



TASMAN LOGISTICS
SERVICES



Modern Slavery Statement FY 23-24

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Overview: How we have addressed the mandatory reporting criteria

The Australian Modern Slavery Act 2018 (Cth) establishes mandatory reporting criteria for reporting organisations. The table below outlines where in this statement we have addressed the mandatory reporting requirements under the Act:

Mandatory reporting criteria		Section in this statement	Page number
Mandatory Reporting Criteria 1 & 2	Identify the reporting entity and describe its structure, operations, and supply chain.	1. Reporting entities and operations 2. Our operations and supply chain	5 - 8
Mandatory Reporting Criteria 3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls.	3. Supply chain risk assessment 4. Risks of modern slavery in our operations and supply chain	9 - 10
Mandatory Reporting Criteria 4	Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	5. Actions taken during the reporting period	11 - 12
Mandatory Reporting Criteria 5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	6. Assessing the effectiveness of our response	14
Mandatory Reporting Criteria 6	Describe the process of consultation with any entities the reporting entity owns or controls. (Only applicable to joint statements).	7. Consultation	15
Mandatory Reporting Criteria 7	Any other relevant information	8. Our future actions	16



Highlights of FY 2023-24



17

Key personnel trained



Established modern slavery governance structure



3

Policies and procedures updated



Zero

Modern slavery complaints



631

Suppliers assessed



Supplier questionnaire developed



1. Reporting entities and operations

Tasman Logistics Services Pty Ltd (TLS) (ABN: 37 103 193 979) is an Australian organisation that is privately owned and operates under the control of the Tasman Global Group Pty Ltd (ACN : 672 682 094). As the Tasman Global Group does not directly engage in any business activities, this statement is submitted by Tasman Logistics Services. This is TLS’s second consecutive modern slavery statement, with an annual revenue exceeding the threshold of \$100 million in the reporting year.

TLS specialises in providing comprehensive transport and logistics solutions, including warehousing and storage services, provided to clients across Australia. The company is registered at 513 Mt Derrimut Rd, Derrimut VIC 3030, and does not own or control any other business entities.

This statement is published in compliance with the Modern Slavery Act 2018 (Cth) (the Act) and outlines the steps the company has undertaken to identify, assess, mitigate, and remediate modern slavery risks in its operations and supply chains during the financial year ending 30 June 2024 (FY24). All amounts stated in this statement are in Australian dollars unless otherwise indicated.

TLS’s business activities span across Australia, offering a wide range of logistics solutions tailored to meet diverse needs. The main business activities of TLS include:



Trans-Bass forwarding in Tasmania, ensuring seamless and efficient transportation across the Bass Strait.



General warehousing and storage services offer secure and flexible options for inventory management.



Local full load transport services, catering to various freight requirements within states.



Contract logistics (3PL, 4PL), providing end-to-end supply chain solutions that enhance operational efficiency.



Interstate full load and pallet load services for broader reach across Australia.



Project logistics, where we manage complex logistics requirements for large-scale projects, ensuring timely and cost-effective delivery.



2. Our operations and supply chain

2.1 Our operations

TLS operates multiple transport, warehousing, and logistics facilities across Victoria, Queensland, New South Wales, South Australia, and Tasmania. Specifically, we have five sites dedicated to transport, warehousing, and logistics operations in Victoria, one in Queensland, one in New South Wales, one in South Australia, and one in Tasmania. Additionally, we operate a repair workshop in Yarraville, Victoria, and a Trans-Bass forwarding facility in Invermay, Tasmania. All our warehouses, workshops, and service facilities are leased.

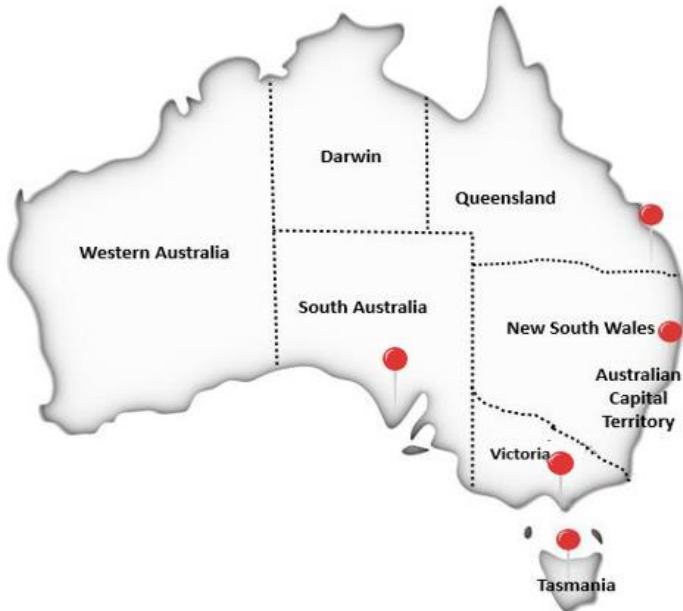


Figure 1: Our Presence

In FY24, TLS employed permanent workforce across these facilities consisted of 369 employees, with a composition of 308 males and 61 females. The company also directly engaged 155 non-permanent male workers through seasonal and contract arrangements. Furthermore, we relied on an additional 71 temporary workers (66 males and 5 females) provided through external labour hire agencies.



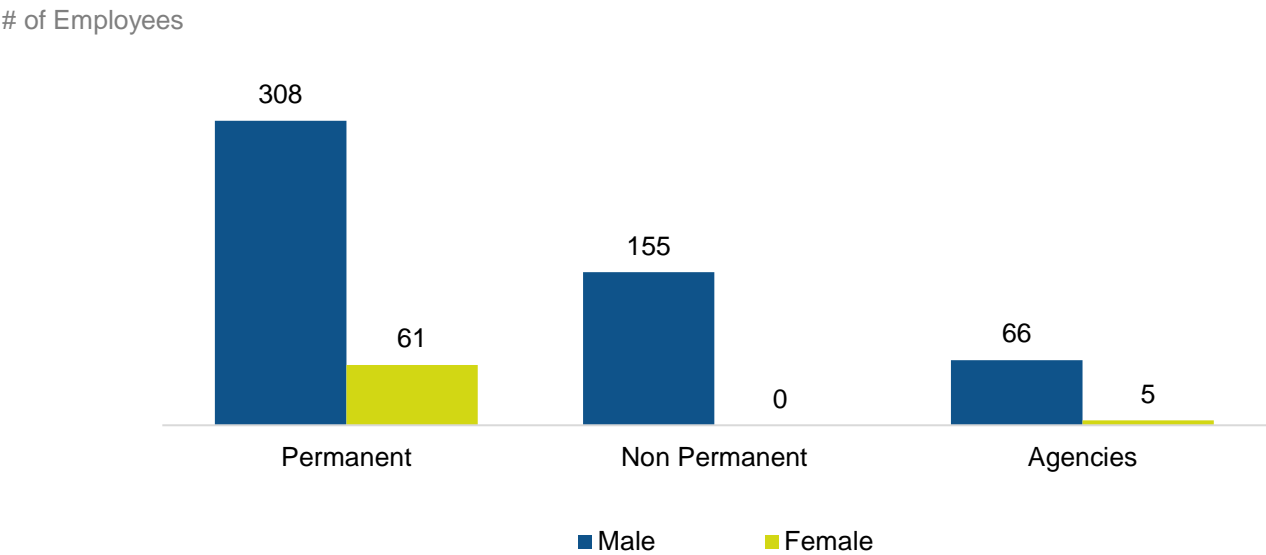


2.2 Workforce overview

The "Employee Overview: FY24" chart provides a detailed breakdown of the workforce composition at Tasman Logistics across three categories:

This section details the workforce composition at Tasman Logistics, categorised into three distinct groups: permanent employees, agency workers, and the overall workforce. It provides insights into the distribution of roles, gender representation, and the nature of work performed within each category. The analysis highlights the balance between stable, long-term roles and the flexibility offered by agency employment, along with the associated risks and opportunities for improvement in workforce diversity and ethical practices.

Figure 2: Employee Overview : FY24



Permanent

There are 308 permanent male employees and 61 permanent female employees. The significant number of permanent employees suggests a stable workforce with potentially lower risks of modern slavery, as permanent employment typically offers better job security and legal protections. The employees in this category primarily involves general management, operations managers, compliance, fleet controllers, mechanics, permanent drivers, sales team, finance team and administration.

Non-Permanent

The non-permanent workforce can be associated with higher risks of modern slavery due to the temporary nature of their employment. Temporary workers often face greater vulnerabilities, such as job insecurity, and less protection under labour laws. However, we strictly adhere to all applicable employment laws in Australia. The workers in this category primarily are the sub-contractor drivers.

Agencies

The company has engaged with 18 agencies, employing 66 male and 5 female employees. Agency workers are often at higher risk of exploitation, as they might be subject to less stringent oversight and protections from the company compared to directly hired employees. This category requires careful scrutiny to ensure that labour practices comply with modern slavery regulations and ethical standards. The nature of work in this category primarily involves warehouse labour, forklift drivers and reach stacker drivers.



2.3 Our supply chain

In FY24, we engaged 631 suppliers to support our nationwide operations. Our supplier spent in FY24 was \$102.9 million. As mentioned in Figure 3, our spending has been primarily in the Transportation sector, which accounted for 86.61% of the total expenses.

Sector, industry or purchase category	# of Suppliers
Tyres	23
Maintenance and repair of motor vehicles	156
Transportation	385
Recruitment & hiring	18
Warehousing	6
IT Services	43

All tier 1 suppliers engaged were based in Australia, however we recognise that their supply chains likely extend overseas and that our extended supply chain is likely to have modern slavery risks.

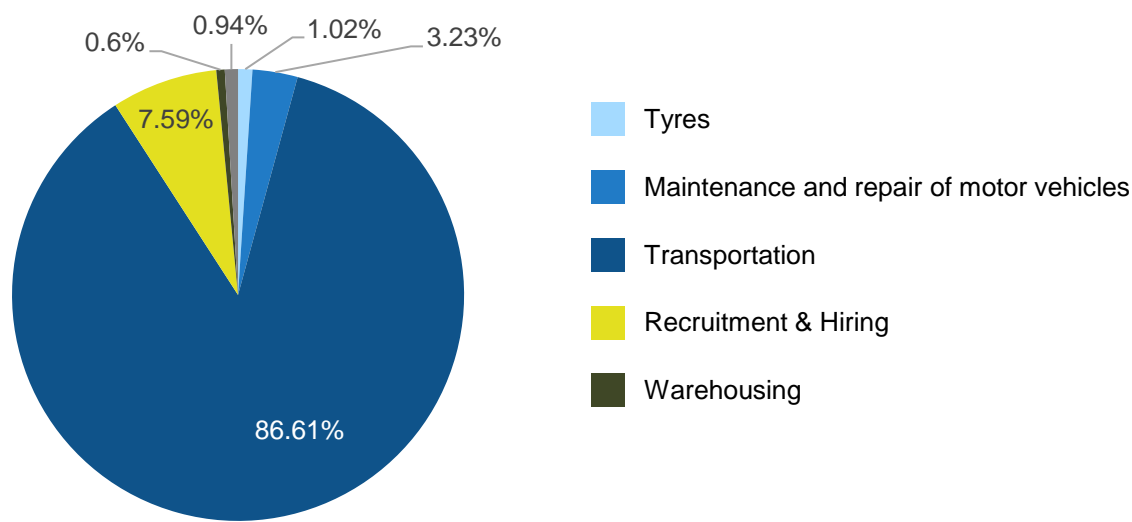
\$102.9 Million
Annual Procurement Spent

100%
Suppliers are either local Australian companies or multinational corporations

We engaged a range of products and services providers categorised under tyres, maintenance and repair of motor vehicle, transportation, warehousing, recruitment and hiring and information technology. Maintenance and repair of motor vehicles represented 3.2% of the spending, reflecting our commitment to fleet upkeep, while recruitment and hiring made up 7.59% as we invested in a skilled workforce. Tyres expenses constituted 1.0% of the total, supporting fleet safety, and warehousing costs were 0.6%, aligning with our storage needs. Additionally, IT services accounted for 0.9%.

All our subcontractors operate under long-term service contracts, ensuring greater stability in supplier relationships and establishing a foundation for proactive engagement in addressing modern slavery risks.

Figure 3: Supplier categories by spent









3. Supply chain risk assessment

We carried out an inherent risk assessment of our supply chain by prioritising key categories of our direct suppliers as outlined below. This targeted approach allowed us to more effectively identify and address modern slavery risks within our operations.

Sector and industry risks Consider whether there is a high prevalence of modern slavery in the particular industry or sector.	Product and services risks Consider whether there is a high prevalence of modern slavery associated with the particular good or service
Geographic risks Consider whether there is a high prevalence of modern slavery in the location that the production or service is sourced or produced from	Supply chain model risks Consider whether the nature of the supply chain model likely to be involved carries a greater risk of modern slavery

Our risk assessment follows a three-step process that uses a scoring system to classify risk levels across several factors.

Step 1	Step 2	Step 3
 Identify high-risk sectors Certain industries are more prone to modern slavery risks.	Risk level classification	Guidelines for score thresholds
 Analyse spending Higher spend in high-risk sectors may indicate greater exposure.	Low = 1	Overall score 1-4: Low risk
 Supplier count - A larger number of suppliers can indicate complexity and potential for risk.	Medium = 2	Overall score 5-8: Medium risk
 Geographical risk Although all suppliers are from Australia, there may still be inherent risks within specific sectors.	High = 3	Overall score 9-12: High risk



4. Risks of modern slavery in our operations and supply chain

During the reporting period we carefully assessed the extent to which our operations and supply chains may contribute to or be linked to modern slavery risks. Our evaluation revealed several key factors, as below:

- 1. Direct operations:** As an Australian-based company operating exclusively within Australia, our logistics operations are governed by stringent national labour laws and regulatory frameworks, significantly mitigating the risk of modern slavery. Furthermore, our workforce is employed under formal contracts, ensuring transparency and strict adherence to ethical employment practices.
- 2. Tier 1 suppliers:** All of our direct suppliers are large local Australian companies or multinational corporations subject to modern slavery laws.
- 3. Supply chain risks beyond tier 1:** Although most suppliers are based in Australia, we acknowledge that their products and components may originate from countries with higher modern slavery risks.
- 4. UNGP analysis:** Our evaluation, based on the UNGP categories (cause, contribute, directly linked) indicates TLS may be directly linked to modern slavery risks through its supplier business practices.
- 5. Other direct procurement categories:** Our risk assessment identified that certain modern slavery-linked practices could be present in the following categories:-
 - a) Tyre Suppliers:** Our key tyre suppliers have strong anti-modern slavery policies and the Australian tyre industry poses a low risk. Our inherent risk assessment using UNGP’s principles indicated that TLS might be *directly linked* due to the inclusion of natural rubber—often sourced from regions with known labour exploitation risks—introduces a medium inherent risk at deeper tiers of the supply chain.
 - b) Recruitment Practices:** Modern slavery risks in the context of recruitment agencies often arise through exploitative labour practices, such as debt bondage, withholding wages or forced labour in cleaning services. Our inherent risk assessment through the lens of UNGP indicated that TLS might be *directly linked* to modern slavery in the supply chain particularly for migrant workers hired through agencies.
 - c) Vehicle Maintenance Sector:** The motor vehicle maintenance sector is exposed to modern slavery risks, including unregulated work arrangements, subcontracting, and hidden exploitative practices within supply chains. Applying the UNGP framework highlights that TLS may inadvertently *directly linked* to these risks through third-party service providers. This sector faces medium-to-high modern slavery risks, particularly due to the vulnerability of migrant workers and the high-risk nature of certain products, such as tyres and consumables, used in the industry.
 - d) Warehousing Sector:** The warehousing sector faces significant modern slavery risks, including exploitative labour practices such as excessive working hours, underpayment, and poor working conditions, often affecting vulnerable groups. These risks are heightened by the use of third-party labor hire agencies, which may not comply with ethical recruitment standards. Applying the UNGP framework reveals that TLS may *be directly linked* to such risks through reliance on subcontractors. However, our spend on warehousing is less than 1% of overall procurement spent, making it less significant.

United Nations Guiding Principles on Business and Human Rights

Cause

Contribute

Directly Linked

Overall, we predominantly procure goods and services within Australia, resulting in a low risk of modern slavery in our direct procurement. Additionally, our comprehensive employment policies and practices provide robust safeguards, reinforcing our commitment to mitigating modern slavery risks within our direct operations.

However, the global nature of manufacturing introduces potential exposure to modern slavery risks within Tier 2 and Tier 3 suppliers in our supply chain. Further assessment of these suppliers forms a key component of our future mitigation strategy.



5. Actions taken during the reporting period

During the reporting period, the company undertook the following actions to better assess and address potential modern slavery risks in our operations and supply chain:

Action 1:

Development of supplier due diligence framework: In our FY23 Modern Slavery Statement, which marked our first statement, we outlined our commitment to establishing a supplier assessment framework. We are pleased to confirm that we have made significant progress in this area, as detailed below. This framework is designed to systematically assess suppliers across key risk indicators, helping us identify, manage, and mitigate potential modern slavery risks within our supply chain. In FY24, we began implementing this framework by focusing on steps 1 and 2. Our intention is to further refine and fully operationalise the framework in subsequent phases, ensuring continuous improvement and effective risk management.

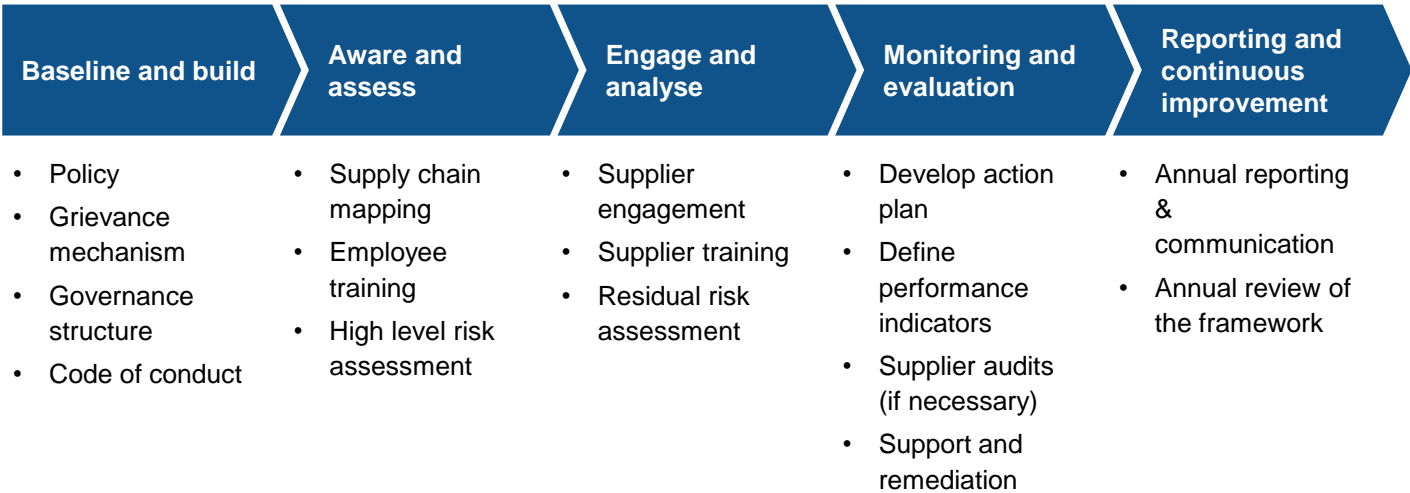


Figure 4 : Our supplier assessment framework

Action 2:

Modern slavery training: In FY24, 17 employees at Tasman Logistics successfully completed Modern Slavery training, encompassing key leadership and management positions, including the Managing Director, CEO, CFO, COO, CTO, State Managers, General Managers, and Site Managers. The training was delivered online through our learning management platform and covered critical topics such as the fundamental awareness, types of modern slavery, the UN Guiding Principles (UNGPs), modern slavery risks within the transport and logistics sector, the Commonwealth Modern Slavery Act 2018, and proactive strategies to combat modern slavery.



5. Actions taken during the reporting period (cont.)

Action 3:

Supplier Assessment Questionnaire (SAQ): We developed a supplier questionnaire to ensure compliance with the Act and uphold high anti-slavery and human rights standards. This first SAQ requires suppliers to confirm fair wages, lawful working conditions, and accessible contracts. It evaluates their awareness of the Act, due diligence, training, and accountability measures; while ensuring they do not engage in coercive employment practices.

Action 4:

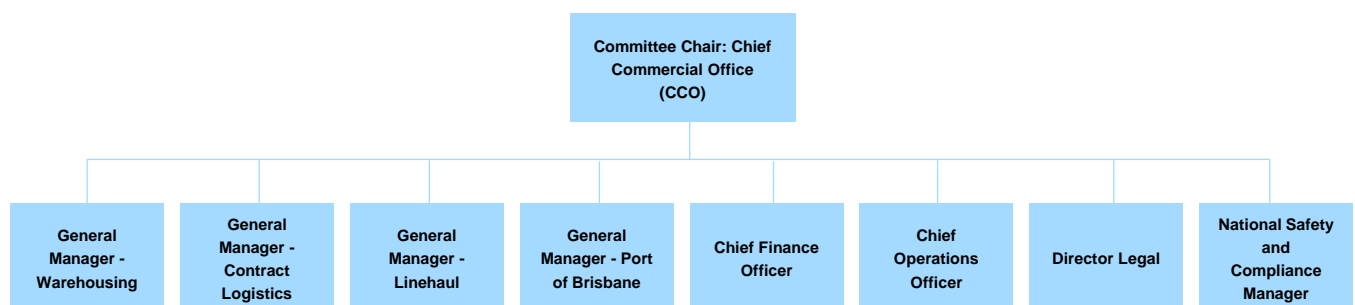
Supplier risk assessment: We conducted an inherent risk assessment of all our 631 direct suppliers using a risk score approach, identifying Transportation and Warehousing as medium-risk categories due to outsourcing, limited visibility over subcontractors, and reliance on temporary labour. Recruitment and hiring, as well as IT services, were assessed as low risk, being managed through reputable agencies and established Australian providers with robust anti-slavery policies. Overall, the direct supply chain presents a low risk of modern slavery, reflecting controlled practices and strong supplier standards. The outcome of the inherent risk assessment is available below:

Number of suppliers	Risk Level	Supplier Category
570	Medium	<ul style="list-style-type: none"> • Tyres • Maintenance and repair • Transportation • Warehousing
18	Low to medium	<ul style="list-style-type: none"> • Recruitment and hiring
43	Low	<ul style="list-style-type: none"> • IT Services

Action 5:

Governance structure: We established a robust governance structure where the responsibility for ongoing monitoring, assessment, and mitigation of modern slavery risks within our operations and supply chain is jointly overseen by senior leaders from the executive team. This Management Review Committee, led by the Chief Commercial Officer, comprises senior business leaders, as illustrated in figure 5 below-

Figure 5: Our governance structure





5. Actions taken during the reporting period (*cont.*)

Action 6:

Policy Development: During the reporting period, we updated key policies to strengthen our approach to modern slavery compliance and governance.

- i. **Comprehensive Modern Slavery Policy:** Updated existing modern slavery policy to align with the Modern Slavery Act 2018, the policy reinforces a zero-tolerance stance on modern slavery, enhances risk identification processes, and strengthens due diligence practices across employees, suppliers, and contractors.
- ii. **Whistleblower Policy:** The Whistleblower Policy, introduced in conjunction with the Modern Slavery Policy, establishes strong controls, clear reporting channels, and robust protections for whistleblowers. The policy strictly prohibits any form of retaliation against individuals who raise concerns, while offering essential protections, including access to support services such as counselling and legal assistance.

Both policies have been operationalised through the company's *SharePoint* platform and shared with the key stakeholders. This rollout is reinforced through employee training programs and governance oversight by the Management Review Committee and Board, ensuring ethical practices and accountability across the organisation.

Action 7:

Developed Contractual Controls: We developed contractual controls within our subcontractor agreement to strengthen modern slavery prevention. These provisions require subcontractors to actively identify, mitigate, and report any modern slavery risks within their operations, ensuring compliance with the Modern Slavery Act 2018 and other relevant laws. Subcontractors must promptly notify TLS of any suspected breaches and undertake remedial actions as directed. The agreements also empower TLS to conduct audits to verify compliance, with subcontractors required to provide full access to personnel information, and premises. In instances of non-compliance or failure to implement corrective measures, TLS reserves the right to terminate the contract. While we have developed these controls in FY24 these contractual amendments will be executed in FY25.





6. Assessing the effectiveness of our response



TLS evaluates the effectiveness of its actions to prevent and address modern slavery risks within its operations and supply chain. This assessment ensures continuous improvement and accountability in implementing our modern slavery policy and related due diligence practices.

1. **Key Performance Indicator (KPI):** In FY23, we lodged our first Modern Slavery Statement, marking the beginning of our work in addressing modern slavery risks. This progress has continued into FY24, during which we established two key performance indicators (KPIs) to guide and measure our ongoing efforts:
 - a) **Remediation:** During FY24 there were no incidents or issues were identified or brought to the attention of senior management.
 - b) **Modern slavery awareness level:** During the reporting period, we ensured the active participation of all relevant personnel and key function representatives in Modern Slavery training. A total of 17 key employees, including senior leadership and management roles such as the Managing Director, CEO, CFO, COO, CTO, State Managers, General Managers, and Site Managers, successfully completed the program. Feedback from the training indicates a significant improvement in participants' understanding and awareness of modern slavery risks, demonstrating the effectiveness of the initiative.
2. **Gap assessment against compliance and industry standards:** A gap assessment was conducted to evaluate how existing modern slavery policies aligned with the requirements of the Modern Slavery Act, identifying any areas where policies fell below required industry standards. As a result, we introduced comprehensive modern slavery and whistleblower policies.
3. **Policy effectiveness and operationalisation:** We ensured that the Modern Slavery Policy and the Whistleblower Policy were duly implemented and made operational by hosting them in accessible locations and providing clear communication to facilitate their easy access for all relevant stakeholders.




7. Consultation

TLS does not own or control any other entities to involve in the consultation process. However, in collaboration with an external consulting firm, we conducted a comprehensive internal consultation to review policies and processes related to modern slavery, and the content and structure of this statement. As part of this review, all relevant policies, including the Supplier Code of Conduct and training materials, were assessed by key departments to ensure alignment with our business strategy and modern slavery commitments.

Inputs were gathered from essential internal teams, including the management review committee, legal, finance, business development, operations, safety and compliance, and human resources, ensuring that all relevant personnel actively contributed to this critical consultation. Following this collaborative process, the statement was reviewed and approved by senior management to ensure full compliance with company policies and the Modern Slavery Act before publication.

8. Our future actions

We are committed to the continuous improvement and development of our modern slavery risk management activities. Our future aims for FY25 and beyond include:



Modern slavery training

We plan to extend Modern Slavery training to all our line managers, team leads as well as to our top and high-risk suppliers, ensuring comprehensive awareness and compliance across our organisation and supply chain.

Supplier engagement and assessment

To strengthen our approach to addressing modern slavery, we will engage with major suppliers to assess their awareness and compliance with the Modern Slavery Act. As part of this effort, a 'Supplier Assessment Questionnaire' will be rolled out to our top suppliers in the next financial year. This questionnaire will focus on their labour practices, modern slavery policies, and risk mitigation measures, ensuring adherence to ethical labour standards and supporting ongoing monitoring and compliance initiatives.

Establishing KPIs

We are committed to developing and implementing targeted KPIs in the next financial year to strengthen our monitoring and performance in this area.

Prioritise and focus on high-risk sectors

Increase understanding of the extended supply chain across different procurement categories, focusing initially on high-risk categories like tyres and warehousing.

Contractual Controls

In FY24 we developed contractual obligations requiring our suppliers to commit to mitigating modern slavery risks. These controls will be incorporated into third-party contracts, effective from FY25.

Communicating the Whistleblower Policy

Exploring effective ways to share the company's whistleblower policy and complaint mechanism with suppliers who are considered high risk.

We acknowledge that modern slavery is a complex challenge, we welcome the opportunity to promote safe and fair work for all people and will endeavour to continuously improve our practices over time, alongside our suppliers.



9. Approval and signature

This statement is signed by Ivan Vanis in his role as the Chief Executive Officer of Tasman Logistics Services Pty Ltd on 17/12/2024

A handwritten signature in black ink, appearing to be 'Ivan Vanis', located below the text of the statement.

This statement was approved by the Board of Tasman Logistics Services Pty. Ltd. on 17/12/2024



Thank you