



**AWH PTY LTD**  
**(ACN 069 066 842)**

## **MODERN SLAVERY STATEMENT FY23-24**

### **1. INTRODUCTION**

This Modern Slavery Statement is provided by AWH Pty Ltd (ACN 069 066 842) in accordance with the Modern Slavery Act 2018 (Cth). This Statement outlines AWH's process for identifying potential modern slavery risks, and our approach to mitigating such risks.

This Statement applies to the financial year 1 July 2023 to 30 June 2024 (**Reporting Period**) pursuant to its obligations under the Modern Slavery Act 2018 (Cth).

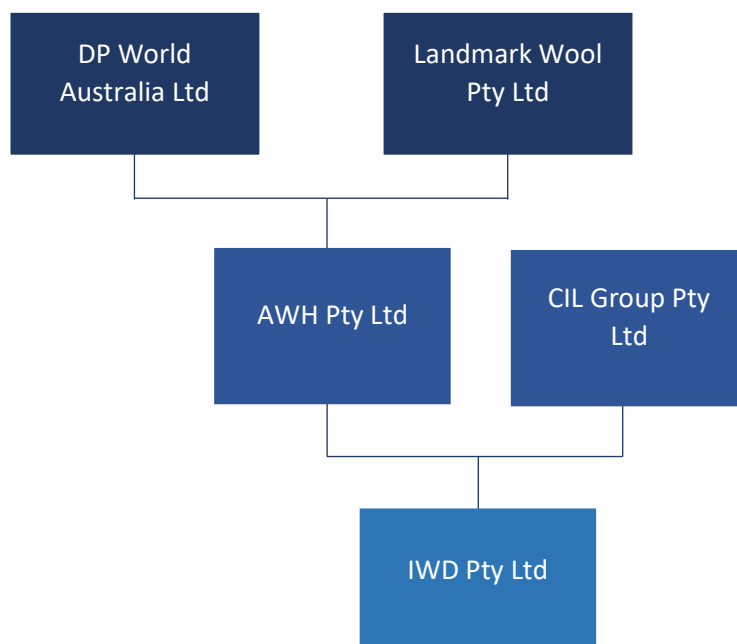
Respect for human rights is fundamental to AWH Pty Ltd (ACN 069 066 842). AWH remains committed to ensuring that people connected to its supply chain are treated with dignity and respect.

This is AWH's fourth Modern Slavery Statement prepared in accordance with our obligations under the Modern Slavery Act 2018 (Cth) and our focus during the Reporting Period has been to maintain our zero-tolerance approach to modern slavery and educate staff at all levels regarding the risks of modern slavery.

### **2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS**

AWH is a proprietary limited company which was established as a joint venture company in the 1990s. AWH has two 50% shareholders - DP World Australia Ltd (ACN 129 842 093) and Landmark Wool Pty Ltd (ACN 076 744 619). Each shareholder has 3 directors appointed to the AWH Board who were consulted in the development of this statement.

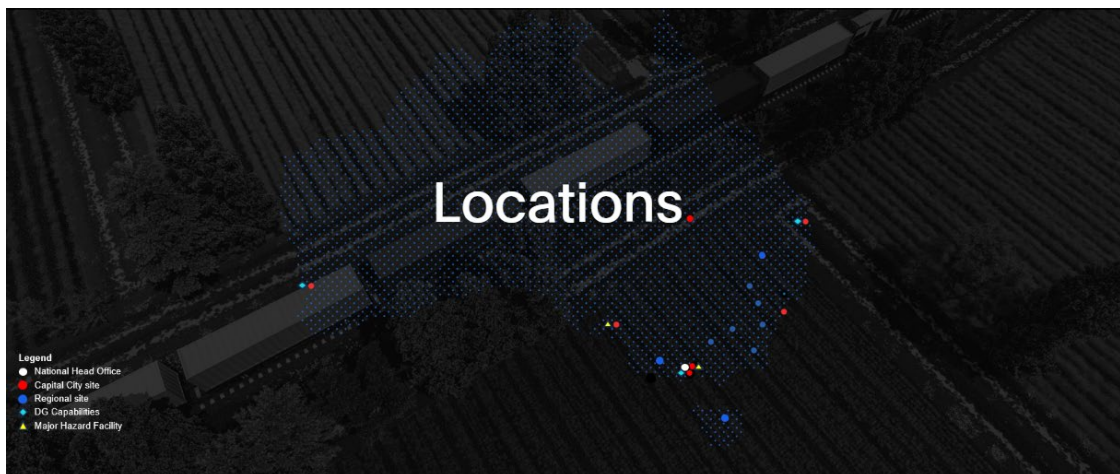
AWH is a 50% shareholder in a wool dumping proprietary limited company operating in Western Australia known as IWD Pty Ltd (ACN 064 681 572). The other 50% shareholder is CIL Group Pty Ltd (ACN 008 690 293). We consulted with IWD in the development of this statement.





AWH has 368 employees and operates out of 16 sites across Australia, namely:

Major Centre Sites	Regional Sites
Lara, Victoria (Head Office)	Bathurst, NSW
Laverton North, Victoria (from FY23-24)	Goulburn, NSW
Brooklyn, Victoria	Wagga Wagga, NSW
Yennora, NSW	Tamworth, NSW
Rocklea, Queensland	Dubbo, NSW
Gillman, South Australia	Yarrawonga, Victoria
Bibra Lake, Western Australia	Hamilton, Victoria
Launceston, Tasmania	
Wetherell Park, NSW	



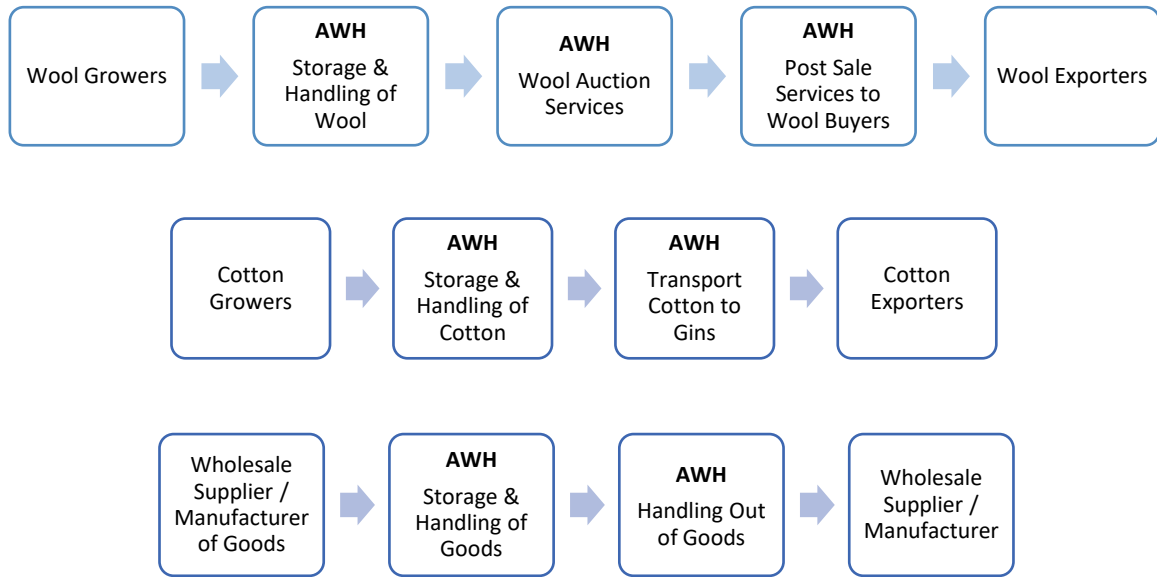
AWH occupies over 630,000 square metres of undercover warehousing space and 65,000 square metres of hardstand across these sites.

AWH is Australia’s largest wool and independent cotton handler, and is one of Australia’s leading general warehouse, dangerous goods and specialist logistics providers, with a comprehensive capability in storage and handling. AWH also currently operates as a Major Hazard Facility at the following locations:

- Gillman
- Laverton North

AWH handles close to 650,000 bales of wool annually, being over 35% of Australia’s annual wool clip. AWH also provides auction sale room services for the 3 national wool selling centres. When seasonal conditions allow, AWH also handles more than 900,000 bales of cotton annually.

AWH’s supply chain predominantly consists of customers requiring storage and handling services as follows.



Our wool customers generally operate in Australia but may sell their wool through AWH’s wool auction system to entities who intend to export that wool.

Our cotton customers also generally cotton growers who operate within Australia.

Our logistics customers, generally operate within Australia, with some being involved in the import of products into Australia.

While AWH is a service provider, in the ordinary course of business, AWH procures goods and services from external third parties. During the Reporting Period AWH’s utilized approximately 930 suppliers, in connection with the provision of the following goods and services:

Type of Goods/Services Providers	Description
Office equipment / consumables	Tea room supplies, cleaning products, office furniture, printing, stationery, uniforms
Technology and IT hardware	Electronics, tablets, laptops, desktops, mobile phones
Technology and IT services	Software and IT security services
Plant & Equipment	Hire of forklifts and Aislemasters
Professional Services	Auditors, tax consultants, legal advisors, fire engineers, building surveyors
Facilities	Lease of property from property owners
Facilities Management	Cleaning and security of premises
Utilities	Power, water, gas
Labour Hire	Engagement of short-term labour



### 3. RISKS OF MODERN SLAVERY

AWH is a service provider whose operations are based in Australia. As our business model does not involve manufacturing or production of physical products, the likelihood of causing, being linked to, or contributing to modern slavery is extremely low.

Our employee workforce is employed solely in Australia. A new collective agreement was negotiated without our warehouse employees in 2024. In order to ensure our employees' interests properly recognized, AWH involved itself in an extensive negotiation program and our employees had Union assistance. The AWH Collective Agreement 2024 was voted up by our warehouse employees and is currently in operation.

Our office staff, save for employees who earn over the High-Income Threshold, are subject to the AWH Staff Collective Agreement 2023, ensuring all our employees receive no less than the minimum entitlements under the National Employment Standards.

Any risk of modern slavery would likely exist in circumstances where AWH engages third party service providers to provide equipment, labour and ad hoc services. However, AWH's process of onboarding new employees is extremely rigorous. We only use reputable recruitment agencies and require them to complete our Modern Slavery Questionnaire before we commit to using them.

### 4. ACTIONS

Our contracts with suppliers include specific clauses requiring them to comply with all applicable laws. In addition, our contracts have a specific modern slavery clause which references our Modern Slavery Policy.

AWH only engages reputable suppliers who are generally Australian based. Our key suppliers in the property leasing, equipment hire, and insurance space are generally large Australian corporations that are subject to the Modern Slavery reporting obligations.

We require all of our potential suppliers to complete our Modern Slavery Questionnaire prior to AWH agreeing to engage them. The completed questionnaires are reviewed by our in-house lawyer and a decision is then made on a case-by-case basis whether or not the supplier should be engaged. All potential suppliers are provided with a copy of the AWH Modern Slavery Policy and are required to undertake to comply with that policy.

We collect and review the Modern Slavery policies of those suppliers who have such a policy.

All suppliers that we engage are required to comply with a number of other AWH Policies that are in operation to ensure that our business is conducted safely, with integrity and in compliance with applicable laws. These policies include:

- Whistleblowing Policy
- Business Ethics & Conflict of Interest Policy
- Contract Policy
- Delegation of Authority Policy
- Risk Management Policy
- Customer Corrective Action Request Policy
- Discrimination Policy
- Employee Code of Conduct
- Discipline Policy
- Recruitment and Selection Policy



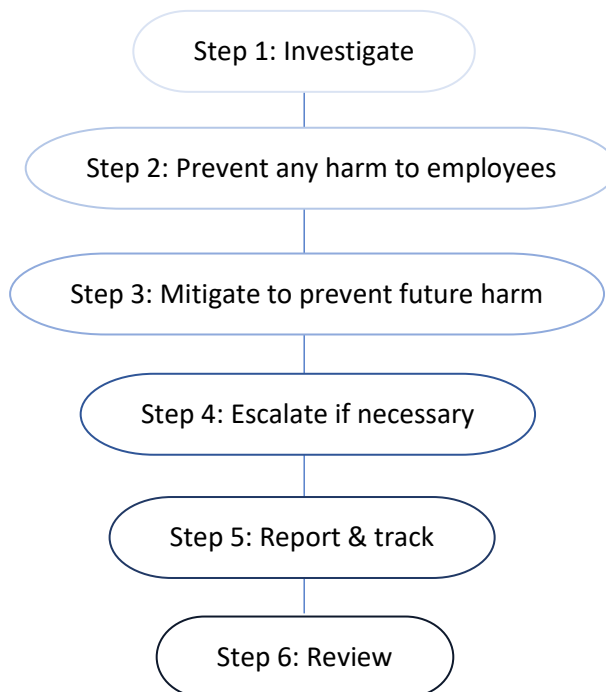
The policies are regularly reviewed to ensure they are legally up to date and relevant to the business.

Management and the Board of AWH understand that it can better identify and reduce the risks of modern slavery by ensuring all of its employees have an understanding of such risks. As such, AWH conducts both internal and online modern slavery training. Through this training Staff are educated in the identification of modern slavery, the different types of modern slavery and how modern slavery risks exist in our business and the industries we operate in. Real life Australian examples and statistics were provided to emphasise the reality of modern slavery and staff were encouraged to openly identify and discuss modern slavery risks and familiarize themselves with procedures that can minimize such risks.

We consult with the Board and key employees of IWD Pty Ltd (AWH has a 50% shareholding) to ensure that they have an understanding of modern slavery risks.

We promptly complete Modern Slavery Questionnaires of our customers, when requested to do so.

If one of our suppliers was suspected of non-compliance with our Modern Slavery Policy, the following process would be initiated:



**5. EFFECTIVENESS**

We are monitoring the effectiveness of the processes and procedures to address the modern slavery risks that our business is exposed to, in line with the UN Guiding Principles. This monitoring involves both quantitative and qualitative indicators.

We assess our employees’ understanding of modern slavery risks by requiring them to undertake written modern slavery tests after modern slavery training. We have a system known as *Donesafe* which records all employees’ training and notifies our HR department of those employees who are delinquent in their training.

We maintain an internal Modern Slavery Register which stores details regarding any modern slavery risks, as well as all completed modern slavery questionnaires. This enables us to better hold suppliers to account.



The modern slavery clause in our supplier and customer contracts ensures that we have incorporated the modern slavery obligations into our contractual relationships and can keep track of compliance as a part of our regular contractual reviews.

Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery. To date, we have not identified any modern slavery concerns through our processes.

In FY24-25 we are looking to automate our Modern Slavery Questionnaire process.

## 6. CONTINUOUS IMPROVEMENT

AWH had a number of priorities for FY23-24 directed towards further reducing the risk of modern slavery, including:

- Reviewing and revising our onboarding protocols to ensure they are best practice:

This includes ensuring that processes are in place to properly assess modern slavery risks that may arise from potential suppliers and customers. With the employment of a new General Manager of Business & Commercial Development, we have restructured our BD and customer service teams so that they report to this General Manager. This centralisation means that we have better oversight over onboarding of suppliers and customers.

- Training and awareness activities:

This has continued in FY23-24 through both external and internal training at all levels of the organisation (both office staff and warehouse employees).

- Modern Slavery posters:

These have been produced and posted at all AWH sites.

AWH will continue to explore key performance indicators that will help keep track of, and assess, modern slavery risks and the effectiveness of measures in place to minimize such risk.

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

Signed by:  
  
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**Adrian Capogreco**  
**Chairman of the Board**  
**AWH PTY LTD**

Dated: 24 October 2024 | 11:10 AM AEDT