

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).

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 2023.

Northline takes Modern Slavery seriously and as such is dedicated to partner with businesses which take the same position. Northline therefore embraces its responsibility to minimise the risks of Modern Slavery in its operations and supply chain.

Northline expects its business partners to align with our governing principles and take responsibility to:

- investigate their labour practices and have processes and compliance systems in place to ensure that there is no modern slavery used in their operations or supply chains.
- avoid infringement of human rights and for remediation of the impact, if any, on human rights resulting from activities performed for us and from services provided to us and
- maintain and improve systems and processes to identify, prevent and mitigate any human rights abuse of their operations.

Reporting Entity

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

Northline Partnership is the controlling entity of the organisations within the group commonly known as Northline. Operational management is the same for all organisations.

During the reporting period this statement covers, we actively engaged and consulted with all companies owned or controlled by Northline Partnership regards the mitigation of modern slavery risks and the initiatives Northline Partnership take as noted in this statement.

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 staff across Australia as well as numerous sub-contractors across all states and territories of Australia providing services to our customers.

Risk of Modern Slavery Practices

Northline Operations

All employees engaged by Northline reside in Australia. All work for Northline is conducted on a voluntary basis and under detailed contracts of employment which comply with National Employment Standards.

Northline employees are free to withdraw from any employment relationship, subject to previous notice with reasonable length.

Northline prohibits and does not benefit from any forms of forced or compulsory labour and respects ethical labour practices and diversity.

Northline Supply Chain

Our supply chain includes engagement of a substantial network of subcontractors, agents and suppliers.

This network offers a greater level of risk of Modern Slavery practices in certain areas and is therefore subject to greater scrutiny by us. Notwithstanding, those business partners are predominantly Australian based with a low Modern Slavery risk base.



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as agent for Northline Partnership

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Australian based suppliers include:

- *Regular Pickup and Delivery (PUD) Contractors and Other Subcontractor Suppliers of Inter and Intra state transport and agency services.*

These companies are engaged by Northline under a contract or work agreement, and we consider to be at very low risk of contributing to or being linked to modern slavery exploitations with this group of contractors.

- *Non-Transport Supplier – Facilities maintenance and site services*

Northline also sources a wide variety of other goods and services from a diverse range of suppliers including large multinational or Australia wide organisations, Australian based suppliers of varying sizes who source some or all their finished products or raw materials for those products from overseas, and Australian based SME's which provide services to Northline such as office cleaning, facilities maintenance and so on.

We consider Northline to be at some risk of contributing to modern slavery through association with some of these suppliers whom source products, or raw materials for products, from overseas.

International Agents

Our international network transports, stores, tracks and delivers freight, by road, rail, sea and air across the globe, and seamlessly connects into our domestic network.

International agents are engaged by Northline to contribute to our international service offering.

We consider to be at some risk of contributing to modern slavery through association with some of these international agents based overseas.

Actions Taken to Address Risks of Modern Slavery Practices

Northline has continued to progress its Modern Slavery program including:

- *Supplier Risk Assessment*

Northline has conducted a Risk Assessment of its major business partners (suppliers and agents) which included evaluation of:

- Sector and industry
- Products and services
- Geographic supply locations including factories and distribution centres
- Entity risks - supply chain model risks such as hours worked, overtime, contract workforce and so on

- *Supplier and Contractor Confirmation and Acknowledgement*

Northline is currently presenting a Modern Slavery questionnaire to major suppliers and contractors, to seek declaration that confirmation services they provide to Northline are not a product of supply chains in which modern slavery is taking place.

- *Supplier Code of Conduct*

Northline has adopted a Supplier Code of Conduct which articulates the expectations of the company's suppliers including in respect of their stance on modern slavery and human trafficking, ethical business practices, anti-competitive conduct, safe and fair work conditions, and environmental responsibility.

The Supplier Code of Conduct specifically states that suppliers must ensure that all work is undertaken without coercion or any form of forced, bonded, indentured or involuntary labour.

- *Supplier Agreements*

Similarly, a Modern Slavery clause which articulates the same expectations has been completed to be included in formal supply agreements.

- *Modern Slavery Statement*

Northline has released its Modern Slavery statement to all employees and includes the statement and a brief in the induction program for all new employees.

All employees will be engaged in an awareness program in 2024 to support the statement and enhance the importance of Modern Slavery, their understanding of the principles and risk areas, and to reiterate the Whistle Blower Reporting Procedure.

- *Whistle Blower Procedure*

Whistleblowing is an important mechanism to provide an avenue for reporting certain concerns such as modern slavery activities, misconduct or wrongdoing, with protections for individuals who make eligible whistleblowing reports.

Northline's Whistle Blower Reporting and Protection Procedure was released in 2022 and includes an independent Whistleblower Protection Officer to whom any employee, secondee, contractor or supplier can report a reportable conduct. This is referenced in our Supplier Code of Conduct.

Assessing the Effectiveness of Actions Taken

Employees have and continue to provide open and positive feedback on the initiatives the business has taken.

Relevant indicators of effectiveness of Northline actions include:

- the number of issues or potential issues identified by management.
- the number of notifications of risks or issues raised by employees, contractors or suppliers.
- the incidence of Northline's business partners being involved in modern slavery.

Northline has not received any notifications or identified any issues. However, we will continue to remain alert to the risk of modern slavery and human trafficking in our own business and those of our business partners.

Our business partners are supporting their own engagement, which to date has been reflected in their readiness and cooperation. Many have been appreciative both of their inclusion in Northline's initiatives and the education opportunity we are providing them.

Other Relevant Information

Internally, we will continue to educate our staff to be aware of practices which fall under the scope of Modern Slavery across all our business partners and encourage them to report any such observations or instances.

Over the next reporting period, we will continue to assess ways to reduce the risks of modern slavery and some steps will include:

- To continue to monitor the responsiveness of our major business partner Self-Assessment Questionnaire.
- To develop frameworks and processes to ensure that we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.
- To conduct modern slavery awareness training for our employees involved in procurement and purchasing and key employees responsible for the sourcing of new suppliers.
- To review and update Northline Procurement and Purchasing policies as needed.

This statement was approved by all partners of Northline Partnership on 22 December 2023.



David Harford

Director

Northline Group Pty Ltd, managing partner of Northline Partnership