








Introduction

This Modern Slavery statement is prepared and presented by Northline Partnership (Northline) pursuant to the Commonwealth of Australia Modern Slavery Act 2018 (the Act).

The 2018 Global Slavery Index continues to support the fact that modern slavery impacts more than 40 million people world-wide and that some 71% of those affected are female. The term “modern slavery” is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Specifically, the Act defines modern slavery as including the following types of serious exploitation:

-  trafficking in persons,
-  slavery,
-  servitude,
-  forced marriage,
-  debt bondage,
-  deceptive recruiting for labour services, and
-  child labour.

Northline takes a zero-tolerance approach to any form of modern slavery practices in our operations or our supply chain. Northline acts in accordance to our corporate values of “Integrity, Connected, Safety, Customer Delight and Innovation” at all times including in the development and implementation of effective systems and controls to identify, assess and eliminate modern slavery practices from within our own business units and from within third party participants in our logistics support and supply chain.

This statement is intended to meet the requirements of the Act and describes the steps taken by Northline during the financial year ended 30 June 2021.

Reporting Entity

Northline is an Australian based, privately owned and operated global logistics business. The partners of Northline Partnership are Australian companies

Structure, Operations and Supply Chain

Northline provides national and international freight management, warehousing and distribution and project logistics to a diverse customer base covering many sectors of the economy from mining and oil & gas to manufacturing and retail.

Northline was established in 1983 and currently operates 13 branches across mainland state capitals as well as key regional centres. We have connections to over 100 international agents based in countries all around the world. The company employs approximately 500 staff across Australia as well as numerous sub-contractors across all states and territories of Australia providing services to our customers.



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Northline NomineeCo Pty Ltd
as agent for Northline Partnership

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National Freight Management

- ▣ Domestic and International Freight Forwarding
- ▣ National Line-haul Network
- ▣ Premium Services
- ▣ Multi-modal

Warehousing and Distribution

- ▣ Warehouse and Distribution Services
- ▣ Variable Storage Options
- ▣ Inventory and Batch Management
- ▣ Pick and Pack Services
- ▣ RF Scanning
- ▣ Container Unloading and Loading
- ▣ Wharf Cartage
- ▣ Labour
- ▣ Planning and Flexibility
- ▣ Site and Product Security
- ▣ HACCP and AQIS Accreditation

International Freight Management

- ▣ International Network of Agents
- ▣ Import and Export Processing
- ▣ Customs Clearance
- ▣ Sea and Air Freight
- ▣ Bonded Warehousing

Project Logistics

- ▣ Mining, construction, oil and gas industries
- ▣ Feasibility Studies
- ▣ Front End Design
- ▣ Construction and Execution
- ▣ On-going Operation

Risk of Modern Slavery Practices

Northline considers that there is little risk of Modern Slavery practices within our own operations given that all our staff are employed in Australia and Northline adheres to employment legislation and applicable awards that are currently in force across the country. During the process of recruitment and subsequent induction all new employees are provided with information provided by the Fair Work Ombudsman, being the Fair Work Information Statement, which provides details about the National Employment Standards and other relevant information concerning employer and employee rights and obligations.

In addition, all employees are given access to Northline's Induction Manual which provides information on company employment policies and procedures.

Many staff are employed under a relevant Australian Industrial Award and they are advised of that upon recruitment and it is included in their contract of employment.

There is a greater risk of some of Northline's supply chain participants engaging in Modern Slavery practices.

In many cases Northline major suppliers are large multinational or Australia wide organisations with established reputations and sound business practices who have their own programs to identify and eliminate modern slavery practices from their own supply chains. A number of these organisations will present their own Modern Slavery Statement that confirms that understanding.

In relation to the international agents engaged by Northline as part of our International Freight Management processes, the company does communicate our values and expectations and actively encourages those agents to adopt industry best practice. A review of our agents standing within the international business community is also carried out prior to engagement and during the period of any ongoing relationship.

Domestically the areas of greater risk are with subcontractor drivers where Northline does not have complete visibility of the employment arrangements between the subcontractor vehicle owners and the drivers engaged by them to deliver the service. The same risk exists with certain other suppliers of domestic services such as office cleaning and the like.

Actions Taken to Address Risks of Modern Slavery Practices

Within the organisation Northline maintains a suite of policies which cover many aspects of employees relations with the company. This includes policies on Respect for People in the Workplace, and a Whistleblower Policy.

Staff are encouraged to actively comment on issues concerning the running of their departments. There is a communications strategy in place to keep people informed about what the company is doing and how various sectors fit into the operations mix. Through regular meetings between staff and management there is a two-way conduit for reviewing activities and processes to ensure that they are being conducted in an appropriate manner and without placing staff at risk. Branch staff participate in national hook ups at various levels so that there is ample opportunity for concerns to be raised and addressed.

Externally Northline adopts a number of practices to try and minimise the risk of Modern Slavery influences within the supply chain to the organisation. Suppliers are actively vetted to determine their standing within the business community and are, in many cases, provided with Northline documentation outlining the Companies values and expectations. In addition, during recruitment their liability under the Act is explained to ensure that there is a clear understanding of Northline's commitment.

For subcontractors involved in providing services which require their personnel to attend a Northline site, all new subcontractors are required to undertake a site orientation and induction briefing which includes information on Northline's policies and procedures as well as requirements under Health and Safety Legislation. Subcontractors are advised that while on site they are required to adhere to all the Northline policies and practices in place and have recourse to those policies and procedures if required, including the company Whistleblower policy.

In addition to these general measures Northline repeated an exercise first undertaken late in 2020 to reach out too many of the company suppliers and contractors to remind them of the obligations they face under Modern Slavery legislation. In November 2021 we requested that they advise Northline should they have any concerns within their own supply chains of any practices that could be construed to fall within the definition provided in the Modern Slavery Act. They were then asked to sign and return a declaration that they had undertaken such enquiries as necessary to satisfy themselves that they could meet Northline expectations of zero-tolerance to such practices.

Given the nature of the request our response rate was pleasing and an improvement over the previous period responses. None of the responses received listed any concerns that the supplier or contractor had with complying with the Modern Slavery Act 2018. A number even provided their own statements of compliance as proof of their investigations and internal policies.

Assessing the Effectiveness of Actions Taken.

Northline has been impressed by the level of engagement shown by employees, suppliers and subcontractors to the initiatives undertaken to address Modern Slavery Practices with the workplace and supply chain. Staff have and continue to provide open and active feedback to the processes in place and are open to providing ways and means to improve upon them in various instances.

Subcontractors in particular are appreciative of their ability to access and, if necessary, activate Northline's internal procedures and are also encouraged to provide feedback should they do so.

The supplier network is gradually coming around to adopting the approach of zero tolerance to Modern Slavery Practices although it is more difficult amongst the smaller operators given that they are not subject to the legislation in their own right and only through their association with larger organisation that are.

Process of Consultation with Entities Owned or Controlled by Northline

Northline Group Pty Ltd is the managing partner of Northline Partnership which conducts the business commonly known as Northline. The partnership share operational management, and as such, the aforesaid practices are applied by all partners of Northline Partnership. Partners regularly consult with each other and with the management of Northline to ensure that obligations under the Modern Slavery Act 2018 are complied with.

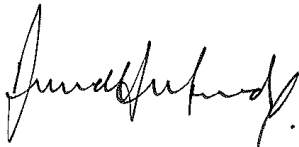
Other Relevant Information.

Northline will continue to develop policies and procedures which are in keeping with the spirit and the fact of Modern Slavery elimination.

Internally we will continue to educate our staff to be aware of such practices and be prepared to report any instances that they may discover in the execution of their duties. The company will also adapt by revising some of our standard documentation to ensure that a reference to Modern Slavery is included.

Externally we will continue to work collaboratively with our suppliers and subcontractors to assist them in assessing risks within the supply chain of Northline and the third-party suppliers. We will also actively promote the ability of organisations to inform Northline of any concerns that they may have on the matter and assist them to eradicate Modern Slavery practices that they may discover.

This statement was approved by all partners of Northline Partnership on 24 December 2021



David Harford

Director

Northline Group Pty Ltd, managing partner of Northline Partnership