

OUR COMMITMENT

AirRoad Group is committed to responsibly identifying, assessing, and addressing the risks of modern slavery within our operations and supply chain. We continuously strive to strengthen our processes to ensure appropriate action is taken—where required—to prevent and mitigate any potential instances of modern slavery connected to our business activities.

This commitment reflects the core vision and values of AirRoad, which promote equal opportunity, respect, and integrity in all aspects of our work and partnerships.

1. INTRODUCTION

AirRoad has a zero-tolerance for any instance of slavery and trafficking throughout its operations and supply chains. We are committed to improving our practices to combat modern slavery and working with suppliers that are ethical and do not contribute towards slavery, human trafficking, child labour or human rights abuse.

AirRoad also values the health and safety of its workers and is committed to providing a safe workplace.

This Statement provides a framework to ensure that AirRoad, its workers and suppliers act in accordance with their obligations under applicable Modern Slavery legislation and uphold AirRoad's zero-tolerance approach to modern slavery.

2. THE REPORTING ENTITY

The reporting entity for the purposes of this modern slavery statement (**Statement**) is AirRoad Group (**AirRoad** or **Group**) of companies. This Statement has been prepared for the financial year ending 31 December 2024 in accordance with AirRoad's obligations under the *Modern Slavery Act 2018* (Cth).

The parent company of AirRoad is AirRoad Pty Limited (ABN 81 002 955 419) of 31 Nyrang Street, Lidcombe NSW 2141. As of 31 July 2025, Senko Group Holding co. Ltd, Japan is the sole shareholder of AirRoad Pty Ltd. The companies within the Group include:

- AirRoad Logistics (ABN 87 071 577 485) of 31 Nyrang Street, Lidcombe NSW 2141
- AirRoad Direct (ABN 46 090 829 333) of 31 Nyrang Street, Lidcombe NSW 2141;
- AirRoad Specialised (ABN 17 117 585 565) of 31 Nyrang Street, Lidcombe NSW 2141 and
- M&M Thorpe Transport Services (99 089 681 498) of 31 Nyrang Street, Lidcombe NSW 2141.

AirRoad is committed to ensuring that all parties involved in its supply chain are aware of its modern slavery risks and take active steps to mitigate such risks. AirRoad has consulted key personnel from our Quality, Human Resources (HR), Safety, Finance and Operations teams to prepare this statement. The consultation process involved conducting risk assessments for key areas within the business, as well as establishing expectations and standards of behaviour for AirRoad's core suppliers. AirRoad's Senior Leadership Team (SLT) has been briefed on modern slavery risks as well as actions to reduce and eliminate those risks. AirRoad's Board of Directors has reviewed and approved this response.

3. OBJECTIVES

Beyond legislative compliance, AirRoad is committed to identifying, preventing and addressing slavery risks both internally, for example, by training staff to source all materials ethically, and externally, by working with our suppliers. AirRoad plans to accomplish this through both due diligence and mitigation processes.

AirRoad recognises that a commitment to zero-tolerance for slavery may extend beyond monitoring suppliers and will, at times, require collaboration with suppliers to ensure that the goods and services they provide are not contributing to slavery and human trafficking. If the Group identifies instances of non-conformance, we will work with our suppliers to eliminate risks as much as possible.

4. THE GROUP'S STRUCTURE AND OPERATIONS

AirRoad provides premium express road transport and supply chain services throughout Australia. The Group has an annual consolidated revenue of over \$150 million per annum and has over 500 employees and contractors.

AirRoad provides premium services in national road freight distribution, express and specialised transport and supply chain management to blue-chip clients:

- **AirRoad Logistics (ABN 87 071 577 485)**
AirRoad Logistics is committed to delivering operational excellence to clients who value reliability, transparency, and tailored service. Our goal is to act as an extension of our clients' businesses, with our dedicated team providing the same high standards they strive for themselves. We approach every partnership with flexibility and immersion, customising our solutions to meet each client's unique needs. As a comprehensive third-party logistics (3PL) provider, we offer end-to-end services—from freight forwarding and contract warehousing to last-mile delivery and reverse logistics—making us a true one-stop shop for logistics solutions.
- **AirRoad Specialised (ABN 17 117 585 565)**
AirRoad Specialised provide expert management of deliveries of sensitive freight that requires project management. Clients trust us with their medical equipment, large format printers, multifunction devices, electronic goods and other fragile cargo requiring special handling. AirRoad Specialised have a fleet of dedicated vehicles in every major capital city and a team of professional so clients have total peace of mind knowing deliveries are in good hands.
- **M&M Thorpe Transport Services (99 089 681 498)**
M&M Thorpe Transport Services provides reliable long haul transport services across Australia, ensuring timely and secure delivery of goods over interstate and regional routes. With a modern fleet and experienced drivers, we specialise in moving freight efficiently across long distances, supporting businesses that demand consistency, transparency, and operational excellence. Our transport solutions are tailored to meet diverse industry needs, backed by real-time tracking and a commitment to safety and compliance.
- **AirRoad Direct Pty Ltd (ABN 46 090 829 333)**
AirRoad Direct provides express road freight delivery service. Clients are not required to have an account to use AirRoad Direct, delivering goods using the AirRoad delivery network. AirRoad Direct specialises in interstate courier deliveries for small and family-owned businesses.

AirRoad’s mission is to be the express transportation and logistics service provider of choice to the Australian market and has been providing this service since 1989.

AirRoad has depots in Sydney, Melbourne, Brisbane, Perth and Adelaide and utilises a combination of permanent employees, labour hire contractors and subcontractor drivers to provide its services to customers.

Below is a breakdown of AirRoad’s employees and contractors across Australia:

Location	Employees	Subcontractors
Sydney	190	44
Melbourne	147	35
Brisbane	76	10
Perth	33	15
Adelaide	6	0

5. OUR SUPPLY CHAINS

Our direct supply chain consists of goods and services provided by more than 100 suppliers which whom AirRoad has formal agreements, which support our provision of products and services, facilities, events and functions. Our supply chains include:

- Local delivery subcontractors – many of whom have been engaged long term.
- Equipment servicing and maintenance providers, such as heavy vehicle servicing, trailer and curtain repairs, forklift and conveyor maintenance.
- Labour hire providers, which are selected based on the criteria listed in item 8.
- Outside hire delivery drivers – only used when volumes exceed what can be managed by the standing subcontractor fleet.
- Cleaning contractors.
- Inter and intrastate delivery agents, many of which have a long-term relationship with AirRoad.
- Property maintenance providers, including gardening services, fire system maintenance, electrical and plumbing works.
- Providers of general office equipment and supplies, such as printing and stationary supplies.
- Suppliers of professional services including lawyers, accountants and tax/insurance advisors.
- Suppliers of IT hardware, telecom/internet and cloud services.
- Training organisations.

6. THE RISKS OF MODERN SLAVERY IN OUR OPERATIONS & SUPPLY CHAINS

As part of our compliance with the *Modern Slavery Act 2018* (Cth), AirRoad has identified areas within the Group's operations and supply chains which could be at risk of modern slavery practices.

The nature and context of these risks, as well as the specific risk management strategies implemented by the Group to address them, are set out **below** in the table at **item 8**.

7. ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY

(A) POLICIES ON SLAVERY

AirRoad is committed to ensuring that there is no modern slavery in its supply chains or in any part of its business. AirRoad currently has the following policies in place which reflect our commitment to acting ethically and with integrity in all our business relationships and to ensuring that our staff, suppliers and customers are treated with dignity and respect:

- AR-QP-0011 – Environmental policy
- AR-HR-QP-1052 - Employee Code of Conduct
- AR-SS-QP-8000 – AirRoad Workplace Health and Safety Policy and Procedure
- AR-HR-QP-1002 – EEO Discrimination, Harassment and Bullying Procedure and Statement
- AR-HR-QP-1082 – Whistleblower policy and procedure

In addition, AirRoad's values and ethical standards for doing business are specified in our mission statement which is publicly available on our website [here](#).

AirRoad has established a supplier Code of Conduct (AR-QP-0012) (**Supplier Code**) which all AirRoad's suppliers and contractors must comply with. Among other things, the Supplier Code requires that forced, bonded, indentured, involuntary or slave labour must not be used. Suppliers must also not engage their workers under terms which conflict with legal working conditions.

If a Supplier is suspected of contravening the AirRoad Supplier Code of Conduct, AirRoad may cease to engage the Supplier.

AirRoad is certified for Quality Management Systems ISO9001. Part of this is the Risk Management framework which is the totality of systems, structures, policies and processes in place to identify, assess, mitigate and monitor internal and external sources of risk that could have a material impact on AirRoad's operations. Responsibility for implementing the risk management framework and managing AirRoad's risk resides with the Executive team and other identified 'risk owners'. The National Quality Manager prepares a monthly report to the Board of Directors. Risk mitigation plans, in respect of modern slavery risks, will form part of the risk management plan and it is intended that these plans and actions in relation to improving our management of modern slavery risks will be periodically reviewed by the Board as part of their oversight of AirRoad's risk management activities.

(B) PROCESSES TO ENSURE SUPPLIER ADHERENCE TO OUR VALUES

AirRoad seeks to only work with suppliers and other business partners who respect human rights.

As part of our commitment to ensuring that our suppliers comply with our values and zero tolerance approach to modern slavery, AirRoad has in place the following:

- A requirement that AirRoad's suppliers must complete their own statement every 12 months (or as otherwise agreed between AirRoad and a particular supplier) assuring AirRoad that they are taking all reasonable steps to reduce the risk of modern slavery practices in their own supply chains and operations.
- Local Subcontractor delivery drivers are required to sign the AirRoad Subcontractor Contract every two years which contain specific clauses on Modern Slavery.
- For other supplier types a copy of AirRoad's Modern Slavery Statement for Suppliers (AR-HR-QP-1083), which is **attached** at Schedule A;
- Processes for ensuring that our suppliers and contractors can legally work in Australia - these are detailed in the table at **item 8 below**.

(C) ANONYMOUS REPORTING MECHANISM

AirRoad has made the Whistleblower reporting mechanism available on the public website as well as internally through the Intranet and paper copies of the policy on each site. This allows all workers to report issues or concerns securely and anonymously, without fear of repercussion. Nominated appropriate managers within AirRoad have the facility to respond to reports.

(D) DUE DILIGENCE PROCESSES FOR MODERN SLAVERY RISK AREAS

In addition to the steps mentioned at (A), (B) and (C) above, AirRoad has a due diligence processes in place (detailed in the below table) to mitigate and monitor identified modern slavery risk areas in its business and supply chains.

8. RISK AREAS AND ACTIONS TAKEN TO ASSESS AND ADDRESS THOSE RISKS

Risk area	Description of risk	Process to ensure workers are in Australia legally.	Process to ensure workers can legally work in Australia.	Award or Enterprise Bargaining Agreement payment structure used.	Risk level (High, Medium, Low)	Actions taken to assess and address risks
AirRoad employees	Workers may not always be completely truthful and forthcoming about work status and potential restrictions. Independent due diligence completed. Wages may not be aligned to the work they do.	Visa checks completed through MakeSure and/or Human Resources department (HR) during application process. HR also undertakes monthly checks of all workers who have restrictions.	Visa checks completed.	<ul style="list-style-type: none"> Federal National Employment Standards (NES). Road Transport and Distribution Award 2020 Clerks – Private Sector Award 2020 Road Transport (Long Distance Operations) Award 2020 Manufacturing and Associated Industries and Occupation Award 2020 	LOW	<ul style="list-style-type: none"> Annual wage review decisions from Fair Work Commission applied. Annual remuneration review conducted for other non-award workers.
Local subcontractor drivers (and their employees)	Subcontractors may not always be truthful and forthcoming about work status and potential restrictions. Independent due diligence completed. Conformance: A situation that conforms to the requirements of policies, standards, procedures, systems, or regulation(s) applicable to the Transport service provider	Visa checks completed through MakeSure and/or Human Resources department (HR) during application process. HR also undertakes monthly checks of all workers who have restrictions.	Visa checks completed.	<ul style="list-style-type: none"> Transport Industry – General Carriers Contract Determination. NSW – Subcontractors statement regarding Workers Compensation, Payroll Tax and Remuneration Award or Industrial Instrument 	LOW	Industrial instruments reviewed annually. Generally conducted in line with employee reviews. Renewal every two years to require details of subcontractor and their employee work rights. Contains clause relating to Modern Slavery to confirm compliance with legal employment and anti-slavery obligations.

						<p>Conduct a Contract Carrier Audit with transport providers with 2 or more drivers to determine the capability and effectiveness of the organisation's management system in ensuring continual compliance with customer, statutory and regulatory requirements and in meeting specified objectives and the conformity of the management system to stated criteria.</p> <p>NOTE: not required for carriers with 10 or less workers.</p>
Interstate linehaul contractors (outside hire)	<p>Conformance: A situation that conforms to the requirements of policies, standards, procedures, systems, or regulation(s) applicable to the Transport service provider</p>	<p>Approximately 90 linehaul contractors in use at any one time. Due to impracticality of checking every provider, a signed copy of AirRoad's Modern Slavery Statement for Suppliers (AR-HR-QF-1083) is obtained from each contractor.</p>	Contract determination or Industrial Instrument		MED	<p>A signed copy of AirRoad's Modern Slavery Statement for Suppliers (**AR-HR-QF-1083) is obtained from each contractor.</p> <p>Conduct a Contract Carrier Audit to determine the capability and effectiveness of the organisation's management system in ensuring continual compliance with customer, statutory and regulatory requirements and in meeting specified objectives and the conformity of the management system to stated criteria.</p> <p>NOTE: not required for carriers with 10 or less workers.</p>

Labour hire providers	Transient workforce	<p>Contract with agency providers states that visa checks must be completed on all applicants before being submitted to AirRoad as a worker. On boarding requirements and contracts managed through the AirRoad Human Resources department.</p> <p>A signed copy of AirRoad’s Modern Slavery Statement for Suppliers (AR-HR-QF-1083) is also obtained from each labour hire provider.</p>	<p>On boarding requirements and contracts managed through the AirRoad Human Resources department.</p>	<p>Relevant Award and Classification listed on each invoice submitted for payment.</p>	<p>LOW</p> <p>A signed copy of AirRoad’s Modern Slavery Statement for Suppliers (**AR-HR-QF-1083) is obtained from each labour hire provider.</p>
Delivery agents	Register of all Contractors engaged by the Service Provider	<p>Approximately 70 delivery agents in use at any one time. Due to impracticality of checking every provider, random Carrier Assessment audits AR-QF-0007 are conducted.</p> <p>Where deemed necessary a signed copy of the AirRoad Modern Slavery Statement for Suppliers (AR-HR-QF-1083) is obtained.</p> <p>NOTE: not required for carriers with 10 or less workers.</p>		N/A	<p>MED</p> <p>A signed copy of the AirRoad Modern Slavery Statement for Suppliers (**AR-HR-QF-1083) is obtained.</p> <p>Conduct a Contract Carrier Audit AR-QF-0007 on a random basis to determine the capability and effectiveness of the organisation’s management system in ensuring continual</p>

					compliance with customer, statutory and regulatory requirements.
Service/maintenance suppliers		Low frequency/volume of engagement. Checks impractical to complete.		LOW	N/A

***See attached Schedule A – AR-HR-QF-1083 – Modern Slavery Statement for Supplier*

9. OUR EFFECTIVENESS IN COMBATING SLAVERY

We manage risks to our business by maintaining consistent and high standards of due diligence and risk mitigation processes to monitor and avoid modern slavery in our supply chains.

To assess the Group's effectiveness in combatting slavery we regularly review our policies and procedures, particularly around risk mitigation and contractor or supplier engagement. Key personnel are tasked with keeping on top of changes to relevant legislation, and ensuring this information is fed through the key decision makers within the Company. These include the SLT, HR, Quality and Safety departments within the Company.

10. PLANS FOR FUTURE ACTION

AirRoad acknowledges the importance of taking active steps to reduce modern slavery risks as well as monitoring its performance in this area. Our Modern Slavery due diligence process has identified key risk areas to monitor as well as regular actions to take to address those risks.

We will be communicating acceptable standards of behaviour with our core suppliers to ensure that modern slavery risks throughout their supply chain are understood, and that these are in turn cascaded down their own supply chains.

We are establishing an ESG Group who will assess and regularly review our performance and actions taken in addressing slavery risks. This group is made of members from our Quality, Human Resources, Safety, Finance, Operations and Legal teams.

APPROVAL:

This Statement is endorsed and approved by the AirRoad Board of Directors.

Signed by AirRoad Managing Director on behalf of AirRoad Board of Directors:



14 January 2026

(signature)

(date)

Malcolm Thorpe
Managing Director

Schedule A – AR-HR-QF-1083 – Modern Slavery Statement for Suppliers

1. INTRODUCTION

This Statement has been prepared by [insert supplier company's name] (**Supplier**) at AirRoad's request.

[WHERE APPLICABLE] This Statement is being prepared at AirRoad's request pursuant to the agreement dated [DATE] between the Supplier and AirRoad Pty Ltd.

2. PURPOSE

The purpose of this Statement is to assure AirRoad that the Supplier is taking all reasonable steps to ensure that there are no modern slavery practices in its supply chains or business operations.

This Statement has **not** been prepared for the purpose of meeting the Supplier's obligations (if any) under applicable modern slavery legislation including without limitation the *Modern Slavery Act 2018* (NSW) and the *Modern Slavery Act 2018* (Cth) as amended from time to time (**Slavery Legislation**). The Supplier acknowledges that it may have separate obligations under the Slavery Legislation to prepare additional statements relating to modern slavery.

3. STATEMENT

The Supplier affirms that, for the period of 12 months prior to the date of this Statement, it:

- a) has complied with, and has taken all reasonable steps to ensure that its personnel and the personnel of any subcontractors have complied with all applicable laws, statutes, regulations and codes relating to modern slavery, servitude, forced or compulsory labour and/or human trafficking including but not limited to relevant provisions of the Slavery Legislation as amended from time to time (**Relevant Requirements**);
- b) has complied with, and has taken all reasonable steps to ensure that its personnel and the personnel of any subcontractors have complied with any AirRoad policies and procedures relating to the Relevant Requirements as communicated and amended from time to time;
- c) has maintained and communicated its own policies and procedures to meet the Relevant Requirements and enforced them where appropriate;
- d) has maintained appropriate due diligence procedures for its own suppliers and subcontractors to ensure that there is no modern slavery, servitude, forced or compulsory labour and/or human trafficking in its supply chains or business operations. This includes having systems in place to, amongst other things:
 - i. identify and assess potential risk areas in its supply chains;
 - ii. mitigate the risk of modern slavery occurring in its supply chains; and
 - iii. monitor potential risk areas in its supply chains.
- e) has notified AirRoad of any actual or suspected breaches of any of the Relevant Requirements that it has become aware of in connection with the provision of its goods or services to AirRoad;

- f) has not, and to the best of its knowledge its personnel have not, been convicted of any offence involving a breach of the Relevant Requirements or been the subject of any investigation, inquiry or enforcement proceedings regarding any offence or alleged offence in connection with the Relevant Requirements; and
- g) has taken all other reasonable steps to ensure that there is no modern slavery in its supply chains or any part of its business operations.

4. ACCURACY OF INFORMATION IN STATEMENT

The Supplier affirms that the information in this Statement is true and correct. The Supplier acknowledges that AirRoad is relying on this information to ensure its compliance with the Slavery Legislation.

Signed by: _____
Authorised Representative

Name: [INSERT NAME OF AUTHORISED REPRESENTATIVE]

For and on behalf of [INSERT NAME OF SUPPLIER COMPANY]

Date: _____