

Modern Slavery Statement FY25

Introduction

This statement describes the actions taken by Group Messengers Pty Ltd (ABN 64 084 916 478) ('Group Messengers'), to assess and address modern slavery in its operations and supply chain in compliance with the Modern Slavery Act 2018 (Cth) for the reporting period 1st July 2024 to 30th June 2025.

Group Messengers operates within the Capital Group. Throughout this Statement, references to Capital Group and the terms "our," "we," or "us" denote all entities within the Capital Group including the reporting entity, Group Messengers.

Modern slavery encompasses serious forms of exploitation in which individuals are deprived of their freedom and cannot refuse or leave situations of exploitation due to threats, coercion, or deception, and includes practices such as forced labour, debt bondage, servitude, human trafficking, and the worst forms of child labour.

Through this statement, we reaffirm our commitment to transparency, accountability, and continuous improvement in preventing modern slavery and collaborating with our stakeholders to drive meaningful change.

An overview of Capital Group's Structure

Capital Group is a privately owned and operated Australian transport and logistics group with over 35 years of experience providing freight solutions nationwide. Capital Group is governed by a Board of Directors and an Executive Leadership Team that manages its operations across facilities in all major Australian capital cities. The Modern Slavery Working Group manages the assessment and audit system on behalf of the Audit & Risk Committee that reports to the Board of Directors.

Capital Group employs approximately 590 staff across its operations, engages a fleet of over 2,300 subcontractors, and partners with 130 carrier operators to deliver specialised and flexible transport and logistics services. Our operations involve a diverse range of transport modes, warehousing, and supply chain management services. Capital Group services a broad client base through a variety of operating entities including Group Messengers (the Reporting Entity) which engages many of our subcontractor drivers and does not itself own or control any other entities.

An overview of Capital Group's Operations and Supply Chain

Operation	Description	Supply Chain
Last-mile Freight	Last-mile deliveries for metro and regional services across Victoria, New South Wales, Queensland, South Australia & Western Australia. Light-commercial vehicles up to large Semi's and Articulated Trucks.	Subcontractor drivers Labour hire Driver equipment suppliers Vehicles Fuel Tyres Repairs and parts
Long-haul Freight	Interstate and intrastate deliveries across Australia.	Fleet operators
Warehousing	End to end supply chain management including: <ul style="list-style-type: none"> • Storage • Cross-docking • Unpacking services • Picking and dispatch 	Labour hire Equipment LPG Racking Pallet hire Packaging materials Waste & utility management
Internal Operations	Employees managing our operations and supply chain.	IT hardware and software Cleaning & laundry Catering Uniforms & PPE Office maintenance & gardening Security Waste & utility management Office supplies Recruitment Travel management

Risks of Modern Slavery in Operations and Supply Chain

Capital Group recognises that certain aspects of its operations and supply chain carry a higher risk of modern slavery practices. Through the establishment of our Modern Slavery Working Group, we have conducted a comprehensive risk assessment. This assessment applied a risk rating approach across our operations and supply chains, considering:

- Vulnerable populations, including migrant and low skill workers,
- High-risk business models, such as labour hire and outsourcing arrangements,
- High-risk product and service categories, and
- Regulatory and geographic contexts where there is weak rule of law, corruption, or human rights concerns.

Key risk areas identified include:

- Subcontractor & labour hire transport drivers, including migrant workers and engagement of drivers under insecure arrangements,
- Outsourcing through logistics fleet operators,
- Warehousing labour hire arrangements, which may involve temporary or migrant workers,
- Imported goods and materials, including packaging, uniforms, and office & IT equipment from international suppliers operating in areas with weaker labour protections,
- Contractors providing cleaning, catering, gardening, maintenance, waste, and security services.

We are committed to continuously enhancing our due diligence processes to identify and assess these risks in accordance with our obligations under the Commonwealth Modern Slavery Act 2018.

Actions taken to assess and address Modern Slavery risks

Capital Group has implemented a range of actions to address the modern slavery risks identified across its operations and supply chains. These actions include:

- Subcontractor and labour hire transport drivers:
 - Agreements that emphasize compliance with Modern Slavery legislation,
 - Due diligence audits on subcontractors and labour hire providers, including via Questionnaires,
 - Confirm compliance with working rights, with a focus on protecting vulnerable and migrant workers.
- Outsourced logistics fleet operators:
 - Engagement with suppliers on modern slavery obligations and conducting regular supplier reviews to ensure adherence to ethical and legal standards,

- Including assessing Modern Slavery Policies & Statements and requesting questionnaires be completed.
- Warehousing labour hire arrangements:
 - Robust onboarding and monitoring procedures for labour hire providers to ensure that temporary and migrant workers are treated fairly and in accordance with applicable employment laws.
- Imported goods and materials:
 - Supplier risk assessments to ensure adherence to ethical sourcing standards, particularly in areas with weaker labour protections.
- Contractors providing cleaning, catering, gardening, maintenance, waste, and security services:
 - Ongoing oversight of service providers to ensure compliance with our ethical standards,
 - Request for Modern Slavery Questionnaires to be completed where appropriate,
 - Formation of a clear method for identifying, assessing, and classifying human rights risks.

Consistent with these actions are the key policies and governance practices that uphold Capital Group's commitment to proactively mitigating Modern Slavery risks.

These policies and procedures include:

- Employee Induction Procedure,
- Driver Onboarding Procedure,
- Labour Hire Onboarding Procedure,
- Equal Opportunity Policy,
- Bullying and Harassment Policy,
- Whistleblower Policy,
- Formal Complaint Procedure – Employees,
- Formal Complaint Procedure – Subcontractor,
- Subcontractor Compliance Management System,
- Workplace Health & Safety Policy,
- Transport Safety Standards Policy,
- Chain of Responsibility Procedure,
- Logistics Supplier Questionnaire,
- Warehouse Safety Standards Procedure,
- Warehouse Risk Assessment,
- Modern Slavery Questionnaire.

Building Awareness of Modern Slavery Risks & the Remediation Process:

Capital Group has implemented a company-wide education program to raise awareness of modern slavery risks. Our ability to identify and respond to modern slavery issues is reliant on our employees understanding, identifying, and reporting potential breaches.

The training covers the requirements of the Modern Slavery Act, how to identify potential indicators of modern slavery, and appropriate actions to take. This includes highlighting the process for addressing and remediating any breaches or suspected breaches of the Act.

Capital Group encourages the reporting of any suspected incidents of modern slavery. We provide multiple channels for such reporting, including under our Whistleblower Policy. Reports may be made anonymously and are investigated promptly. Breaches may result in disciplinary action, including termination of employment or contracts, cessation of business relationships, or reporting to authorities may follow any confirmed violations.

Capital Group's education program, supported by robust policies and procedures, underpins our culture in which any deliberate facilitation or tolerance of modern slavery or exploitation within our operations or supply chains is unacceptable.

Assessing the effectiveness of our actions

Capital Group measures the effectiveness of its modern slavery risk management through a range of performance indicators of our actions to identify and address modern slavery practices. We have four key performance areas:

Governance:

- Stringent risk assessments across all operations, which include evaluation of agreements and contracts with modern slavery clauses. These reviews did not identify any instances of non-compliance relating to modern slavery or broader human rights issues.

Supply Chain Due Diligence

- Analysis and risk assessments were conducted across our supply chain partners. This included subcontractor transport drivers, logistics fleet operators, labour hire companies, and contract suppliers. Key KPIs include number of suppliers with a modern slavery policy / statement or who completed the

modern slavery questionnaire. The review of data, responses and declarations did not reveal any areas of high concern.

HR Practices, Training and Education

- Employees e-learning training that included elements designed to raise awareness of modern slavery risks within the workplace and across supplier relationships. We monitor the completion rates for the awareness training to confirm staff engagement.

Grievances and Reporting

- We record the number of modern slavery cases identified or raised. No modern slavery-related grievances were reported during FY25.

We will continue to review and enhance our performance indicators to ensure the effectiveness of our actions, in line with continuous improvement.

Future Actions

Capital Group acknowledges that addressing modern slavery is an ongoing process that requires continuous improvement. In the next reporting period, we intend to:

- Continue to review our governance, risk management and due diligence systems.
- Expand the education program, including for subcontractors, to increase awareness and highlight our grievance and incident reporting systems.
- Review and refine our policies and procedures to align with emerging best practices and stakeholder expectations under the Commonwealth Modern Slavery Act 2018 (Cth).
- Develop greater visibility of the arrangements between subcontractors and their employees.
- Enhance labour hire oversight through strengthened obligations, audits, and monitoring processes.
- Improve due diligence by introducing enhanced supplier onboarding and monitoring processes, including periodic audits where appropriate.

Through these initiatives, Capital Group will continue to build transparency, accountability, and resilience across its operations and supply chains, in alignment with its obligations under the Commonwealth Modern Slavery Act 2018 (Cth).

This statement was approved by the Board of Directors of Capital Group in their capacity as principal governing body of Capital Group on *19th December 2025*.



Philip Mason

Managing Director

Capital Group