

Modern Slavery Annual Statement

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).

Northline embraces the ideals of maintaining strong corporate governance, ethical conduct, transparency and respecting human rights in accordance with our Values and Code of Conduct. Similarly, as we do, we expect all of our business partners to recognise the Human Rights of all people as outlined in the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights.

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

- ✘ thoroughly 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.

In summary, to ensure that goods and/or services provided to Northline are not a product of supply chains in which modern slavery is taking place.

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 2022.

Reporting Entity

Northline is an Australian owned 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 Australia. We have connections to over 100 international agents based in countries all around the world. The company has employees 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

Within Northline

Northline considers that there is little risk of modern slavery practices within our own business. Northline prohibits and does not benefit from any forms of forced or compulsory labour. All work for our business is conducted on a voluntary basis. Our employees are free to withdraw from any employment relationship, subject to previous notice with reasonable length.

The processes of recruitment and induction of all new employees includes provision of the Fair Work Information Statement which provides details about the National Employment Standards and other relevant information concerning employer and employee rights and obligations.

Within Northline Supply Chain

Our supply chain offers a greater level of risk of modern slavery practices in certain areas and is therefore subject to greater scrutiny by us.

Northline categorises its suppliers as follows:

- Regular Pickup and Delivery (PUD) Supplier
- Other Transport Supplier – Linehaul, Country Carrier and ad hoc (“Outside Hire”) PUD
- Non-Transport Supplier – Facilities maintenance, site services and other service providers

Regular Pickup and Delivery (PUD) Supplier

Based in Australia, these contractors provide a PUD service to Northline either directly as an owner driver, or as an owner and manager of a number of vehicles with employed drivers who carry out that same PUD service.

They are inducted to Northline's HSEQ management system and are trained to meet Northline's operations requirements. They are directly managed by Northline both operationally and to ensure compliance of their business details, vehicles, drivers and site safety inductions.

However, Northline does not have complete visibility of the employment arrangements between the subcontractor vehicle owners and the drivers engaged by them.

Other Transport Supplier – Linehaul, Country Carrier and ad hoc PUD

Based in Australia, these contractors or companies are engaged by Northline under a contract or work agreement to carry out freight forwarding services by either road or rail. Typically, such businesses engaged here to do so are larger service providers than the regular PUD contractors and have their own business management systems and processes in place which are evaluated and approved by Northline prior to engagement.

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 with established reputations and sound business practices who have their own modern slavery programs, some of which will present their own Modern Slavery Statement that confirms that understanding.
- Australian based suppliers of varying sizes who source some or all of their finished products, or raw materials for those products, from overseas.
- Australian based SME's which provide services to Northline such as office cleaning, facilities maintenance and so on.

International Agents

In relation to the international agents engaged by Northline as part of our International Freight Management processes, Northline 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.

Actions Taken to Address Risks of Modern Slavery Practices

Northline has taken opportunity in the last 12 months to enhance its approach to modern slavery by resetting our approach to risk management and the connection with our suppliers.

In doing so we have:

- Released a revised Modern Slavery Statement
- Engaged our employees in modern slavery principles and risks
- Revised and released our Whistle Blower Reporting and Protection Procedure to all employees

And further, we are in progress with

- Reaching out to our Regular PUD Suppliers and Other Transport Suppliers to remind them of the obligations they face under modern slavery legislation and to source their acknowledgement and confirmation of such
- A modern slavery risk factor self-assessment
- A review our supplier base and a Supplier Risk Assessment
- Upgrading our eLearning induction program to include both our Modern Slavery Statement and our Whistle Blower Reporting and Protection Procedure

Modern Slavery Statement

Measures to prevent modern slavery start with companies declaring their understanding, recognition and support of Human Rights of all people.

Northline's statement clearly outlines our company position which is equally our expectation of our stakeholders.

Employee Engagement

Anti-slavery and human trafficking policies must be communicated to stakeholders. Northline has ensured its employees have been educated and engaged to enhance their awareness and also to enlist their active participation and support.

Employees are encouraged to actively comment on issues concerning the running of their departments, the business as a whole and any observations or concerns they may have across all Northline stakeholders.

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 has very recently reviewed and released an improved Whistle Blower Reporting and Protection Procedure.

Risk Factor Self-Assessment

An assessment is in progress of where our Tier 1 operations and business partners, suppliers in particular, are located and from where they source products and services.

By mapping our operations and Tier 1 suppliers in supply chains against relevant tools and data points, we are identifying and considering modern slavery risks.

With this information we will drill down to understand more about the supplier's specific risk profile by conducting supplier risk assessments.

Supplier Risk Assessment

Modern slavery has been found to reach many industries and to occur in every region of the world, however there are common indicators that increase the likelihood that modern slavery is occurring in the supply chain.

Northline is undertaking a Risk Assessment, as is reasonably practicable, which contains such key risk indicators and related risk factors to our Tier 1 level in our supply chain.

The key risk indicators in the Risk Assessment are:

- 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

This information will then be used to further assess risks associated with those locations and activities.

Supplier Confirmation and Acknowledgement

We are extending our reach to our transport supplier's by requesting confirmation in declaration that services they provide to Northline are not a product of supply chains in which modern slavery is taking place.

Furthermore, we are enhancing our supplier prequalification process to include declaration and acknowledgment of the same. Amongst other requirements, approval to provide goods and/or services to Northline will not be granted without positive response.

Assessing the Effectiveness of Actions Taken

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

Our transport suppliers 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.

Process of Consultation with Entities Owned or Controlled by Northline

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

Other Relevant Information

Northline has a strong culture of continuous improvement. Business growth is enhanced by innovative thinking by many of our employees. The path of continuous improvement is an ongoing one for us.

In addressing modern slavery, this is demonstrated by the both the actions taken this year and our in-progress initiatives.

Whilst we consider our progress in the last 12 months as positive, as a company we still need to broaden our approach and will do so in the future by the inclusion of lower risk areas in our supply chain. These are mostly our locally based SME suppliers who we believe are clearly low risk but must be included in our future period reporting.

In previous years, Northline has sourced acknowledgement and declaration from a number of our major supplier tiers, but by no means did we have an exhaustive response. Our intent is to close those gaps by again reaching out to suppliers who have not previously responded.

Internally, we will continue to educate our employees to be aware of practices which fall under the scope of modern slavery across all of our stakeholders, and to encourage them to report any such observations or instances.

This statement was approved by all Partners of Northline Partnership on 24 December 2022.



David Harford
Director
Northline Group Pty Ltd, Managing Partner of Northline Partnership