022 (**Reporting Period**) pursuant to its obligations under the Modern Slavery Act 2018 (Cth).

Respect for human rights is fundamental to AWH. AWH remains committed to ensuring that people connected to its supply chain are treated with dignity and respect.

The purpose of this Statement is to outline our approach to ensuring we have robust frameworks and processes in place to minimise the risk of Modern Slavery in our operations and supply chains.

This is AWH's second Modern Slavery Statement in response to the Act and our focus during the Reporting Period and in the period leading up to the publication of this Statement has been to consolidate and build on the progress made during the prior period of 1 July 2020 to 30 June 2021.

## 2. OUR STRUCTURE& OPERATIONS

AWH is a private company, with two 50% shareholders -DP World Australia Ltd (ACN 129 842 093) and Landmark Wool Pty Ltd (ACN 076 744 619).

AWH is now Australia's largest wool and independent cotton handler as well as being one of Australia's leading general warehouse and specialist logistics providers, with a comprehensive capability in storage, handling, inventory management and domestic/international transport.

AWH has 390 employees across 15 locations throughout Australia and longstanding relationships with governments, shipping lines, importers, exporters, communities and others in the global supply chain.

AWH handles close to 1 million bales of wool annually. AWH also provides sale room services for the 3 national wool selling centres. When seasonal conditions allow, AWH also handles more than 1.2 million bales of cotton annually. AWH also provides import logistics services for the agricultural and building sectors.

## 3. SUPPLY CHAIN

AWH's supply chain predominantly consists of customers requiring storage and handling services. In addition, our supply chain includes the physical premises we occupy, facilities we use (photocopiers, office supplies, etc.), maintenance contracts, software licences and IT infrastructure.

# 4. OUR POSITION ON MODERN SLAVERY

AWH is committed to providing a safe workplace and to limiting the risk of modern slavery within its own business and supply chains. Our approach is overseen by the AWH Executive Leadership Team and the AWH Board of Directors.

We seek to partner with suppliers whose ethical principles align with our own. All proposed agreements are subject to a detailed legal and commercial review.



AWH places significant importance on its published Values and Beliefs:

**Respect:** We have respect for each other and all those we deal with.

**Integrity:** We act honestly and with the highest ethical standards.

**Accountability:** We take responsibility for our actions, performance and results.

**Reliability:** We are a trusted partner, with professional and reliable staff

who gives their best to provide high-quality service to meet

different customer needs.

**Courage:** We have the courage to challenge, to make change and to stand

up for what we believe is right.

**Continuous Improvement:** We challenge ourselves to find a better way.

#### 5. ASSESSMENT AND ADDRESSING OF RISK

#### 5.1. ASSESSMENT OF KEY RISKS

As a service provider whose workforce is employed solely in Australia, the risk of modern slavery within our direct business operations remains negligible.

We have assessed our work environment against practices that would constitute modern slavery and have ensured we have appropriate mitigation measures in place to avoid such practices. Details of the assessment are as follows:

Practices that Constitute Modern Slavery	Risk	Level of Risk	Mitigation Measures
Trafficking in Persons Slavery Servitude Forced Labour	Poor or unsafe working conditions  Excessive hours  Restriction of movement  Substandard accommodation  Withholding identity and travel documents	Very Low	Our warehouse workers are subject to a negotiated EBA, approved by Fairwork.  We comply with the National Employment Standards.  Detailed payslips are provided.  We engage a National Work Health Safety Advisor.  We have risk assessed the tasks undertaken in our business and have extensive safe operating procedures.  Employees are trained in safe work practices.  We have direct and frequent contact with our employees at all sites.  We do not retain identification papers.



			Employees are free to resign whenever they wish.  Hours of work are compliant with our EBA and are recorded through a clocking system. Clocking details cannot be manipulated so there is transparency around the hours worked at all sites.
Debt Bondage	Unauthorised payroll deductions, fees or debt recovery  Underpayment of wages	Very Low	We do not charge any fees to individuals for the sourcing of the employment opportunities they are offered.  We have a payroll policy which is underpinned by The Fair Work Act. We do not make any deductions from payroll without express employee consent, and only where legally permissible.  All payroll transactions are reviewed and approved prior to the release of payroll, to ensure they comply with the requirements of our Agreements.
The Worst Forms of Child Labour	Underage employees	Very Low	We do not employ anyone under the age of 16 years old and all employees are paid full adult wages. The legal ability to work is confirmed by obtaining the employee tax file declaration.
Deceptive Recruiting for Labour or Services	Deceptive or coercive recruiting  High risk industry.  Migrant or disadvantaged workers	Very Low	Every employee is provided with an employment contract which sets out the roles and responsibilities of their position, the rate of pay, hours to be worked and entitlements.  All warehouse staff are subject to a negotiated EBA, approved by Fairwork.

The risks of modern slavery have been further reduced following the ceasing of AWH's specialist freight forwarding division, AWH Global, during the Reporting Period. This business engaged in the import/export coordination and documentation. With this business having ceased, AWH's involvement with overseas entities has reduced significantly.

## 5.2. OTHER RISK MITIGATION MEASURES

We have a substantial suite of policies, procedures and guidelines to effectively manage supply chains. This includes:

**Modern Slavery Policy**: This policy sets out our approach to modern slavery and human trafficking both in our organisation and in relation to our suppliers and customers. The policy



also clarifies the steps that any individual can take if they have concerns about the existence of any such incidents. Our policy is reviewed annually.

**Whistleblowing Policy:** This policy outlines the methods by which a person can report suspected legal or human rights violations. All whistleblowers are protected from retaliation.

**Business Ethics & Conflict of Interest Policy:** This policy establishes general guidelines for ethical behaviour during employment with AWH.

**Contract Policy:** This policy establishes general guidelines which must be followed when negotiating and entering into a contract on behalf of AWH. The purpose of the policy is to ensure that all risks associated with entering into a contract are effectively managed on behalf of AWH.

**Delegation of Authority Policy:** This is the principal policy under which the AWH Board delegates authority to the management of the company at levels which are considered appropriate to enable management to fulfill its responsibilities lawfully, commercially and with respect to avoiding modern slavery in the supply chain of the business.

**Risk Management Policy:** Organisations face internal and external influences that make it uncertain as to whether, when and to what extent they will achieve their objectives. The objective of this policy is to provide a framework to manage risk effectively.

**Customer Corrective Action Request Policy:** The purpose of this policy is to set out the instructions by which non-conformities and possible non-conformities in the company's processes or services that impact on or have the potential to impact on customers are captured, consolidated, reported on and corrected in a consistent and transparent manner.

Other relevant policies include: Discrimination Policy; Employee Code of Conduct; Discipline Policy; Recruitment and Selection Policy.

# 6. SPECIFIC EFFORTS DURING THE REPORTING PERIOD

All business risks and policy compliance are monitored internally by key members of Executive Leadership Team (CEO; CFO; General Counsel; General Manager, HR & Safety). Non-financial risks including modern slavery, environmental and social sustainability risks are included.

During the Reporting Period:

- A review of all policies and contracts took place to ensure that, where appropriate, documents
  include provisions which address the issues of modern slavery, human trafficking and child/forced
  labour.
- Our Modern Slavery Policy was reviewed and revised as needed. This policy is available on our website and is made available to all of our suppliers.
- All new suppliers were required to complete our Modern Slavery Questionnaire prior to AWH obtaining the services of those suppliers.
- We also focused on raising awareness amongst our employees, workers and contractors to understand the requirements of the Modern Slavery Act 2018 and providing the tools to flag



potential issues. This included modern slavery training which we required all office staff to undertake. The training undertaken included the following topics:

- Introduction
- o Beyond our borders the supply chain
- o Modern slavery thrives under these circumstances
- Modern slavery takes many forms
- o Modern slavery legislation, standards, and safeguards
- How to identify modern slavery in your operations or supply chain
- Locations of suppliers
- Employee respect
- o Australian modern slavery reporting requirements
- o Australia's Modern Slavery Register
- o The importance of remediation processes and due diligence
- Positive action
- O What to do if you suspect slavery?

This statement has been approved by AWH Pty Ltd's Board of Directors.

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**Jonathon White** 

**Chairman of the Board** 

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**AWH PTY LTD** 

Dated: 18/12/2022 | 4:23 PM PST