

AAW Global Logistics Modern Slavery Statement FY 2023





Message from the Managing Director

Modern slavery remains a pervasive and intricate global issue, touching nearly every sector. According to the Global Slavery Index, a staggering 49.2 million people worldwide endure various forms of modern slavery, with a significant portion—42 million—being exploited within international supply chains¹. As an international company deeply entrenched in the supply chain industry, it becomes imperative for us to actively engage in the fight against modern slavery. **Our commitment to responsible business practices stands as a foundation, ensuring that we consistently uphold our pledge to respect, protect, and fulfill human rights.**

We ensure that our procurement and human resources practices are conducted with a strong commitment to ethical standards. We have integrated continuous reviews into our approach to ensure the effectiveness of our systems, policies, and actions in identifying and addressing the risks associated with modern slavery. Concurrently, we maintain a steadfast dedication to raising awareness by providing education to both our internal staff and external partners. This comprehensive strategy reflects our proactive stance in creating a responsible and ethically sound business environment.

Despite having low operational risk and no identified modern slavery cases, we consistently review potential risk areas, promptly addressing any policy gaps. **The modern slavery risk assessment is geared towards future-proofing our operations and supply chain, aligning with legal mandates, societal expectations, and principles of responsible business conduct.**

We take pride in presenting our Modern Slavery Statement for FY2023, a detailed document outlining our ongoing efforts to mitigate the risk of modern slavery in both our operations and supply chain. This commitment reflects our dedication to fostering a world where ethical practices prevail, leaving no room for the scourge of modern slavery in our operations and supply chain.

A handwritten signature in black ink that reads "Andrew Maguire". The signature is written in a cursive, flowing style.

Andrew Maguire
Managing Director

¹ Walk Free (2023). *Global Slavery Index*. [online] Walk Free. Available at: <https://www.walkfree.org/global-slavery-index/>.

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1. Purpose of the Statement

AAW Global Logistics (AAW) recognises and accepts our responsibility to respect the human rights of all people without any discrimination and are committed to preventing and addressing any risks of adverse human rights impact linked to our operations and supply chain. As part of our commitment to upholding human rights for all, we take a stand against modern slavery, and commit to working with all our stakeholders to reduce and eradicate the practice of modern slavery and human trafficking within our operations and beyond.

This Modern Slavery Statement, made pursuant to the Australian Modern Slavery Act 2018 (the Act), aims to articulate the risks of modern slavery within AAW's operations and supply chains, and the steps we have taken, and will take in subsequent reporting periods, to manage and address these risks.

Our Modern Slavery Statement has been prepared in accordance with the mandatory reporting criteria required by the Act, being:

- A description of AAW entity and its structure;
- An outline of our operations and supply chains;
- An assessment of the potential modern slavery risks in those operations and supply chains;
- Actions taken to assess and address those risks in the reporting period;
- Assessment of the effectiveness of such actions and future steps;
- A description of the process of consultation with the entities owned and controlled by AAW in preparing this Modern Slavery Statement.

2. Understanding Modern Slavery

Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine personal freedoms. Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

It does not include practices like substandard working conditions or underpayment of workers, though 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. Modern slavery also distorts global markets, undercuts responsible businesses, and can pose significant legal and reputational risks to entities.

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.

In committing to take action to combat modern slavery in our operations and supply chains, AAW can protect against harm to our business and our clients' businesses and improve the integrity and quality of our supply chains, and our client's supply chains.

3. Our Structure and Operations

Established in 1983, AAW Global Logistics Pty Ltd (AAW) (ABN: 14 007 257 865) is a renowned international freight forwarder. With a team of approximately 100 professionals, we operate from strategically located offices in Melbourne, Brisbane, Sydney, Adelaide, Fremantle, and Auckland.



Our global market coverage extends across all aspects of transportation and logistics, enabling us to deliver a comprehensive "Total Global Multi-Model Service" to our valued customers. Tailoring our offerings, we provide specialized services such as transportation and distribution, warehousing and storage, pre-retailing, dedicated transportation, project management, customs brokerage, and consultancy. Over the years, our company has expanded and diversified, now offering a wide range of services through our specialised divisions.

	<p>International Freight Forwarding – Global Coverage: Sea & Air AAW Global Logistics (AAW) is a Freight Forwarding company – offering a variety of expertise throughout Australia / New Zealand & Internationally: Freight Forwarding (Export & Import, Sea & Air, Consolidation Products, Reefer Focus), Customs Brokerage, Warehouse & Fulfilment, 3PL Solutions, Supply Chain Solution (Lighthouse)</p>
	<p>Domestic Australian Coastal Cargo Movements & Road / Rail services Coastalbridge specialises in Sea, Road, and Rail movements of dry and refrigerated cargo between all major Australian cities. Coastalbridge’s service network extends across Australia including North Queensland, Tasmania, and Northwest WA. Coastalbridge can also offer bespoke door-to-door logistics solutions</p>
	<p>ISO Tanks / Flexi-tanks & Specialised ‘Dangerous Goods’ Forwarding HOYER Logistics Australia: provides specialised logistics services to the Australian and New Zealand domestic markets. This includes fleet management, domestic transportation of chemical products, foodstuffs, and cryogenically liquefied gases. Logistics Services are provided in addition to the leasing of ISO Tank Containers and IBCs. Full-service Flexi-tank operations are also provided by the team HOYER Global Agency Australia: provides full end-to-end international services for the movements of ISO Tanks and Flexi-tanks to worldwide destinations</p>
	<p>Regional Australia Specialisation – Fresh Produce and General Cargo Regional Shipping Services (RSS) specialise in servicing the logistics needs of Regional Australia. With dedicated experienced staff, RSS has technical expertise in Cold Chain logistics and understands the unique challenges facing the many industries in key regional areas of Australia</p>
	<p>Specialised Project forwarding, including full vessel charters AAW Project Logistics is a team of highly skilled & experienced project professionals who develop engineered transport solutions for project cargoes to and from all points of the globe, including cross-trade movements. Services include Break & Containerized Cargo, Heavy Lift & Modular Cargo, Transport Engineering, Project Management Door to Door, Part & Full Vessel Chartering, Multimodal Freight Solutions, Turnkey Industrial Projects, and Project Logistics & Consultancy</p>
	<p>Supply Chain Management & Logistics Services PIL Logistics Australia (PILLA) is a boutique Freight Forwarder, with broad reaching global integrated logistics capabilities. PILLA seeks to build long term partnerships delivering customised services and value for Blue Chip Organisations and specialised SME’s markets: FMCG, Agriculture, Chemicals, Raw Materials and Commodities Trading</p>

4. Our People

In FY2023, AAW's workforce, including casual employees and independent contractors, increased to around 101 employees across our Australian and New Zealand operations. As part of our HR Policy, we use only reputable recruitment firms and follow all applicable laws and regulations. We regularly review our recruitment procedures and recruitment providers to ensure a transparent and fair hiring process that can assist HR personnel to select the right candidate based on merit and job fit, as well as to avoid discriminatory behavior at all stages of the overall recruitment process.

At AAW, we understand that our most valuable asset is our people. Therefore, we prioritise employee welfare by fostering a supportive work environment, promoting well-being programs, and providing workplace flexibility.

As an employer, AAW takes steps to ensure that all new team members are appropriately qualified and authorised to work in their respective countries. Remuneration is determined by taking into account the skills and experience required to safely perform the role, current market salary data, any applicable Modern Awards, and parity with colleagues performing the same or similar role regardless of any protected characteristics. Salaries are reviewed on an annual basis to ensure that employees are compensated fairly and appropriately for their time and efforts, as well as their skill development.

Cultivating a culture of continuous learning in our workplace has become a business imperative. Our primary HR goal is to provide people with the skills, tools, and support they need to do their jobs, as well as opportunities to advance their careers.

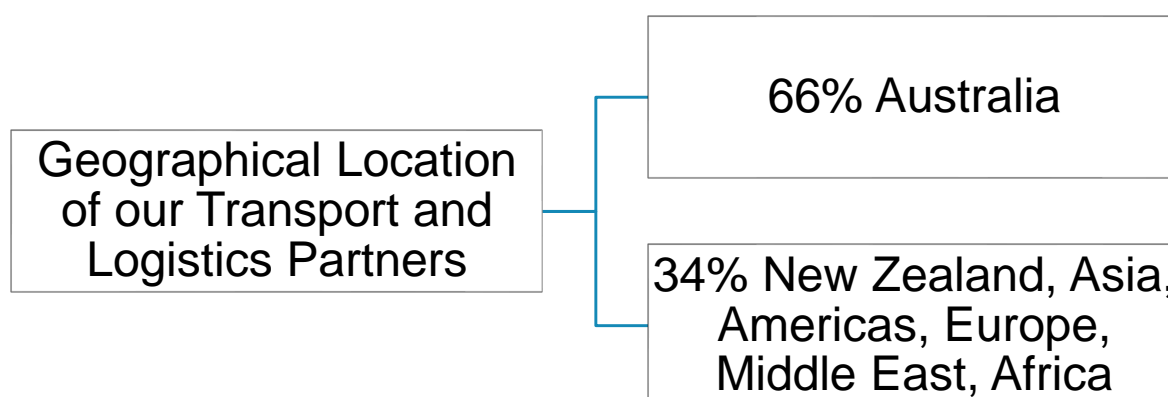
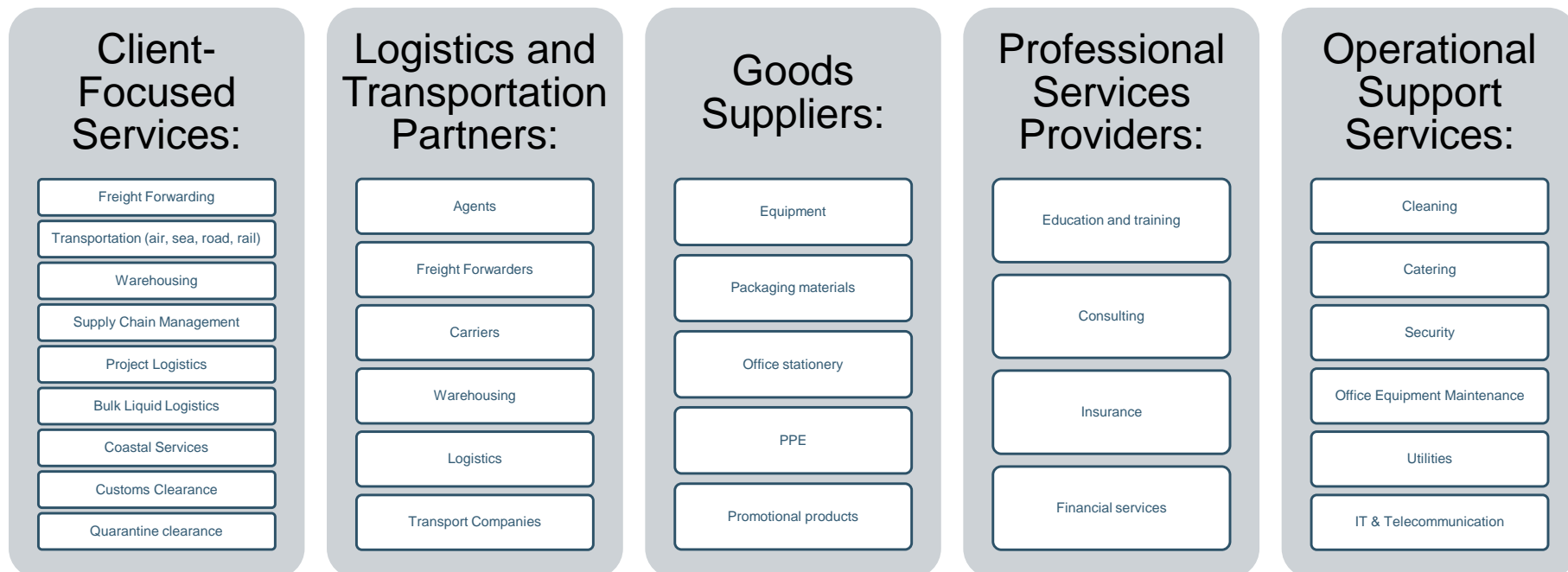
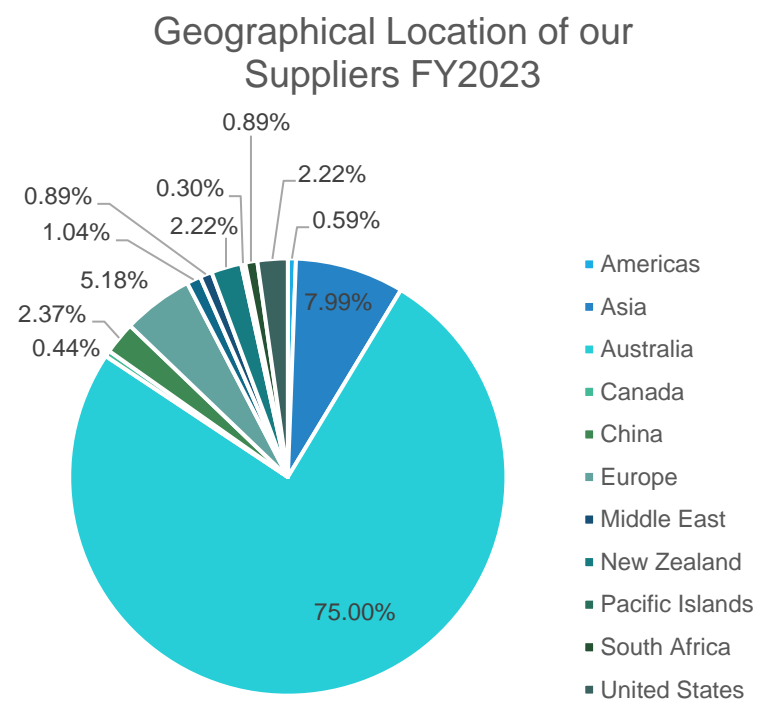
All our employees have access to grievance channels through which they can express their concerns, through WHS incident reporting, Working Together Policies, and our whistleblowing mechanisms. AAW is committed to protecting employees who report wrongdoing and will ensure that all disclosures made in accordance with whistleblowing procedures are treated confidentially and without fear of retaliation.



5. Our Supply Chain

As an international freight forwarder, we have established business relationships with suppliers locally and around the world, in order to provide our customers with access to the highest levels of service and efficiency in the transit of their goods. At AAW, we understand the importance of human rights and dignity, and are committed to working with likeminded businesses, so that we do not intentionally contribute to modern slavery as we carry out our role as a player in the international supply chain.

For this reporting period, AAW's supply chains encompass the following types of services:



6. Risks of Modern Slavery in our Operations

OPERATIONS RISK

In FY2023, AAW has continued to operate solely in Australia and New Zealand, where there is less of a geographical risk of modern slavery. We acknowledge that modern slavery exists in both countries, particularly in relation to vulnerable workers, migrants, and/or workers in low-skilled positions or in casualised or insecure forms of work.

AAW continues to outsource a small percentage of our operations and accounting functions to the Philippines, which has a high geographic risk of modern slavery according to the Global Slavery Index. Our outsourced operation in the Philippines provides AAW with entry level clerical services. AAW's operations in the Philippines are not in an industry identified by the Global Slavery Index as being an industry with a risk of modern slavery, however AAW is cognisant of the elevated risks in this aspect of our operations. AAW conducts visits to the Philippine office twice a year on average, which enables us to observe workplace conditions.

LABOUR RISK

Throughout the reporting period, AAW has upheld a diverse workforce, encompassing permanent full-time and part-time employees, as well as temporary and casual staff. Our team, situated in Australia and New Zealand, primarily undertakes office-related responsibilities.

In our Australian operations, small percentage of our employees are covered by a Modern Award, and those employees receive terms and conditions greater than the legislated minimums.

Additionally, a small portion of our workforce operates as casual employees, and individuals engaged under independent contracts. This flexible employment framework underscores our commitment to adaptability, ensuring a range of employment arrangements tailored to the evolving needs of our workforce. It's important to note that while acknowledging the potential for modern slavery in Australia, a significant 93% of our employees are skilled professionals. This composition significantly mitigates the risks associated with modern slavery, emphasising our commitment to maintaining a workforce characterised by expertise and professionalism.

“Effectively managing operational risk involves identifying, assessing, and mitigating potential threats to ensure the continuity and resilience of business operations.”

RECRUITMENT RISK

In relation to deceptive recruitment practices, we acknowledge that modern slavery risks are prevalent in this area, even in Australia.

In FY2023, AAW continued to engage temporary workers through labour hire agencies, but only through agencies who are members of Australian and New Zealand recruitment industry associations such as corporate AHRI and RCSA memberships. Labour hire providers are required to be licensed in several Australian jurisdictions. Workers engaged through labour hire agencies are engaged in Australia and New Zealand to perform administrative support work for AAW. The entitlements for all temporary labour hire appointments are confirmed in writing, regardless of the type of work an individual is engaged to undertake.

As part of the induction process, AAW continues to provide new employees with a copy of AAW's Whistleblower Policy, which includes a mechanism for reporting modern slavery, as well as access to health and safety reporting mechanisms and other training and information as appropriate to perform their role.

AAW uses the services of a reputable recruitment agencies on occasion to assist with temporary and permanent appointments, and we are aware of the inherent risks of outsourcing recruitment. The recruitment agencies we engage do not charge recruitment fees to prospective or successful employees. As we only use reputable recruitment agencies, the risk of modern slavery occurring in this element of our operations is low.

AAW consistently integrates a checklist into our recruitment process, serving as a proactive measure to prevent incurring recruitment costs for potential or successful candidates.

“In safeguarding our business from recruitment risk, we have instituted a set of proactive measures and best practices. Our recruitment policies stand as clear guidelines, articulating the procedures, criteria, and standards for hiring to ensure a structured and error-resistant process. Detailed and accurate job descriptions serve as a foundation, attracting candidates who align with our needs and minimizing the risk of mismatched hires.”



7. Risks of Modern Slavery in our Supply Chains

AAW utilises cleaning, catering, and security services for our Australian and New Zealand offices through contracting arrangements with companies who supply these services. While the workers are based in Australia and New Zealand, AAW recognises that these industries have a higher risk of modern slavery even within these countries. Workers may come from vulnerable groups, such as low-skilled workers and those from migrant, low-income, or culturally and linguistically diverse backgrounds. If not managed properly, this increases the risk of potential modern slavery practises.

AAW uses IT support services for our operations, which are provided by a contracting arrangement company. While the companies we work with are based in Australia, their employees may be located in other countries, posing a geographical risk of modern slavery. AAW has limited visibility into this supply chain, and will make efforts to look into this further in the future.

AAW procures giftware promotional products, office supplies and uniforms which may be manufactured in various locations outside Australia, however they are purchased locally in Australia and from reputable office supplies stores and promotional merchandising suppliers. AAW does not have much visibility over this supply chain, however noting that supply chains related to uniforms and branded products may have a high risk of modern slavery, these supply chains will need to be investigated further.

AAW engages freight forwarders and transportation companies based in Australia, New Zealand, Pacific Islands, Asia, Middle East, Americas, Europe, Africa, and to manage the importation / exportation of products to and from Australia for the company and its clients. Due to the lengthy and complex nature of international transportation supply chains, there is a risk that modern slavery occurs (or is at a higher risk of occurring) in such supply chains which may not be easily assessed or addressed by AAW.

AAW acknowledges that, as a link in the global transport network, our supply chains are lengthy, and we have limited visibility and minimal ability to exert control, particularly in circumstances where key suppliers are far larger than AAW. Some of these larger suppliers have made public commitments regarding human rights and modern slavery, and many are likely to be reporting entities under the Act. Notwithstanding this, in future AAW will endeavour to leverage its longstanding business relationships with larger entities in this industry with a view to encouraging a similar focus on modern slavery.

8. Our Actions

POLICIES AND STANDARDS

AAW has taken steps to address risks of modern slavery within our business and supply chain through implementation of policies and procedures. AAW will continue to build on this, and any new policies that are implemented will be reported in subsequent reporting periods. The most important policies and procedures that we have in place, as well as the steps we have taken to mitigate the risks of modern slavery, are outlined below:

Bullying, Harassment, and Discrimination Policy

AAW is committed to preventing bullying, harassment and discrimination and has implemented policies that reflect the company's commitment to provide a safe and healthy work environment. Workplace bullying and harassment will not be tolerated under any conditions. This policy outlines AAW's commitment to a safe workplace and is intended to ensure, to the greatest extent possible, that employees are not subjected to any form of bullying, harassment, or discrimination while at work. This policy was updated during this reporting period and is tabled for further review in FY24 to ensure continued compliance with the Fair Work Act and its amendments.

Whistleblower Protections Policy

We are committed to promoting a culture of open and honest communication, corporate compliance, and governance. As part of that commitment, AAW has had a Whistleblower Protections Policy in place for a number of years now. This policy serves as a confidential reporting mechanism through which people within and outside our business can register concerns or file reports about any suspected misconduct or an improper state of affairs including unethical, illegal, or other inappropriate conduct.

The policy explicitly mentions modern slavery and has been made more accessible to the community and workers of our suppliers (and their suppliers) for the aim of reporting modern slavery risks or concerns directly to AAW so that they can be addressed and resolved. The Policy is available to all employees via our intranet and employee handbook, and to the general public via our [website](#). During the reporting period, we did not receive a Whistleblower report.

Flexibility at Work Policy

To continue to support our employees to better balance work and their personal life and responsibilities, all employees who have completed their training period can access flexible arrangements through the Flexibility at Work Policy. This initiative builds on our commitment to improve the retention of our staff and their well-being, support diversity and continue to build on our people-first strategy. This reporting year, we updated the procedures for reviewing and approving working from home arrangements to ensure our team have a safe environment to work. The checklist is required to be completed annually, or when an employee's home office set-up significantly changes, so AAW can continuously evaluate the home environment as a safe place to work.



Working Together Policy

The Company respects every employee's right to be treated with dignity, respect, and courtesy. Employees should be able to come to work in an environment that reflects harmony, safety, and security, and that is free of harassment and discrimination, and the Company will make every effort to ensure that this happens. As part of this commitment, AAW reviewed and updated our Working Together Policy to ensure that the Company provides a safe and healthy working environment. The Policy is available to all employees via our intranet and is referenced in our Employee Handbook.

Equal Employment Opportunity (EEO) Policy

The Company is committed to providing equal opportunities for all applicants and employees of the Company, in all areas of employment, and in the terms and conditions of employment, regardless of sex, race, marital status, political or religious beliefs, or other protected characteristic. Company policy requires that Equal Employment Opportunities will be provided in all aspects of employment including recruitment, promotions remuneration and other terms and conditions of employment.

Modern Slavery Policy

AAW is committed to protecting our employees' rights and maintaining the highest human rights, ethical, and modern slavery standards. As a result, during this reporting period we developed our Modern Slavery Policy, which affirms the Company's commitment to contributing to the abolition of all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Modern Slavery Policy is published on our intranet for our employees, and on our website for the outsourced operations team in the Philippines and the general public. In FY2023, AAW did not receive any reports of modern slavery in our operations or supply chains.

Employee Code of Conduct Policy

This year, we are progressing with the development of an employee code of conduct policy. This important document will describe the expected standards of behavior for employees and outline the company's approach to conducting business. By clarifying staff expectations and preventing inappropriate behavior, it aims to eliminate ambiguity. It also fosters a positive ethical culture in which all employees are treated equally and with respect. While a summary of this policy is included in the Employee Handbook, the detailed document has been delayed and will be communicated to both new and existing staff during the reporting period in 2024.

Hours of Work Policy

In the course of this year, we continued to further refine our Hours of Work Policy draft. This policy serves as a comprehensive guide for the provision of fair and equitable working hours, work allocation, and work arrangements, as well as to ensure that Employees are aware of, and able of fulfilling, their responsibilities in relation to their employment with the Company. Currently, we are reviewing the final draft to ensure its alignment with the latest amendments to working hours stipulated in the Fair Work Act. The official release is scheduled for the upcoming reporting period.

Employee Handbook

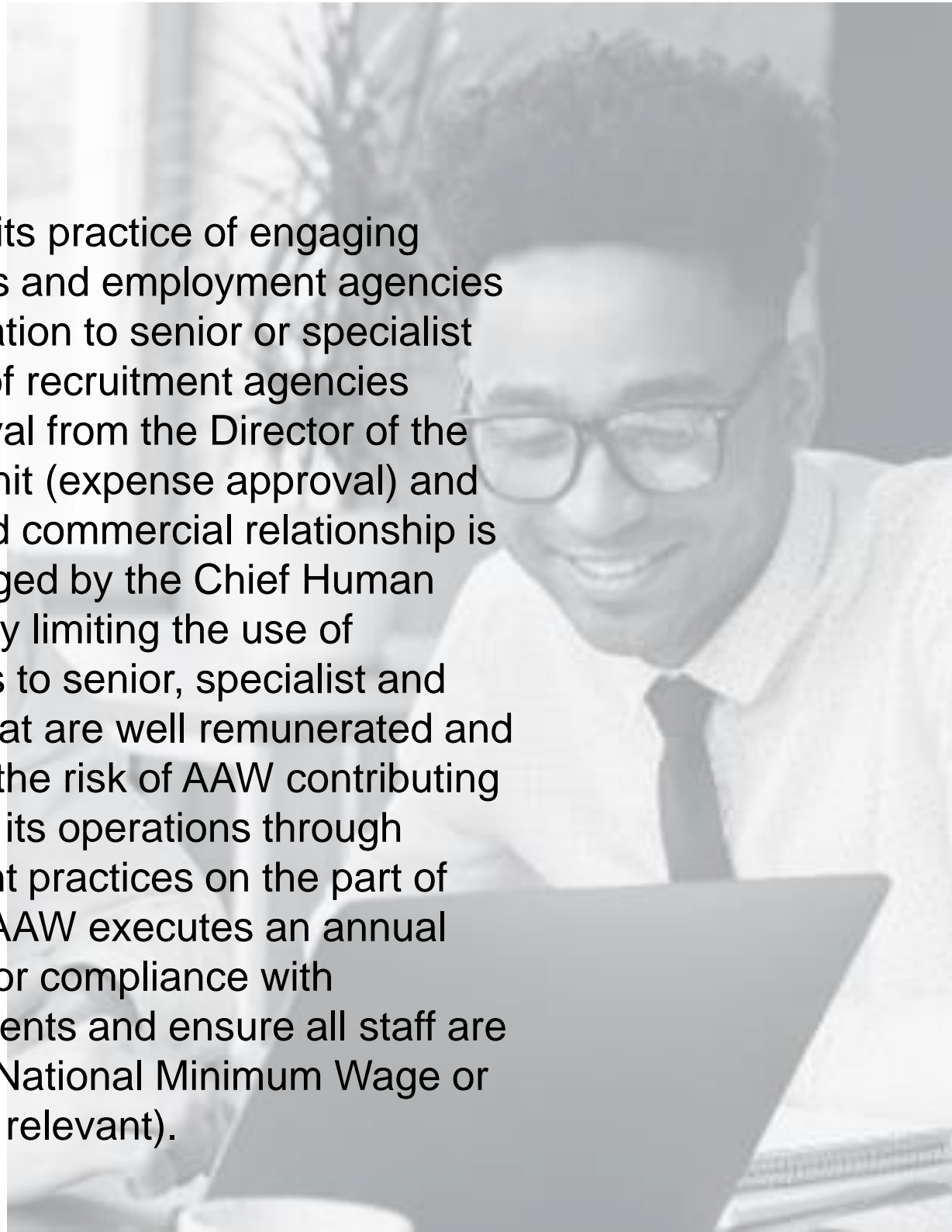
Our Employee Handbook is a valuable tool for developing, strengthening, and changing our organization's culture, and it reflects our commitment to the promotion and protection of human rights based on the principles of dignity, equality, and mutual respect. It includes standards, policies, and employee expectations, in order to comply with Australian and New Zealand workplace regulations. We amended the Employee Handbook this reporting year to incorporate information regarding modern slavery and AAW's commitment to tackling the risks of modern slavery in its operations and supply chains.

Culture and Pulse surveys

Employee surveys serve as a potent tool for cultivating a positive work environment, refining organisational processes, and ensuring that employees feel acknowledged and valued. They foster a culture of continuous improvement, allowing organizations to adapt to the evolving needs and expectations of their workforce. In late May 2023, a comprehensive staff survey was distributed to all employees in Australia and New Zealand. The primary objectives were to gather feedback on the company's workplace culture, overall employee satisfaction, and to assist AAW in identifying and addressing potential risks such as gender disparity, harassment, coercion, bullying, control, or exploitation within our operations. The survey results, gauged through average satisfaction and net promoter scores, highlighted an overall positive workplace experience as indicated by the respondents. While affirming the positive aspects, the survey also identified areas for improvement—acknowledging that, like any organisation, there are pockets of individuals or teams whose employment experience could be enhanced due to various local and broader organisational factors. It's noteworthy that the survey responses did not reveal any urgent action items. This proactive approach to feedback underscores AAW's commitment to continuous enhancement, ensuring a workplace that not only meets but exceeds the expectations of its diverse workforce.

RECRUITMENT

AAW has continued its practice of engaging recruitment providers and employment agencies predominantly in relation to senior or specialist roles. Engagement of recruitment agencies requires prior approval from the Director of the relevant Business Unit (expense approval) and agency selection and commercial relationship is approved and managed by the Chief Human Resources Officer. By limiting the use of recruitment agencies to senior, specialist and difficult-to-fill roles that are well remunerated and skilled, this reduces the risk of AAW contributing to modern slavery in its operations through deceptive recruitment practices on the part of recruitment agents. AAW executes an annual salary audit to monitor compliance with employment agreements and ensure all staff are receiving above the National Minimum Wage or Award Wage (where relevant).



INTERNSHIP

AAW has established relationships with several Australian tertiary institutions, periodically offering internships to students, and has historically provided work experience to high school students. In these circumstances, students are engaged under the terms and conditions set by their university or the relevant Education department. Interns who are observing and learning as part of a student or vocational placement are ordinarily not paid, however interns who are undertaking productive work and delivering a commercial benefit are remunerated, consistent with Australia's workplace laws. Throughout the reporting period, AAW did not engage in the provision of internships or work experience placements.

Visits To Outsourced Team in The Philippines

This reporting year, representatives from our Australian offices undertook a series of visits to our service providers in Manila, Philippines, fostering engagement through a variety of activities. These visits included comprehensive training sessions encompassing both general and specific user training, ensuring that our teams are well-equipped with the necessary skills and knowledge. Additionally, our teams received valuable IT assistance to enhance their technological proficiency. Beyond skill development, we also dedicated time to conduct a thorough review of the working conditions at the Manila offices, prioritising the well-being of the staff. It's worth noting that each aspect examined during these visits surpassed the established standards, reflecting our commitment to maintaining high-quality working environments. Looking forward, we are willing to continue this collaborative and supportive approach, with plans for the next site visit scheduled for the second half of 2023. This ongoing engagement underscores our dedication to fostering positive relationships, ensuring the well-being of our teams, and maintaining excellence in our operational standards.

ISO 9001 Quality Management System

We proudly hold ISO certification, a testament to our commitment to quality management. This recognition underscores our dedication to consistently delivering products/services that meet high standards and customer expectations. It reflects our adherence to best practices, continuous improvement, and a systematic approach to ensuring top-notch quality in all facets of our operations.

In addition, our ISO certification establishes essential processes and procedures that support AAW in various aspects. These include measuring compliance with the Modern Slavery Act, assessing procurement procedures, evaluating risks, and ensuring a continual commitment to addressing modern slavery issues. The ISO framework further enables us to effectively gauge the impact and success of our actions in these crucial areas.

Australian Trusted Trader

AAW is an accredited Australian Trusted Trader, which means we continually take steps to ensure we meet the qualification criteria of the Customs Amendment (Australian Trusted Trader Program) Rule 2015, and complete annual declarations to confirm this. Relevantly in the context of modern slavery, we:

- Have physical security measures in place to control access to goods stored, and secure the goods against unauthorised movement, alteration, or interference during movement of the goods into or out of our premises and while goods are stored in those premises; and
- Have measures in place to keep goods secure and prevent alteration or interference during transportation and reconcile goods moved into or out of our premises with commercial or other documentation.

Actively identify and address specific vulnerabilities or risks to our international supply chain and take measures to mitigate and review the vulnerabilities and risks through a security risk assessment.



9. Due Diligence

- Policy Development:

In our ongoing commitment to uphold AAW's ethical standards and business integrity, we consistently evaluate and refine our internal processes and policies.

- Risk Assessment:

AAW conducts a Supplier Risk Assessment, employing a systematic evaluation process to assess and manage potential risks linked to its suppliers. The primary objective is to identify and understand the various risks that could impact the supply chain, business operations, and overall performance. This process also underscores our unwavering commitment to ethical and sustainable business practices

- Supplier Screening:

All of our suppliers are required to comply with applicable laws and regulations, including the Modern Slavery Act, as well as policies and standards governing ethical business practises, safety, and the environment.

- Contractual Obligations:

AAW has agency agreements with our strategic partners, and offshore processing services, and prior to entering into these agreements, it conducts financial, human resource, and regulatory due diligence. These agreements include clauses that explicitly prohibit modern slavery.

AAW has vendor agreements with overseas and local suppliers that have been modified to include specific references to the vendor(s)' working conditions or concerns about modern slavery. This form is given to all new vendors.

- Recruitment Practices:

We follow our responsible recruitment practices, which include stringent pre-employment checks for all employees, such as background checks, employment history, and confirmation of appropriate work rights.

We engage reputable labour hire agencies and follow the same process before engaging new hires, in which we identify the type of work to be outsourced, check against relevant Awards, and ensure individuals are remunerated in accordance with the relevant Award; if the Award is not applicable, we review current market rates to ensure individuals are paid a competitive rate when compared to their peers

Our suppliers are obligated to ensure that all employees and contractors working for them are legally allowed to work and that no forms of slavery or human trafficking are visible in the products and services they provide to AAW.

10. Training of Staff

Providing modern slavery training to our employees serves several crucial purposes within our organization:

Awareness and Understanding: The training increases awareness among our staff about the existence and complexities of modern slavery. It ensures that employees understand the various forms of exploitation, contributing to a more informed and vigilant workforce.

Human Rights Education: The training helps educate employees on human rights principles, emphasizing the importance of respecting and protecting the rights of individuals. This knowledge is fundamental in fostering a workplace culture that upholds ethical standards.

Risk Mitigation: By educating our staff about modern slavery risks, we empower them to identify and address potential issues within our operations and supply chain. This proactive approach contributes to risk mitigation and aligns with our commitment to responsible business practices.

Organizational Culture: Providing modern slavery training helps shape a corporate culture that prioritizes ethical considerations. It sends a clear message that we are dedicated to creating a workplace environment that values human rights and actively opposes any form of exploitation.

New Hire Integration: Incorporating the training into the induction and probation period for new hires ensures that ethical standards are communicated from the beginning of their tenure. This helps in embedding responsible practices within the organizational culture.

Overall, modern slavery training is a proactive measure to equip our workforce with the knowledge and tools needed to contribute to the prevention of modern slavery, aligning with our broader commitment to ethical business conduct.



To ensure that 100% of employees undergo modern slavery training at the time of their induction.

11. Monitoring and Reporting

Our efforts to prevent modern slavery continue, with the working group meeting on a regular basis throughout the reporting period. The initiative is still fully supported by the policy owners, finance team, Group Risk & Compliance Manager, Chief Human Resource Officer, and Chief Financial Officer.

AAW has defined a framework that includes metrics that will allow the Company to track the effectiveness of its due diligence actions and report on our impact during the reporting period. Furthermore, modern slavery reporting is included as a standing agenda item at every board and executive meeting.



12. Assessing the Effectiveness of our actions

AW is fully committed to upholding the Modern Slavery Act to combat modern slavery. We acknowledge the challenges associated with measuring the effectiveness of our actions, however we are fully committed to continuous improvement. The approach that we use to assess the effectiveness of our actions is shown in the table below.

Governance Framework

- Annual review of our People and Safety policies.
- A maturity assessment of our policies, systems, and controls, as well as our grievance mechanisms and remediation processes.
- Completion rates for awareness training.

Risk Management

- Risk-based approach to assessing the risks of modern slavery by reviewing our business operations, procurement practises, and Tier 1 Suppliers, taking into account their geographical location, nature of goods and services supplied, and annual spend level;
- Total number of suppliers who have incorporated anti-modern slavery practises into their operations;
- Analysis of responses to supplier questionnaires;
- Analysis of responses to our Culture and Pulse Survey;
- Consultation with experts in the field to understand our obligations;
- Implement strategies to assess and address risks of modern slavery and also assess the effectiveness of our actions;

Grievance Mechanisms

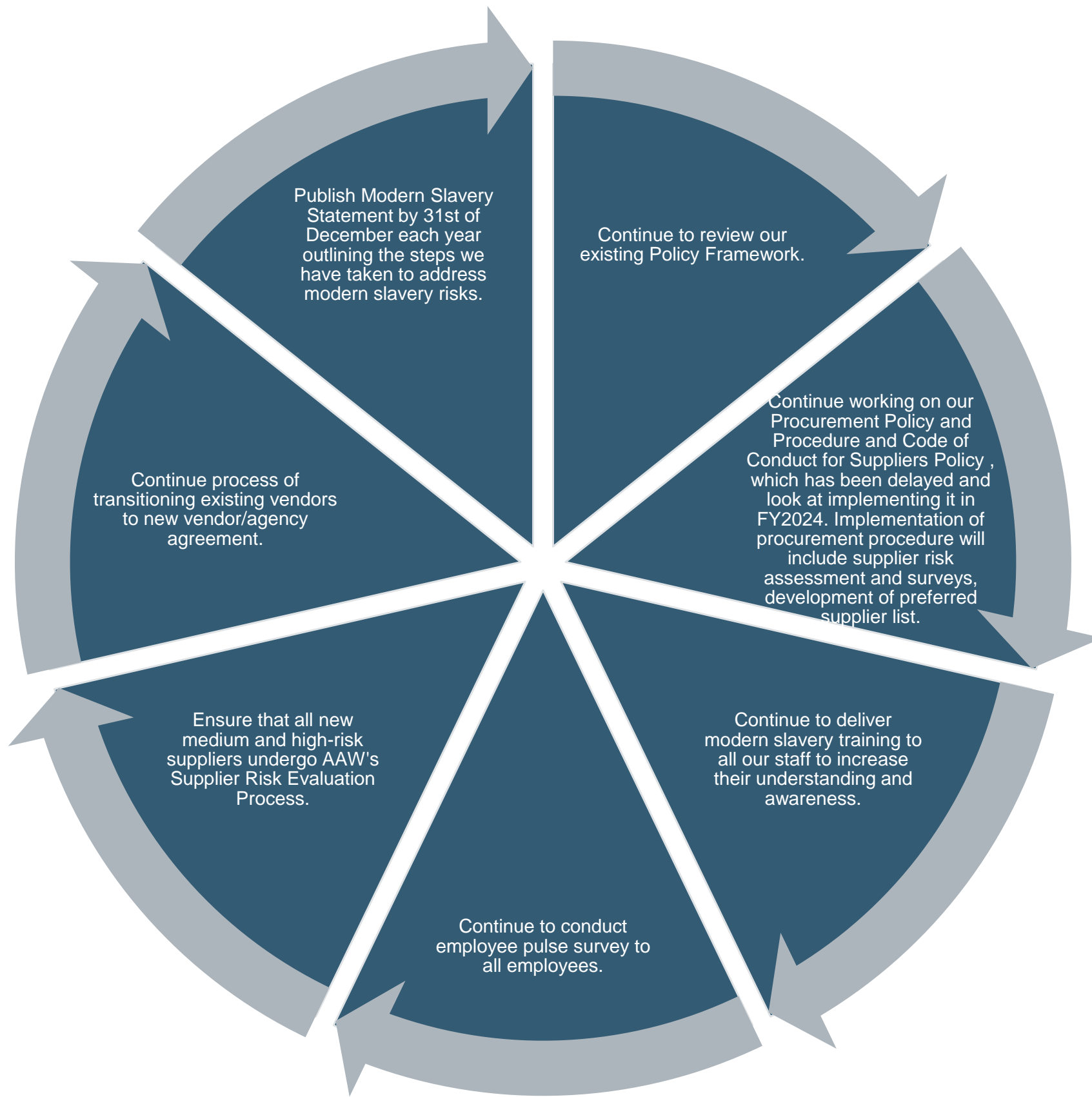
- Regular reporting on the total number of issues raised and resolved.

Monitoring and Reporting

- Regular reporting on the total number of sites visits (strategic partners, offshore business services, key suppliers);
- Quarterly reporting to the Executive Team and semi-annual reporting to the Board of Directors;

TABLE 1 AAW's framework for evaluating the efficiency of our actions

13. Continuous Improvement



14. Consultation

AAW operates as an integrated group, guided by comprehensive policies and procedures designed for universal application across all entities. Following this structure, our consultation process involved interaction with:

- Our Modern Slavery working group, which consists of representatives from Finance, Human Resources, Procurement, and Risk and Compliance. These members act as shared resources, collaborating across the entities and business groups identified in this statement under the heading “Our Structure and Operations”.
- Each of the entities owned and controlled by AAW.

This statement underwent collaborative preparation through consultations with each subsidiary and controlled entity it covers (AAW Global Logistics Pty Ltd, also trading as AAW Project Logistics and its wholly owned subsidiaries include AAW Bulk Liquid Logistics Pty Ltd; Coastalbridge Pty Ltd; Regional Shipping Services Pty Ltd, also trading as PIL Logistics Australia; and the joint venture Hoyer Logistics Australia Pty Ltd).

***This statement was prepared in consultation with each subsidiary and controlled entity covered by it, and it was reviewed and approved by the Board of Directors on December 18, 2023.



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