

# Modern Slavery Statement 2025

For the period ended 30<sup>th</sup> June 2025

**MONDIALE VGL**  
global logistics

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This Modern Slavery Statement is prepared in accordance with the Australian Modern Slavery Act 2018 for the period 1 July 2024 to 30 June 2025 on behalf of Mondiale VGL Group Limited and its subsidiaries, including the following Australian reporting entities:

Plasia Holdco Pty Ltd  
Plasia Bidco Pty Ltd  
United Global Logistics Pty Ltd  
Mondiale VGL Pty Ltd  
MFS Logistics Pty Ltd

Mondiale VGL Group Ltd consulted with key officers of the reporting entities in the preparation of this statement. The Mondiale VGL Group Ltd Directors and the Group CEO reviewed and provided input into this statement.

Mondiale VGL has notified its global subsidiaries regarding requirements under the Modern Slavery Act and has endeavored to extend and implement similar actions and policies across the Group.

See Appendix 1 for a full list of Mondiale VGL Group Limited Australian subsidiaries.

This statement was approved by Mondiale VGL Group Limited's Board of Directors on 9 December 2025.

## Message from CEO and Chair of the Board

At Mondiale VGL, we believe that human rights are fundamental and that every individual deserves to be treated with respect and dignity, regardless of background or circumstance. As a global business, we recognise our responsibility to uphold universally accepted human rights and to contribute to positive outcomes across our operations and supply chains.

This is our sixth statement under the Australian Modern Slavery Act, and it reflects our ongoing commitment to addressing modern slavery risks. Modern slavery is a complex global issue that includes forced labour, debt bondage, human trafficking, and other forms of exploitation. We understand the important role we play in seeking to prevent and mitigate these risks, both within our own operations and throughout our supply chain.

Our approach is grounded in our values of integrity, respect, and fairness. We are committed to providing safe, secure, and non-discriminatory working environments, recognising the right to freedom of association and collective bargaining, and continually identifying opportunities to prevent or mitigate modern slavery risks

Since 2019, we have worked to identify and address modern slavery risks, continually strengthening our systems and processes. We are committed to operating in accordance with our ethical, social and environmental values and implementing suitable action accordingly. To assist in achieving this, we have implemented policies and practices that support robust compliance within our own operations and encourage our suppliers to do the same. While we acknowledge the progress made, we also recognise there is still more work ahead.

We will keep improving our due diligence and deepening engagement with our partners to aim to ensure that everyone who carries out services for Mondiale VGL – whether directly as employees or indirectly through our suppliers – is protected.

We will continue to refine our due diligence activities, enhance visibility across our supply chains and work with our suppliers to address identified risks. Our focus remains on continuous improvement as our business and operating environment evolves.



**Ray Meade**  
Group Chief Executive Officer  
Mondiale VGL Pty Limited



**Justine Smyth**  
CNZM, Chair  
Mondiale VGL Pty Limited



## Our Structure, Operations and Supply Chain

### About Us

Mondiale VGL Australia is one of Australia's largest import sea freight forwarding companies, and the Mondiale VGL Group is the largest privately owned freight forwarder in Australasia, operating an extensive global network across 60 locations in 18 countries.

For more than 40 years, our people-first approach to building relationships with clients and partners has helped us access the world's most significant trade routes throughout New Zealand, Australia, Asia, Europe and the USA.

We operate through a global network of offices, including six in New Zealand, seven in Australia, ten across Southeast Asia (Singapore, Malaysia, Vietnam, Thailand, and Indonesia), nine in Greater China (including Hong Kong, Shanghai, Ningbo, Dalian, Shenzhen, Qingdao, Xiamen, Guangzhou, and Xingang), and fifteen in Europe (Italy, Switzerland, Belgium, Netherlands, Spain, Germany, and Denmark). In addition to our wholly owned subsidiaries, we hold a minority investment in an associate business in India.

## Mondiale VGL's global operating locations



### Our Australian Structure, Operations and Supply Chain

In Australia, Mondiale VGL operates a fully integrated freight and logistics network that includes international freight forwarding, customs clearance, warehousing, domestic distribution and cartage services.

These services are delivered through a combination of owned facilities, transport assets and established subcontractor arrangements that support the movement of goods across key ports and freight corridors.

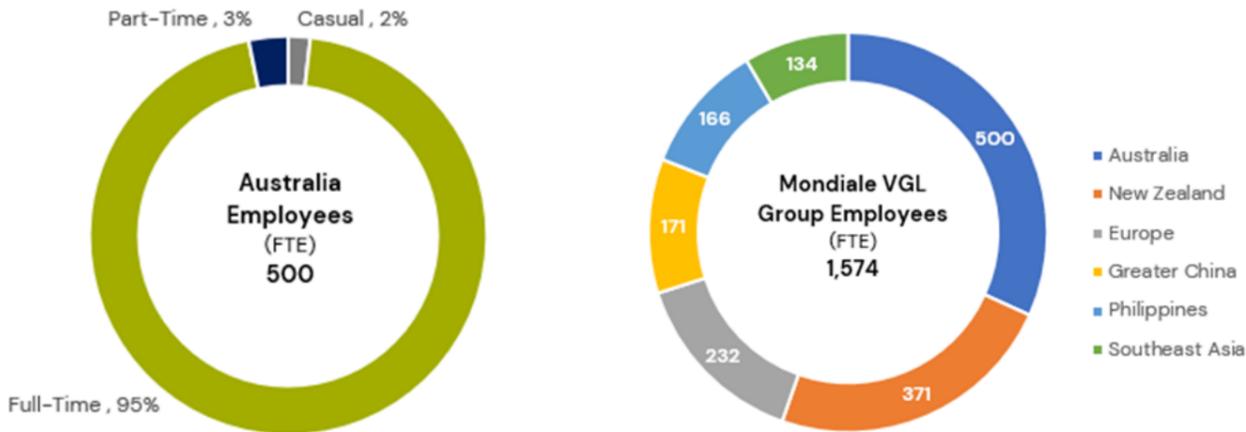
Our Australian operations are closely connected to our wider global network, which provides air, sea and cross-border freight forwarding services across New Zealand, Europe, Greater China, Southeast Asia, and the United States. This integrated model enables end-to-end supply chain solutions for customers and positions the Group to manage and monitor operational and supply chain risks across multiple jurisdictions.



# Our People

Our long-term success depends on our people, and we are committed to creating an inclusive and equitable workplace where everyone feels supported and able to thrive.

As at 30 June 2025, Mondiale VGL directly employed 1,574 people, with the majority based in Australia and New Zealand. Our workforce spans a diverse range of roles, including freight forwarding operations, transport, warehousing, customer service, sales, and corporate functions such as finance, health and safety, and people & culture.



We recognise that the strength and capability of our people are critical to delivering exceptional service to our customers and achieving sustainable growth for our business.

As a responsible employer, we respect internationally recognised human rights, uphold freedom of association and collective bargaining, and comply with International Labour Organisation standards.

We strive to provide safe, secure, and non-discriminatory working environments that celebrate diversity and foster belonging. By creating an environment where employees feel empowered to bring their whole selves to work, we unlock their full potential - driving innovation, operational excellence, and long-term success for Mondiale VGL and its stakeholders.





# Our Supply Chain

Our supply chain includes the purchase of shipping line services, as well as a wide range of products and services required for our day-to-day operations, including office supplies, employment and training of staff, labour hire agencies, cleaning services, external professional advisers, leasing of rental space, IT infrastructure and support services, and travel.

Within Australia and New Zealand, our supply chain also includes the acquisition of property, plant, and equipment to support our transport and warehousing divisions, as well as the purchase of trucks, trailers, and forklifts.

Our Finance & Administration and People & Culture teams maintain robust policies to ensure that all staff and suppliers, including agencies providing labour, uphold Mondiale VGL Group's core values and comply with our Supplier Code of Conduct.

In FY25, Mondiale VGL's Australian operations recorded total supplier spend of AU\$244 million across 1,200 suppliers. The majority of these suppliers, over 86%, are based in Australia, reflecting our focus on supporting local of all sizes.

The remaining 14% of suppliers are distributed internationally, with notable representation in New Zealand, USA, UK, Singapore, France, Hong Kong, Canada, and other countries.



## Business Operations

Mondiale VGL operates primarily as an office-based service business, with approximately 72% of our workforce located in countries with a low prevalence of modern slavery and strong government action against it<sup>1</sup>. In Australia, our operations also include warehousing and transport services, where labour hire companies may occasionally be engaged to support these functions.

While most of our Australian workforce is employed on a full-time or part-time basis, the use of temporary or casual workers in certain circumstances can present a heightened risk of modern slavery.

Temporary labour in industries with low barriers to entry often attracts migrant workers and individuals on temporary visas who may have limited English proficiency and awareness of their workplace rights. These vulnerabilities can lead to exploitative practices such as underpayment, excessive working hours, debt bondage, and fraudulent contracting through third-party labour hire arrangements.

To mitigate these risks, Mondiale VGL only engages reputable labour hire companies that meet strict screening criteria and agrees to comply with our Supplier Code of Conduct and Human Rights Policy. All temporary workers operate under the oversight of senior managers within Mondiale VGL Australia to ensure compliance and safeguard worker welfare.

## Geographical

The majority of our operations, by both employees and by revenue, are Australasian, but we do have offices in higher ranking countries for modern slavery<sup>(1)</sup>, such as Turkey, Indonesia, Malaysia and the Philippines. These operations are primarily office-based and are overseen by executives located in New Zealand, Australia, and Italy.

Our New Zealand Head Office provides shared services oversight for key functions including finance, human

resources, and compliance. Employees in all locations are subject to the same Group-wide policies and procedures, which set out minimum standards for ethical, social, and environmental practices.

This consistent governance framework helps mitigate geographical risks by ensuring the same expectations and protections apply regardless of where our people are located.

## Supply Chain

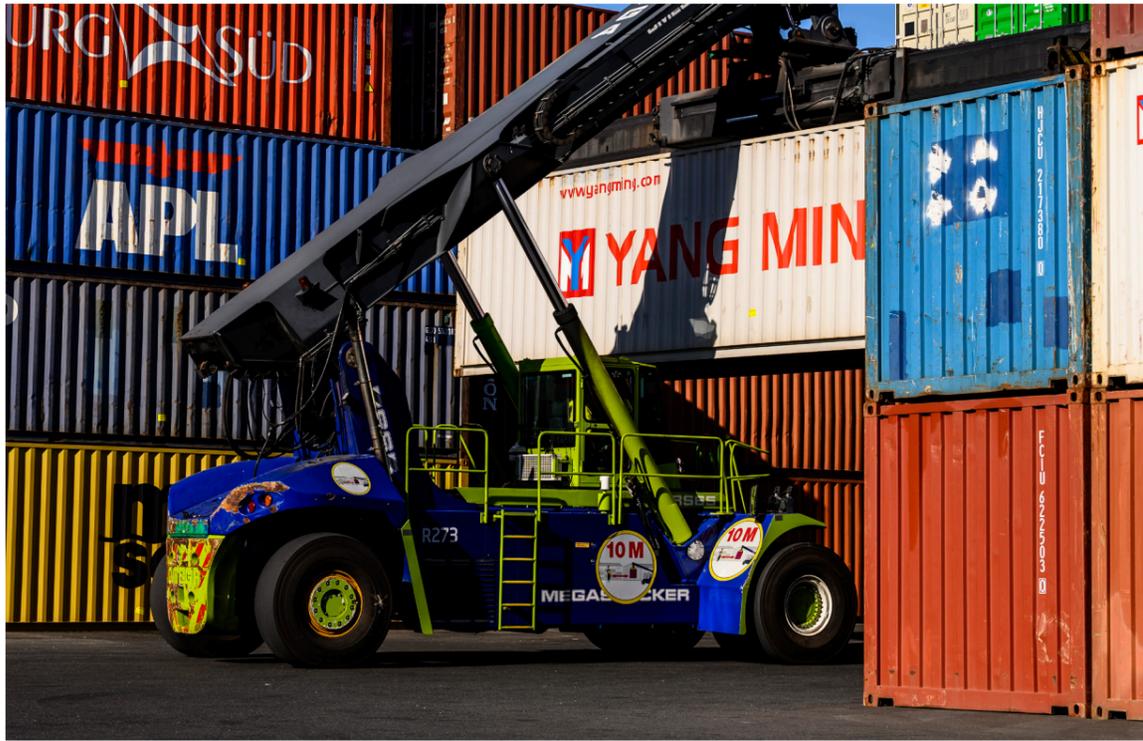
There is an inherent risk of modern slavery within our supply chain due to the nature of some supplier activities, including work performed remotely, at sea, or outside normal business hours. This makes it more difficult to oversee the performance of work and working conditions. We also recognise transactional risks associated with the procurement of IT equipment and manufactured goods, where upstream production processes may be several tiers removed from our operations.

We seek to only engage with reputable organisations across shipping, transportation, labour hire, IT services and cleaning, most of which have well-established modern slavery compliance programmes in place.

While our commercial relationships are conducted at arm's length and we may not have full visibility of their extended supply chains, we are committed to responding quickly and appropriately should any concerns or allegations be identified.

To support responsible sourcing, we maintain a Supplier Code of Conduct that outlines our expectations regarding labour standards, human rights, and ethical business conduct. We expect suppliers to comply with these requirements and to actively manage modern slavery risks within their own operations and supply chains.

<sup>(1)</sup> Walk Free 2023 Global Slavery Index, available from <https://www.walkfree.org/global-slavery-index/downloads/>



## Governance and Accountability

Mondiale VGL is committed to maintaining high standards of corporate governance and ethical conduct. The Mondiale VGL Board has overall responsibility for overseeing the management of risk across the Group, including risks relating to modern slavery. The Board ensures that appropriate risk management strategies are in place and receives timely and accurate reporting from management.

Oversight of modern slavery risks within each operating region sits with the Executive Leadership Team. At the corporate level, the Chief Financial Officer (CFO) and Chief People Officer (CPO) are responsible for coordinating the Group's approach to modern slavery risk management.

This includes reporting to the Executive Leadership Team and the Board and ensuring modern slavery considerations are integrated into relevant policies, frameworks and action plans across all regions.

All Mondiale VGL employees share responsibility for helping to identify and escalate any potential concerns. Employees are encouraged to raise issues through their leaders or via our Speak Up programme, which provides a confidential channel for reporting suspected misconduct, including modern slavery risks.

## Policy Framework

A key aspect of our approach to mitigating modern slavery risk is maintaining a robust policy framework that clearly sets out our labour standards and commitment to universally recognised human rights. Mondiale VGL has implemented a range of Group-wide policies and procedures that give effect to these commitments and guide our expectations of employees, suppliers and business partners.

Our core policies include:

- Code of Conduct
- Human Rights Policy
- Supplier Code of Conduct
- Whistleblower (Speak Up) Policy

Together, these policies help define our expectations around ethical behaviour, human rights and responsible sourcing. They form the foundation of our approach to preventing modern slavery within our operations and supply chain.

### **Code of Conduct**

We introduced our revised Code of Conduct in FY25 which guides our decision-making across the organisation. It reflects our values and sets the standards of behaviour expected from everyone who works for or engages with Mondiale VGL. The Code is supported by a suite of related policies and applies to all employees. All new employees in Australia (and globally) receive a copy of the Code and are required to complete bi-annual e-learning to reinforce understanding of its purpose and expectations.

### **Human Rights Policy**

Our Human Rights Policy is aligned with the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. It outlines our commitment to safe, lawful, respectful and inclusive working environments and provides a consistent approach to managing human rights considerations across our operations and supply chain.

### **Supplier Code of Conduct**

Our Supplier Code of Conduct sets out the standards we expect from suppliers, including the requirement to uphold human rights, provide fair working conditions and comply with all applicable laws. This includes laws prohibiting modern slavery, forced labour, human trafficking and child labour. We expect suppliers to actively manage these risks within their own operations and supply chains.

The Executive Leadership Team and the Mondiale VGL Board are responsible for driving regular reviews and updates to these policies to ensure they remain current and effective.



## Training and Awareness

In FY25 we implemented the first two modules of our global ethical compliance e-learning programme, based on the company's Code of Conduct, which were rolled out in the second half of the financial year. In addition, modern slavery e-learning modules for Australian managers and employees were rolled out towards the end of the financial year.

The Code of Conduct e-learning provides employees with an overview of our values, expected behaviours, health and safety standards, environmental and sustainability obligations, and key ethical requirements, including anti-bribery and corruption, sanctions, facilitation payments and kickbacks, and conflicts of interest.

The modern slavery e-learning modules available to Australian managers and employees set out common risks in operations and supply chains, guidance on recognising indicators of worker exploitation, and the reporting process if concerns arise.

As at 30 June 2025, 78% of employees globally had completed the Code of Conduct e-learning and 71% had completed the ethical dealings content. In Australia, 30% of employees had completed the modern slavery modules.

## Due Diligence

In FY25, Mondiale VGL implemented the EthixBase360 platform to strengthen our Group-wide approach to third-party due diligence. The platform provides a comprehensive view of supplier risk by combining modern slavery screening with broader assessments across areas such as anti-bribery and corruption, sanctions exposure, and adverse media. An initial pilot was completed with suppliers in New Zealand and Australia, with wider rollout to continue in FY26.

The platform provides ongoing monitoring and real-time reporting, allowing Mondiale VGL to monitor supplier risk profiles, track the progress of assessments and extract information for internal, customer and regulatory reporting. This supports more informed decision-making and strengthens our ability to identify and manage modern slavery and broader ESG risks within our supply chain.

## Independent Evaluation

Some of our customers require Mondiale VGL to undergo an annual assessment by EcoVadis, an independent third-party ESG risk management platform used globally to evaluate suppliers' environmental, social and governance performance. In FY25, the Mondiale VGL Group received a Bronze Medal rating, placing us within the top 35% of the companies assessed. This evaluation provides independent insight into the effectiveness of our ESG practices, including our approach to managing modern slavery risks.

## Grievance Mechanisms

In FY25, Mondiale VGL introduced its independently administered whistleblower service (Speak Up) across Australia and all operating regions. The service, facilitated by Deloitte, is available to all Mondiale VGL employees globally, as well as suppliers and customers, and provides a confidential and anonymous channel, via phone, email, mail or online, to report concerns about serious misconduct or behaviour that does not meet the standards of our Code of Conduct.

All matters raised through Speak Up are reviewed and investigated by an appropriate member of the Executive Leadership Team who is not involved in the substance of the concern, or by an external investigator where required. Whistleblowers receive timely updates through the service to support transparency and confidence in the process. In FY25, we received no reports through Speak Up relating to modern slavery.

We recognise the importance of providing a trusted and accessible grievance mechanism for people who may be affected by modern slavery in our operations or supply chain. Our Whistleblower Policy applies across all Mondiale VGL operations and is available to our people, customers, suppliers, and members of the general public. It supports our Code of Conduct by outlining how concerns can be raised and the protections available to those who speak up about suspected misconduct or wrongdoing.

# Tracking the Effectiveness of our Actions

Mondiale VGL is focused on strengthening a due diligence programme that supports proactive management of modern slavery risks in line with global standards. Recognising the importance of evaluating the impact of our actions, the key initiatives undertaken in FY25 and an explanation of how they assist us in measuring effectiveness are set out below.

Key Initiative	How we evaluate effectiveness
Introduced our revised Code of Conduct in FY25, incorporating modern slavery commitments	Formalises our group-wide commitment to mitigating modern slavery and raising awareness. The revised Code of Conduct sets clear expectations for ethical and lawful behaviour, including modern slavery risk mitigation. Distribution to all new employees and mandatory bi-annual e-learning enables us to track compliance, measure awareness, and identify areas for reinforcement.
Implemented a global ethical compliance e-learning programme for all employees, with updated content in FY25	Provides a measurable way to assess awareness and understanding of modern slavery risks. Completion rates are monitored to ensure coverage, identify training gaps, and confirm that employees understand indicators of exploitation and reporting mechanisms. Ongoing monitoring of completion data and refresher cycles helps us evaluate improvements in awareness and target further engagement where needed.

Key Initiative	How we evaluate effectiveness
Piloted due diligence software in New Zealand and Australia in FY25, combining modern slavery screening with broader compliance assessments	Enhances our ability to assess modern slavery risks in the supply chain and streamlines due diligence through automation. The platform provides structured assessments, ongoing monitoring, and real-time reporting, allowing us to track supplier risk profiles, screening outcomes, and follow-up actions. Changes in supplier risk ratings and assessment completion rates help us evaluate the impact of our programme.
Rolled out the Speak Up whistleblower service across all operating regions in FY25	Provides a confidential mechanism for employees, customers, and suppliers to report concerns about modern slavery or human rights breaches. Effectiveness is evaluated by monitoring the number and nature of reports, response times, and outcomes. While no modern slavery-related reports were received in FY25, ongoing monitoring and periodic review of the Whistleblower Policy and communications help assess accessibility, trust, and the effectiveness of grievance and remediation processes.

# Future Initiatives

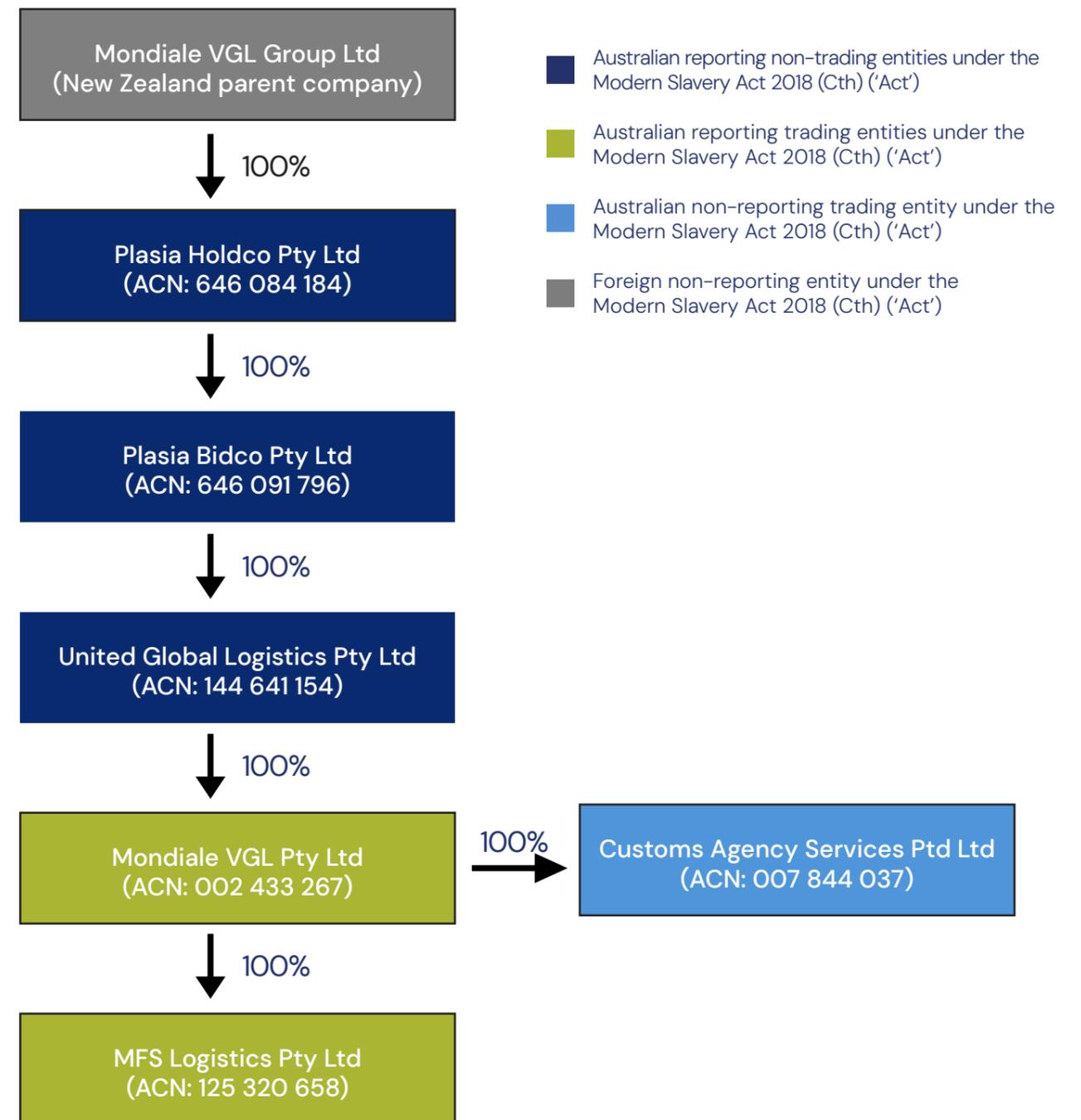
To continue strengthening our approach to identifying and managing modern slavery risks, Mondiale VGL will progress a number of initiatives in FY26 focused on improving due diligence, building capability and enhancing visibility across our supply chain. The key priorities for the year ahead include:

- Reviewing and updating our Supplier Code of Conduct and commencing its rollout to all suppliers through our due diligence platform.
- Increasing supplier awareness of our expectations by incorporating information on our independently administered whistleblowing service, Speak Up, into our terms of supply.
- Expanding our supplier due diligence processes to additional operating regions to broaden visibility of potential risks.
- Reviewing and updating our human rights and modern slavery e-learning module and extending training to all Mondiale VGL employees globally.
- Reviewing the effectiveness of the Speak Up programme after its first year of operation to ensure it provides accessible and trusted grievance pathways for employees and stakeholders.



## Appendix: Mondiale VGL Group Limited Structure

Mondiale VGL Group Limited, is a private company in New Zealand and is the parent company of the Plasia Holdco Pty Ltd Australian consolidated group. Additionally, at the end of the reporting period (30 June 2025), Plasia Holdco had wholly and majority-owned subsidiaries in Europe and the United States and minority investments in companies domiciled in India.



## Appendix: Mandatory Criteria of the Modern Slavery Act

The table below explains how this Statement meets the mandatory reporting criteria set out in the Act.

Mandatory Reporting Criteria	Reference
Identify the reporting entity	Contents – page 2 Our structure, operations and supply chain – page 4
Describe the reporting entity's structure, operations and supply chains	Our structure, operations and supply chain – page 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Modern slavery risks – page 10
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Actions to Assess and Address Modern Slavery Risks – page 12 Future initiatives – page 11
Describe how the reporting entity assesses the effectiveness of these actions	Tracking the effectiveness of our actions – page 16
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Contents – page 2
Any other information that the reporting entity, or the entity giving the statement, considers relevant	Message from the CEO and Chair of the Board – page 3 Future initiatives – page 18

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