

# Modern Slavery Statement

December 2024

*Submitted and Awaiting Approval by Australian  
Government's online Modern Slavery Statements Register*





# Reporting Entities & Consultation

This joint statement is in accordance with the Modern Slavery Act 2018 (*cth*) and has been prepared in consultation with the following entities:

- Black Diamond Administration Services Pty Ltd
- Yellow Diamond Administration Services Pty Ltd
- Fleets Flyers Pty Ltd
- Courier Metro Services Pty Ltd
- Contract Logistic Services Pty Ltd
- B2C Delivers Pty Ltd
- Courier National Services Pty Ltd
- Courier Contract Services Pty Ltd
- SDNT Pty Ltd

## Introduction

This statement has been made by **Fleets Flyers Pty Limited** ABN 41 008 417 016 trading as ANC, in accordance with the Modern Slavery Act 2018 (*cth*). This is our third annual statement regarding modern slavery to fulfil our obligations in respect to the Modern Slavery Act 2018 (*cth*).



# About ANC

ANC is the last mile delivery partner for many of Australia's leading brands. ANC is a privately-owned Australian company, our organisational structure consists of a Board of Directors, an executive leadership team, 200+ employees distributed nationally with a team of 1,000+ contracted delivery professionals across Australia and 50+ support staff in the Philippines.

ANC engages a fleet of 1000+ contractors with commercial vehicles servicing metropolitan Australia with utes, vans, Pantechs, tautliners, crane trucks, flat tops, semis and electric vehicles making 25,000+ deliveries a day, 7-days a week. On occasion, we engage contractors through what we call Outside Hire organisations. We also engage a team of personnel through third-party, Business Process Outsourcing (BPO) organisations in the Philippines, who perform customer service activities on behalf of ANC.

Our DNA of innovation, adaption and reinvention has helped us sustain and grow our business for over 100 years. We are a national business delivering outcomes in ever-expanding ways, taking on challenges to meet customer and consumer expectations, and supporting our delivery agents and people be successful.

We believe in being sustainable and green. We seek opportunities to not only minimise our carbon footprint but also to offer solutions that help our customers and consumers reduce theirs. We currently operate several electric vehicles and have a national strategy to move at scale in the implementation of zero emissions and sustainable delivery to customers.

Diversity is our key strength, and we actively seek people from all backgrounds to help build a future where everyone and everything can move successfully.

Our clients are the businesses we serve and contracted to provide last mile solutions to meet their business and customer objectives. Our customers are our clients' customers, and they are the people we seek to satisfy every day.



# Our business is diverse, scalable, and Australia-wide



**Large fleet, last  
mile focused**



**Commitment to  
sustainability**



**Diversity is our  
superpower**



**Rich history,  
national footprint**





# Our Purpose is...

To unlock the **full potential** of a purchase by fulfilling the promise **to the customer**.



Last mile solutions for clients with **mixed & complex freight** where value is created through **exceptional customer outcomes**.



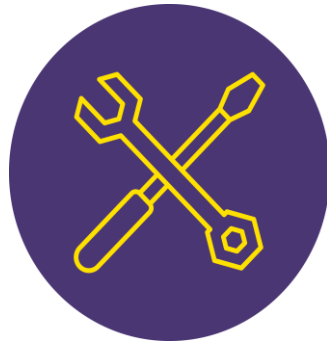
We help our Clients increase their sales, expand their customer base and grow their business by generating exceptional outcomes for their **customers**.



# Our Operations & Our Supply Chain



**Delivery**



**Install & Assembly**



**Brand carry & Promotion**



**Recycling & Return Services**

ANC's supply chain involves working with a number of large Australian and global clients providing professional last mile delivery services into homes, offices and worksites including construction, corporate, medical and education facilities. As part of our integrated delivery service, we provide 'complex deliveries' such as installation, assembly and removal of old comparable goods.

Our supply chain relies on a team of contractor owner drivers (Delivery Professionals) who operate their own assets to safely complete the delivery services.

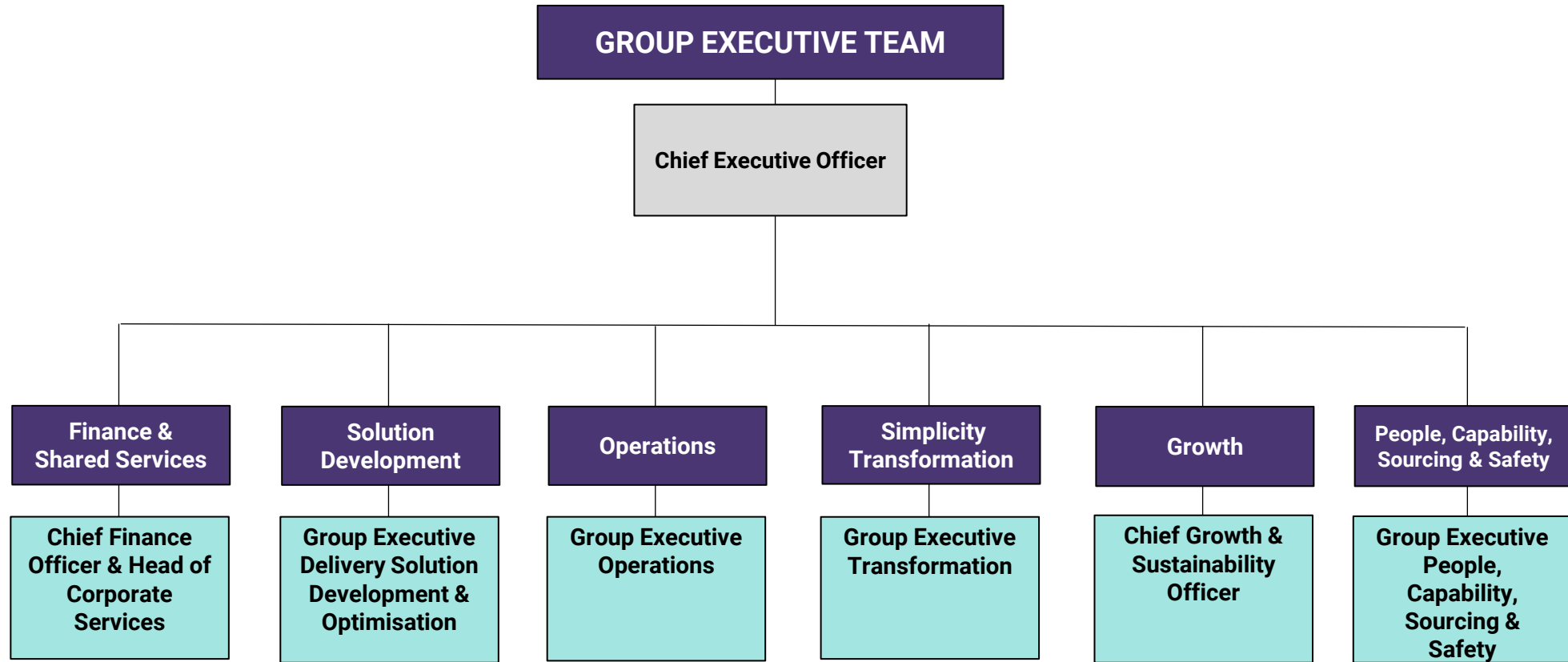
Our supply chain relies on integration and collaboration to ensure safe and seamless delivery outcomes. Throughout our supply chain ANC is committed to assessing and reducing all risks of modern slavery within our business and throughout our supply chain.

According to the **Global Slavery Index (2018)**, cases of forced labour exploitation in Australia predominantly occur in industries considered at risk, including agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food services.

Whilst ANC does not operate in these areas identified as high risk, we understand that there is still a possibility of modern slavery occurring within our supply chain and we must take appropriate actions to mitigate these risks.



# ANC's Executive Leadership Team



# Principles propel our culture



## Spark the change you want

Everyone is empowered to intervene, improve and simplify. Continuous improvement is a shared responsibility, action is an independent one.



## Own your decisions, own your results

Focus on results and make timely decisions to deliver them. Don't be afraid to stretch and occasionally make mistakes but commit to learning and moving forward at pace.



## Diversity makes us stronger

Diversity is our superpower, it is essential to our growth and creativity. We seek out diversity in ideas, identity, ethnicity and experience.



## Simplicity & technology sit at the centre

We know complexity is the enemy, so we build simple ways to work. Our technology reflects that simple way and helps us make great decisions. It is our tool of trade.



## Exceptional people, exceptional teams

Work hard to find, hire, develop and support exceptional people, never settle. Play as a team and put what's right for the team first, because that's best for all of us.



## Focus on the customer and all else will follow

Clients and their customers are our lifeblood. Striving to meet the promise made to customer comes first, for everyone.





# Our commitment to preventing Modern Slavery

## Overview of modern slavery

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour

Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. These practices are also harmful and may be present in some situations of modern slavery.

Modern slavery can occur in every industry and sector and has severe consequences for victims. Entities have a responsibility to respect human rights in their operations and supply chains, as outlined in the [United Nations Guiding Principles on Business and Human Rights](#). This includes taking steps to assess and address modern slavery risks. Entities that take action to combat modern slavery in their operations and supply chains can protect against possible business harm and improve the integrity and quality of their supply chains.

## ANC's commitment to preventing modern slavery

Preventing modern slavery occurring within ANC is key to our commitment to social responsibility and sustainability. In accordance with the Modern Slavery Act 2018 (*cth*) ANC is committed to upholding the protection of human rights. We are committed to ensuring that we are not complicit in any human rights violations and hold our suppliers and partners to this same exacting standard.

This statement outlines the steps that ANC has taken, and will continue to take, to assess and reduce risks of modern slavery within our business and throughout our supply chain.



**Preventing modern  
slavery  
occurring within  
ANC is key to our  
commitment to  
social responsibility  
and sustainability**

**anc**

Client		ANC	
TO		BEN LIA 9 ROSE STREET LEAWOOD GARDENS	
QTY	1	SA	5150
WEIGHT	15kg	EXP	1
DIMENSIONS		EXP	



# Corporate Governance

At ANC we have a number of policies that outline the ethical standards in which all employees, contractors and our clients are expected to operate, everything we do is measured against these important guides.

ANC is committed to the highest standards of conduct and ethical behaviour in all our business activities, and we promote and support a culture of honest and ethical behaviour, corporate compliance, and good corporate governance.

- ANC Modern Slavery Policy
- ANC Human Rights Policy
- ANC Code of Ethics Policy
- ANC Young Worker Employment Procedure
- Suspected Child Labour Violation Procedure and Handling Routine
- ANC Whistleblowing Policy
- Independent Contractor Code of Conduct
- Anti-Discrimination, Harassment and Bullying Policy
- ANC Sexual Harassment Policy
- ANC Whistleblowing Support Guide (*new Policy implemented in 2024*)
- ANC Diversity & Inclusion Policy (*new Policy implemented in 2024*)
- ANC Psychological Safety Policy (*new Policy implemented in 2024*)
- ANC Right to Disconnect Policy (*new Policy implemented in 2024*)
- ANC Bullying, Discrimination and Harassment Prevention (*annual compliance training*)

## Reporting unlawful and unethical conduct

Reports of unlawful conduct are responded to in accordance with the **ANC Whistle-blower Policy**. To receive protection of any disclosure under this Policy an Eligible Person must make their disclosure to a Disclosing Officer. A discloser may also elect to make a report anonymously. ANC will respect the discloser's right to not identify themselves. This has also been included in our **Modern Slavery Policy**.

ANC encourages the disclosure of any instances of suspected unethical, illegal, fraudulent, or undesirable conduct involving ANC's business, and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage, or reprisal.







**ANC is committed  
to the highest  
standards of  
conduct and  
ethical behaviour  
in all our business  
activities**





# Identifying Potential Risks of Modern Slavery in our Supply Chain

Identified Potential Risks of Modern Slavery	
Local / Domestic (Australia)	International
<ul style="list-style-type: none"><li>• Delivery Professional, contractor workforce engaging the services of their employees which includes migrant workers.</li><li>• Outsourced local logistics</li><li>• Electrical vehicles purchased by our contractor fleet via partnered suppliers</li><li>• Procurement of high-risk services (cleaning services)</li></ul>	<ul style="list-style-type: none"><li>• Procurement of products from high-risk countries such as Uniforms.</li><li>• Use of third-party labour companies to supply foreign labour from overseas.</li></ul>

We have conducted a risk assessment of modern slavery risks within our operations and supply chains.

Whilst we have implemented controls to reduce the risk of modern slavery, the risk assessment has identified our areas of potential risk (see table) which includes engagement of migrant workers through our contracting arrangements, outsourcing through local logistics companies, cleaning services, use of third-party labour companies to provide foreign labour, the electrical vehicles purchased by our contractor fleet via partnered suppliers and the procurement of uniforms from high-risk countries.



**In June 2024, ANC  
launched Project  
Spark – an ambitious  
programme to roll-  
out Australia's  
largest zero  
emissions fleet**







## Delivering more sustainable smiles for the next generation

In 2020, 38% of Australia's transport-related CO2 emissions came from light and heavy commercial vehicles, equating to 35.7m tonnes.

ANC's primary focus is on the easy-to-abate segments, particularly those involving distances below 250km, where significant direct impact can be made well ahead of 2030 or Paris Agreement targets. We believe we have both an opportunity and an obligation to lead the charge towards a more sustainable last mile by working with clients and partners to increase green fleet deployment today.





# ANC announces \$12.8m ARENA funding for Project Spark

In 2024, ANC announced a significant new funding agreement with the Australian Renewable Energy Agency (ARENA) to further accelerate the electrification of our delivery fleet.

ANC's Last Mile Delivery Vehicle Electrification Project has received funding from the Australian Renewable Energy Agency as part of ARENA's Driving the Nation Program – an ongoing initiative aimed at enabling the deployment of new zero emissions vehicle technologies.

Over the next two years, ANC will spearhead the deployment and operation of 112 electric vehicles and charging stations across Australia, making significant progress towards our goal of electrifying 30% of our last mile delivery fleet by 2028.

The ARENA funding gives clients a unique opportunity to implement zero emissions fleet with a moderated cost of implementation i.e., reduced total cost of ownership gap.

We're excited to be working with ARENA, and we're proud to be leading the charge towards a more sustainable last mile for the next generation of Australians.

112

EVs to be  
added by 2026

30%

EVs in fleet  
by 2028





# ARENA



Australian Government  
Australian Renewable  
Energy Agency





# Addressing Modern Slavery Risks

- We have reviewed our existing supply chain using a risk assessment that considers the likelihood of a Human Rights breach (nature of the supplier business), and the level of business involvement (how much we utilise a particular supplier).
- We implemented the **ANC Modern Slavery Policy** endorsed by the Executive Leadership Team (ELT).
- We have provided Modern Slavery Awareness training by educating our senior leaders to ensure that they are equipped with the knowledge and understanding of what constitutes modern slavery and the reporting process of any suspected breaches of the ANC Modern Slavery Policy.
- We have conducted an annual review of our broader company policies to ensure that they align with the Modern Slavery Act 2018 (cth).
- We have established an ANC Modern Slavery Working Group.
- The ANC Modern Slavery Working Group have continued to meet to address our actions.
- We have introduced appropriate steps to confirm awareness and alignment of new suppliers to our commitment against modern slavery globally by conducting a review of if our “priority” suppliers have a Modern Slavery Statement.
- We have presented progress on actions and outcomes to the Executive Leadership Team for review with updates provided in our Modern Slavery Statement.
- We have the **ANC Young Worker Employment Procedure** for any workers under the age of 18 years old. Young workers are considered ‘vulnerable’ workers, and may pose a higher risk, therefore this procedure ensures that young workers understand the following;
  - They must be paid in accordance with the relevant award
  - They must be provided with suitable working conditions
  - They are aware of ANC’s policies and procedures
  - They are aware of the minimum entitlements under the relevant award such as penalties, and leave entitlements
  - Young Workers are also assigned with a key contact within the business should they have any questions relating to their pay, entitlements or working conditions
- We also have a **Suspected Child Labour Violation Procedure and Handling Routine** to outline the complaints handling process should we receive a complaint in relation to the **ANC Young Worker Employment Procedure**
- We have trained members of our sourcing team on the **ANC Young Worker Employment Procedure**.



# Addressing Modern Slavery Risks

- We have reviewed our Independent Contractor Agreements to include the requirement to comply with the modern slavery legislation.
- We instituted a reporting process for breaches of modern slavery utilising the **ANC Whistle-blowing Policy**.
- ANC have continued to conduct periodic annual reviews of our broader company policies to ensure that they continue to align with the Modern Slavery Act 2018 (cth).
- We have continued to educate our people, in office and in field, to ensure that they are equipped with the knowledge and understanding of what constitutes modern slavery and the reporting process of any suspected breaches of the ANC Modern Slavery Policy.
- We have reviewed relevant suppliers and their commitment against modern slavery globally by conducting a review of priority suppliers to determine if they have a Modern Slavery Statement.
- We have introduced a **Modern Slavery Supplier Questionnaire** and issued to priority suppliers that do not currently have a modern slavery statement.
- We have taken the opportunity to update relevant supplier contracts to include their commitments to mitigate and address modern slavery within their own business and their supply chains.



## Further actions we have taken in 2024 to address Modern Slavery Risks

### Modern Slavery Actions

Modern Slavery Awareness Training

New and updated Company Policies

Continued Supplier Compliance & Due Diligence

Commenced the Fleet Audit Process

Third party labour supplier contract compliance



# Explaining our Modern Slavery Actions for 2024

- **Modern Slavery Awareness Training**, ANC has developed its very first Online Modern Slavery Awareness Training Module which will now be a bi-annual requirement for completion for our workforce. The training module outlines what modern slavery is, including the various forms of modern slavery, what the signs of modern slavery are, our ongoing commitment to mitigate modern slavery and what to do in the event of a risk being identified and the ways that modern slavery can be reported. The e-learning module for our workforce will be renewed every 2 years and will be included as part of the ANC's induction and onboarding process.
- **New & Updated Policies**, ANC is committed to the highest standards of conduct, ethical behaviour and corporate governance. As such we have revised and implemented new policies in 2024. We have revised our Modern Slavery Policy, and our Whistleblowing Policy, we have also implemented a new Whistleblowing Support Guide to assist with clarity and understanding of the Whistleblowing Policy. We have developed our Psychological Safety Policy and conducted an externally hosted Psychosocial Hazards Survey. We have also commenced taking actions as a result of the Survey outcomes. In 2024, we also implemented our Diversity & Inclusion Policy and our Right to Disconnect Policy. Our policies are communicated and made available to all of our workforce participants.
- **Continued Supplier Compliance & Due Diligence**, We have continued to conduct our Modern Slavery Risk Assessment as part of our supplier prequalification process. We have requested each supplier to complete a Supplier Questionnaire which includes various questions on Modern Slavery governance; requesting copies of Modern Slavery documentation including Modern Slavery policies, Statements or equivalent.
- We have also continued to work with our potential risk suppliers to assess whether their modern slavery risk controls are adequate and also where contracts have been initiated or renewed, we have included a modern slavery clause within those contracts. Additionally, as part of our Australian Renewable Energy Agency (ARENA) funding initiative to electrify our delivery, we have incorporated a modern slavery clause into all supplier contracts.
- **Fleet Audit process**, we are dedicated to preventing and mitigating modern slavery occurring within our operations, therefore in 2024 we have initiated an audit process for a portion of our independent contractor fleet and their employees. The Audit verified the age of workers, their working rights, the rates of pay, pay slips and working hours to ensure compliance with legal standards, fair pay and conditions.
- **Third Party Labour Supplier Contracts**, We engage a team of personnel through third-party Business Process Outsourcing (BPO) organisations in the Philippines, who perform customer service activities on behalf of ANC. We have taken the opportunity to ensure that the contracts related to these labour suppliers are updated with their commitment to prevent modern slavery occurring within their operations. One of our major labour supplier contracts has been renewed with modern slavery clauses and the additional contract renewal is currently in progress.



# Assessing the effectiveness of our actions

- Our Modern Slavery Working Group is fundamental in ensuring effectiveness of our actions in line with our modern slavery commitment.
- Our Modern Slavery working Group allows focused planning and mutual accountability. For example, sharing information on a regular basis on our progress. We also discuss our actions, and our proactive measures are approved by the group.
- Our Modern Slavery Working Group will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions, outcomes, and undertaking regular internal governance processes.
- Modern Slavery has been included in our Enterprise Risk Register.
- Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.
- We have regularly briefed relevant leaders and executives and reported on relevant actions with updates provided in subsequent Modern Slavery Statements.



# What we will continue to do to address Modern Slavery

The Modern Slavery Working Group will continue to meet and address our actions, priorities, tracking progress and effectiveness.

We will continue to reinforce and embed the mitigation of Modern Slavery risks within our operations including within our contractor fleet, such as conducting auditing processes and other relevant measures.

Our workforce will conduct Modern Slavery Awareness training on a bi-annual basis, to continue to improve ongoing awareness and education.

We will continue to conduct our Modern Slavery Risk Assessment as part of our new supplier prequalification process and look at ways to improve on our current supplier assessment processes.

We will continue to work with our potential risk suppliers to assess whether their Modern Slavery risk controls are adequate.

We will continue to conduct an annual review of relevant company policies in line with the Modern Slavery Act 2018.





This Modern Slavery Statement is made by ANC and has been approved by the Board of Directors.



Joe Sofra  
**Chief Executive Officer**

23 December 2024  
**Date**



James Taylor  
**Director**

23 December 2024  
**Date**



**anc**

