

Ofload Modern Slavery Statement 2025



Introduction

Ofload (Digital Services Australia IV Pty Ltd ACN 633 652 749) is committed to operating responsibly and upholding human rights within our business operations and supply chain. We recognise the risks of modern slavery and human trafficking within the transport and logistics industry, and we are dedicated to taking meaningful steps to prevent and mitigate these risks.

This statement outlines our actions to address modern slavery during the financial year ending 31 December 2025. This is our second Modern Slavery Statement, and it demonstrates the progress we have made in implementing the commitments outlined in our 2024 statement, as well as our ongoing commitment to continuous improvement in addressing modern slavery risks.

Our Business and Structure

Ofload is a digital freight forwarder that optimises truck utilisation to reduce waste and improve sustainability in the transport sector. We work with shippers and carriers across Australia, with a particular focus on supporting owner/operator carrier partners in making informed decisions about their fleets. Our platform connects carriers with freight opportunities, enabling more efficient and transparent logistics operations. Ofload's wholly-owned subsidiary, MF Freight Pty Ltd, operates under the same contractual obligations and policies as Ofload.

Ofload's registered office is 155 Clarence Street, Sydney NSW 2000. As of the end of the financial year, Ofload had 104 employees. The majority of these employees are based in Sydney or Melbourne offices. All Ofload employees have agreed employment contracts that are compliant with relevant employment laws.

Ofload, through an employer of record company (Deel), works with international team members. There are 15 such team members who consist of Customer Service Representatives and Software Engineers. Deel is an internationally recognised entity for global employment compliance.

Changes to Our Business Structure in 2025:

Ofload transitioned our server and cloud data infrastructure to be based in Australia in connection with multiple business objectives including consideration of reducing Modern Slavery risk factors. Additionally, we expanded our compliance team with the appointment of a Compliance & Performance Manager, to support ongoing assurance program enhancements and assessments.

Our Supply Chain

Our supply chain encompasses several distinct categories that support our operations as a digital freight forwarding platform.

Transport and Logistics Partners

Our primary supply chain consists of more than 200 small and medium-sized trucking businesses operating as subcontractors across Australia, with a particular concentration of carriers along the east coast of Australia. These carriers range from independent owner-operators to larger transport companies who provide freight services.

During this reporting period, we have improved our understanding of our carrier network by conducting detailed mapping of our carriers by volume and freight type; categorising our active carrier pool into risk tiers based on fleet size and geographic location.

All Ofload subcontractors are engaged under agreed freight rates and terms and conditions. Given the nature of our industry, we acknowledge that there are potential risks of labour exploitation, particularly in subcontracting arrangements, extended supply chains, and third-party service providers.

Technology and Digital Infrastructure

To support our digital platform operations, we maintain relationships with various technology service providers, infrastructure partners, and cloud service providers who are essential to maintaining our platform capabilities. These technology suppliers include both Australian and international providers.

During this reporting period, we have enhanced our visibility of technology supply chains by reviewing contracts and agreements for sufficient modern slavery clauses and obligations and introducing vendor questionnaires related to gathering appropriate information on Modern Slavery actions.

Professional Services and Office Operations

Our broader supply chain includes professional services providers such as accounting, legal, and consulting firms, as well as suppliers of office facilities, cleaning services, and general business equipment. The majority of our suppliers across all categories are based in Australia, though some of our technology infrastructure providers operate globally.

During this reporting period, we have maintained our existing supplier relationships in this lower-risk category and continue to include modern slavery considerations in our procurement processes.

Risks of Modern Slavery in Our Operations and Supply Chain

During this reporting period, we have deepened our structured assessment of modern slavery risks across our operations and supply chains, building on the initial risk identification conducted in 2024. We continue to consider how we might cause, contribute to, or be directly linked to modern slavery practices.

Progress in Risk Assessment

In our 2024 statement, we identified key risk areas but acknowledged we were in the early stages of our response. Since this time, we have conducted a formal Risk Assessment to

consider potential Modern Slavery risks within our supply chain. This process identified eight risk areas that Ofload are managing on an ongoing basis.

Transport Industry Operations and Labour Practices

Our assessment continues to identify that the trucking sector presents specific modern slavery risks, particularly regarding working conditions and payment practices. Key vulnerabilities include:

- The widespread use of subcontracting arrangements in the transport industry;
- The presence of migrant workers who may be more vulnerable to exploitation;
- The existence of debt bondage related to financing for equipment needed to operate in the transport industry; and
- The geographic dispersion of our carrier network, which can make oversight challenging.

Enhanced Understanding in 2025:

During this reporting period, our enhanced due diligence has noted that subcontracting arrangements remain prevalent across our carrier network, which we continue to treat as a key risk factor warranting ongoing monitoring. We have not identified any confirmed instances of modern slavery in our carrier network during this period; however, we recognise that the hidden nature of these practices means that the absence of identified cases does not confirm absence of risk.

Technology Supply Chain Risks

While our technology suppliers are predominantly established companies, we recognise potential risks in the broader technology supply chain, particularly regarding hardware manufacturing and raw materials sourcing.

Enhanced Understanding in 2025:

During this reporting period, we have maintained our existing technology supplier relationships and continue to assess these risks as lower priority compared to our transport operations.

Geographic Risk Factors

While most of our direct operations are in Australia, we work with international technology providers and maintain offshore customer service operations through Deel in the Philippines, India, Nepal and Indonesia.

Enhanced Understanding in 2025:

During this reporting period, we have continued to rely on Deel's compliance processes and confirmed of their global compliance framework related to addressing human rights, anti-exploitation and other areas related to modern slavery.

Risk Prioritisation

Based on our assessment, we have prioritised the following areas for action:

- Highest Priority: Direct carrier relationships, particularly those involving subcontracted drivers and migrant workers
- Medium Priority: Professional services and technology suppliers based in Australia and overseas
- Lower Priority: Offshore customer service operations through Deel

This prioritisation is based on the severity of potential harm to workers (scope, scale, and irremediability) rather than probability or business risk to Ofload.

Our Approach to Addressing Modern Slavery

Progress Against 2024 Commitments

In our 2024 statement, we committed to enhancing our approach through updating policies, implementing training programmes, and creating reporting processes. This section demonstrates our progress against those commitments.

Commitment 1: Updating Existing Policies

2024 Commitment: "Updating our existing policies to better address modern slavery risks"

2025 Progress: Modern Slavery Policy was distributed and signed by all employees. This policy is included in staff onboarding to ensure that all employees are aware of Ofload's policy in relation to Modern Slavery.

Commitment 2: Implementing Targeted Training Programmes

2024 Commitment: "Implementing targeted training programmes for our employees and carrier partners"

2025 Progress: We delivered our first annual Modern Slavery Training to staff with an attendance rate of greater than 80%. This training improved the awareness of Modern Slavery risks within our supply chain and equipped employees with tools to raise any concerns.

Commitment 3: Creating Clear Reporting Processes

2024 Commitment: "Creating clear processes for reporting and addressing any modern slavery concerns identified"

2025 Progress: Staff members were trained on processes to report Modern Slavery concerns including through formal reporting channels such as their direct manager or People & Culture, as well as anonymously as set out in Ofload's Whistleblower Policy.

Reports Received: No reports were received through our reporting channels during the year, which may reflect either the absence of issues or the need to improve awareness of reporting channels among our broader carrier network.

Actions Taken During 2025

Beyond our 2024 commitments, we have taken the following additional actions during this reporting period:

- Updated our standard Shipper and Carrier Terms & Conditions to include modern slavery clauses requiring compliance with Australian labour laws
- Published Ofload's External Grievance Policy on our website, making it accessible to vendors, carriers, drivers, and the general public
- Continued to monitor and investigate driver fatigue and work hour breaches through our Chain of Responsibility and Safety Management System, recognising these as potential indicators of exploitation

We acknowledge that as a growing business, we face resource constraints and limited visibility into subcontracting arrangements beyond our direct carrier relationships. We are taking a pragmatic, risk-based approach by focusing our initial efforts on our highest-risk relationships and building our capability over time

Measuring Our Effectiveness

In our 2024 statement, we acknowledged we were developing our approach to measuring effectiveness. During 2025, we have made progress in establishing processes to assess whether our actions are working, though we recognise this remains an area for further development.

What We Have Tracked

During this reporting period, we have monitored:

- Greater than 97% of employees reviewed and acknowledged our Modern Slavery Policy
- Greater than 80% of staff completed Modern Slavery training
- Implementation of modern slavery clauses in Shipper and Carrier Terms & Conditions
- Investigation of driver fatigue and work hour breaches through our Chain of Responsibility and Safety Management System

What We Have Learned

Our experience during this reporting period has shown that:

- Integrating modern slavery into existing Chain of Responsibility processes has been effective in raising awareness and monitoring potential risk indicators
- Staff training has significantly improved awareness and confidence in identifying modern slavery risks
- We need to develop more systematic processes for assessing carrier risks beyond our direct contractual relationships
- Publishing our External Grievance Policy provides an important channel for concerns, though awareness of this mechanism needs to be improved among drivers in our carrier network

We recognise that measuring effectiveness is an area requiring further development. For the next reporting period, we plan to establish more formal KPIs and regular review processes to better track our progress.

Priorities for 2026

Based on our progress during 2025 and our ongoing assessment of modern slavery risks, we have identified the following priorities for the next reporting period:

- Develop a more systematic approach to assessing modern slavery risks in our supplier relationships, including enhanced due diligence for high-risk suppliers
- Enhance our understanding of subcontracting arrangements used by key carriers
- Improve awareness of our External Grievance Policy among drivers in our carrier network

Consultation

Ofload (Digital Services Australia IV Pty Ltd) owns one subsidiary, MF Freight Pty Ltd. Both entities operate under the same contractual obligations and compliance systems, sharing office locations in Sydney and Melbourne, as well as integrated management structures.

During the preparation of this statement, consultation with MF Freight Pty Ltd occurred through our shared management team and integrated operational processes. This consultation was facilitated by our co-located operations and unified management approach, ensuring consistent understanding and implementation of our modern slavery obligations across both entities.

Conclusion

At Ofload, we recognise that addressing modern slavery is an ongoing responsibility that requires sustained commitment and continuous improvement.

During this reporting period, we have made progress in implementing the commitments outlined in our 2024 statement. We have updated our policies to address modern slavery risks and provided training to our team.

We acknowledge that we are still developing our modern slavery response and that significant work remains to be done. As a growing business, we have needed to balance our modern slavery initiatives with operational priorities, while ensuring we focus on the areas of highest risk to workers. The complexity of modern slavery risks in the transport sector, particularly the widespread use of subcontracting, presents ongoing challenges that require sustained effort to address.

We are committed to working collaboratively with our carriers, suppliers, and industry partners to promote ethical practices and fair working conditions throughout our sector. We will continue to strengthen our response to modern slavery and report honestly on our progress in future statements.

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Geoffroy Henry

Director and CEO

This statement was approved by the board of Digital Services Australia IV Pty Ltd in their capacity as the principal governing body of Ofload on 18 June 2026.

This Modern Slavery Statement is made pursuant to the Australian *Modern Slavery Act 2018 (Cth)* and reflects our commitment to upholding human rights within our operations and supply chain.