



Modern Slavery Statement

FY2022



Contents

Purpose of the Statement	4
Understanding Modern Slavery	5
Our Structure and Operations	6
Our people	7
Our Supply Chain	8
Risks of Modern Slavery in our Operations	9
<i>Operations Risks</i>	<i>9</i>
<i>Labour Risks</i>	<i>9</i>
<i>Recruitment Risks</i>	<i>10</i>
Risks of Modern Slavery in our Supply Chain	11
Our Actions	13
<i>Policy and Standards</i>	<i>14</i>
<i>Recruitment</i>	<i>16</i>
<i>Visits to Outsourced Team in The Philippines</i>	<i>17</i>
<i>Internship</i>	<i>17</i>
Due Diligence	18
Monitoring and Reporting	19
Training of Staff	19
Assessing the Effectiveness of our Actions	20
During COVID	21
Case Study	22
Consultation	23
Continuous Improvement	24

Message from the Managing Director

Modern slavery in supply chains remains a complex and serious problem that has become more prevalent as a result of Covid 19 and rising supply chain prices.

While acknowledging that modern slavery is difficult to identify in practice, PAE will continue to actively participate in the global initiative to end all forms of modern slavery by taking steps to protect human rights and employees' freedoms within our operations and in our supply chain.

For this reporting period, we continued to evaluate our operations and supply chain and undertake continuous improvement initiatives to raise awareness and mitigate the risks of modern slavery occurring within our operations and supply chain.

We are pleased to issue our third Modern Slavery Statement on behalf of our Board of Directors and employees, providing information on our progress in assessing and mitigating the risk of modern slavery in our operations and our supply chain in FY22.



Andrew Maguire

Andrew Maguire
Managing Director

Purpose of the Statement

Pacific Asia Express Pty. Ltd. (PAE) recognises and accepts our responsibility to respect the human rights of all people without any discrimination and we are committed to preventing and addressing any risks of adverse human rights impact linked to our operations and supply chain. As part of our commitment to upholding human rights for all, we take a stand against modern slavery, and commit to working with all our stakeholders to reduce and eradicate the practice of modern slavery and human trafficking within our operations and beyond.

This Modern Slavery Statement, made pursuant to the Australian Modern Slavery Act 2018 (the Act), aims to articulate the risks of modern slavery within PAE's operations and supply chains, as well as the steps we have taken, and will take in subsequent reporting periods, to manage and address these risks.

Our Modern Slavery Statement has been prepared in accordance with the Act's mandatory reporting criteria, which are as follows:

- A description of PAE entity and its structure;
- An outline of our operations and supply chains;
- An assessment of the potential modern slavery risks in those operations and supply chains;
- Actions taken to assess and address those risks in the reporting period;
- Assessment of the effectiveness of such actions and future steps;
- Any other information that the reporting entity considers relevant, which could include issues arising out of the COVID-19 pandemic.



Understanding Modern Slavery

Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine personal freedoms. Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

It does not include practices like substandard working conditions or underpayment of workers, though these practices are also harmful and may be present in some situations of modern slavery.

Modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible businesses, and can pose significant legal and reputational risks to entities.

Entities have a responsibility to respect human rights in their operations and supply chains, as outlined in the *United Nations Guiding Principles on Business and Human Rights*. This includes taking steps to assess and address modern slavery risks.

In committing to take action to combat modern slavery in our operations and supply chains, PAE can protect against harm to our business and our clients' businesses and improve the integrity and quality of our supply chains, and our client's supply chains.

Our Structure and Operations

Pacific Asia Express Pty Ltd (ACN 051 866 409) (PAE) is an independent Shipping Agency and Logistics Company. PAE employs 90 people working out of our offices located in most major Australian port cities, including Darwin and Townsville.

PAE acts as the local Shipping Agent for the following major Shipping lines: Pacific International Lines (PIL), Mariana Express (MELL) and Toyofuji Shipping (TFS). In acting as the local agent of PIL, MELL and TFS, PAE engages with and utilises suppliers that are contractually engaged by PIL, MELL and TFS.

PAE operations involve the management of over 100 monthly port calls around Australia, comprising of Container Ships, Multi-Purpose and RORO vessels, catering for refrigerated containerised cargo, car transportation, break bulk as well as general and project cargo.

PAE shares many business resources such as Human Resources, Information Technology, Finance, Purchasing, and Risk and Compliance with AAW Global Logistics Pty Ltd (AAW), another reporting entity under the Modern Slavery Act, such that many elements of this statement are similar to AAW's statement lodged on 16 December 2022.

PAE outsources a small portion of our operations and accounting functions to an offshore team based in the Philippines and, more recently, Malaysia.

Our People

PAE had 90 employees across our operations as at December 31, 2022, including casual, shared services, and employees on parental and extended leave. As part of our HR Policy, we use only reputable recruitment firms and follow all applicable laws and regulations. We regularly review our recruitment procedures and recruitment providers to ensure a transparent and fair hiring process that can assist HR personnel to select the right candidate based on merit and job fit, as well as to avoid discriminatory behaviour at all stages of the overall recruitment process.

As an employer, PAE takes steps to ensure that all new team members are appropriately qualified and authorised to work in Australia. Remuneration is determined by considering the skills and experience required to safely perform the role, current market salary data, the applicable Modern Awards, and parity with colleagues performing the same or similar role. Salaries are reviewed on an annual basis to ensure that employees are compensated fairly and appropriately for their time and efforts, as well as their skill development.

PAE recognises that our most valuable asset is our people, so we prioritise employee welfare by encouraging and promoting a supportive work environment, offering well-being programmes and workplace flexibility. Cultivating a culture of continuous learning in our workplace has become a business imperative. Our primary HR goal remains to provide people with the necessary skills, tools, and support to do their jobs, as well as opportunities for advancement.

All our employees have access to grievance channels through which they can express their concerns, through WHS incident reporting, Working Together Policies, and our whistleblowing mechanisms. PAE is committed to protecting employees who report wrongdoing and will ensure that all disclosures made in accordance with whistleblowing procedures are treated confidentially and without fear of retaliation.

Our Supply Chain

As a Shipping Agency and Logistics Company, we have established business relationships with our suppliers in order to provide our customers with access to the highest levels of service and efficiency in the transit of their goods.

At PAE, we understand the importance of human rights and dignity, and are committed to working with likeminded businesses, so that we do not intentionally contribute to modern slavery as we carry out our role as a player in the international supply chain. PAE's supply chains include:

Services that contribute to its operations such as the cleaning, catering, security, office equipment maintenance, utilities, IT, telecommunication that service PAE's offices. These service providers are located almost exclusively in Australia.

Partners that contribute to the services PAE offers its clients, including stevedoring companies, sea pilots, tug operators, seaports, trucking companies, storage and logistics companies. 99.94 % of our suppliers are based in Australia. Our small number of overseas suppliers are based in China and provide transport and logistics services.

Suppliers of goods to PAE that are not for resale to our clients, such as suppliers of equipment, packaging materials, office stationery, PPE, promotional products. These suppliers are located in Australia.

Suppliers of professional services to PAE that are not for resale to our clients, such as suppliers of education and training, consulting and financial services. These suppliers are located in Australia.

Risks of Modern Slavery in our Operations

Operations Risks

PAEs continued to operate solely in Australia in FY2022, where there is a lower geographical risk of modern slavery; however, we acknowledge that modern slavery does occur in Australia, particularly in relation to vulnerable workers, migrants, and/or workers in low-skilled positions or in casualized or insecure forms of work.

PAE continues to deploy a small percentage of its operations and accounting functions to the Philippines, which has a high geographic risk of modern slavery, and to Malaysia, which has a medium risk according to the Global Slavery Index. Our outsourced operations in the Philippines provides PAE with entry level clerical services. PAE's operations in the Philippines are not in an industry identified by the Global Slavery Index as being an industry with a risk of modern slavery, however PAE is cognisant of the elevated risks in this aspect of our operations. PAE conducts visits to the Philippine office twice a year on average, which enables us to observe workplace conditions. The ability to conduct site audits during the pandemic was restricted. This reporting year, representatives from our Australian offices visited our service providers in Manila, Philippines from 1st to 5th August 2022 for a variety of engagement activities.

Labour Risks

During this reporting period, PAE continued to engage workers as permanent full-time employees. Our employees are based in Australia and perform office-based duties. All permanent staff are employed on individual contracts with a Guarantee of Annual Earnings in line with Modern Award requirements.

Whilst we do acknowledge that modern slavery can occur in Australia, 100% of our employees are professional skilled workers, which reduces the risks of modern slavery.



Recruitment Risks

In relation to deceptive recruitment practices, we acknowledge that modern slavery risks are prevalent in this area, even in Australia. In FY2022, PAE continued to engage temporary workers through labour hire agencies, but only through agencies who are members of Australian recruitment industry associations such as corporate AHRI and RCSA. Labour hire providers are also required to be licensed in several Australian jurisdictions. Workers sourced through labour hire agencies are engaged in Australia to perform administrative support duties for PAE. The entitlements for all temporary labour hire appointments are confirmed in writing, regardless of the type of work an individual is engaged to undertake. From Jan'22 labour sourced through labour hire providers have been provided with a copy of PAE's Whistleblower Policy, which includes a mechanism for reporting modern slavery, and will be included in upcoming Culture and Pulse Surveys.

PAE utilises the services of reputable recruitment agencies to assist with placement of temporary and permanent appointments. We acknowledge the inherent risks of outsourcing recruitment and confirm that agencies engaged by PAE do not charge fees to prospective or successful employees. As an added control, PAE updated its recruitment checklist to enhance controls and mitigate the risk of recruitment agencies charging fees to prospective or successful employees.

Risks of Modern Slavery in our Supply Chain

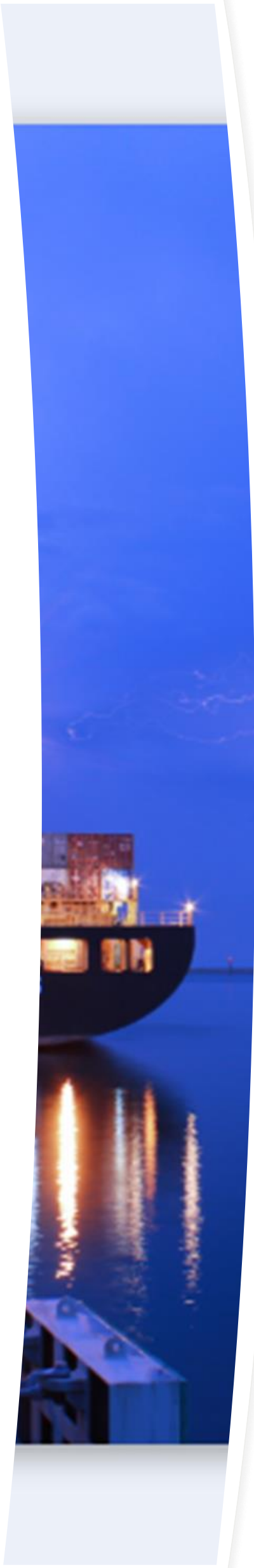
PAE utilises cleaning, catering, and security services for our Australian offices through contracting arrangements with companies who supply these services. While the workers are located in Australia, PAE acknowledges that these industries are more vulnerable to modern slavery even within Australia. Workers may come from vulnerable groups, such as low-skilled workers and those from migrant, low-income, or culturally and linguistically diverse backgrounds. If not managed properly, this increases the risk of potential modern slavery practises.

PAE uses IT support services for our operations, which are provided by a contracting arrangement company. While the companies we work with are based in Australia, their employees may be located in other countries, posing a geographical risk of modern slavery. PAE has limited visibility into this supply chain, which may be looked into further in future reporting periods.

PAE procures giftware promotional products, office supplies and uniforms which may be manufactured in various locations outside Australia, however they are purchased locally in Australia and from reputable office supplies stores and promotional merchandising suppliers. PAE does not have much visibility over this supply chain, however noting that supply chains related to uniforms and branded products may have a high risk of modern slavery, these supply chains will need to be investigated further.

PAE engages the following Australian service providers:

- stevedoring companies to manage loading and unloading of general and containerised cargo,
- sea pilots to manage safe passage of our principals' ships,
- tug operators to manage towage and marine related services,
- seaports as a place to unload or load goods from a vessel,
- trucking companies to transport goods from and to ports, and
- storage and logistics companies for safe storing of goods for its clients.



As 99.94% of PAE's total expenditure in relation to the above supply chains is paid to companies based in Australia, where strong regulation and good business governance prevail, the overall risk of modern slavery in the first tier of PAE's supply chain is relatively low (tier 1 suppliers are those that deal directly with PAE). These tier 1 suppliers are also not within industries identified as at risk of modern slavery in Australia. However, many of those suppliers are likely to source goods and services from higher risk jurisdictions, and we are continuing to develop an understanding of our supply chain in order to identify those risks.

In Australia, many workers in the maritime transport industry, including stevedores and port workers, are union members, which facilitates collective bargaining in relation to workplace issues, and reduces the risks of modern slavery occurring in Australia in these professions.

Sea pilots are professional, highly skilled workers, and therefore PAE assesses the risks of modern slavery to be low in relation to this supply chain in Australia.

Many of our largest suppliers in this space are themselves reporting entities under the Modern Slavery Act or have issued their own publicly available statements with respect to modern slavery. PAE will monitor these reports, and the risks of modern slavery disclosed in such reports, in future reporting periods to assess modern slavery risks in these supply chains, and the work that is being undertaken by these suppliers to address those risks.

PAE acknowledges that, as a link of the global supply chain network, our supply chains are lengthy, and we have limited visibility and minimal ability to exert control, particularly in circumstances where key suppliers are far larger than PAE. Some of these larger suppliers have made public commitments regarding human rights and modern slavery, and many are likely to be reporting entities under the Act. Notwithstanding this, PAE will endeavour to leverage its longstanding business relationships with larger entities in this industry with a view to encouraging a similar focus on modern slavery.

We have prioritised the risk review of Tier 1 suppliers for this reporting period and are committed to working with our Tier 1 suppliers to assess and address risks of modern slavery further down our supply chains in subsequent periods. This process will be targeted initially at offshore processing services providers, and our key suppliers as we have identified that these supply chains might carry the greatest risk of modern slavery. PAE believes it could have an impact on these suppliers and effect change.

Our Actions

“Our team is what makes us different and binds us together as one strong unit. We are committed to a positive, multicultural, safe and friendly working environment where all people are valued.”

- Chief Human Resource Officer



Policies and Standards

PAE has taken steps to address risks of modern slavery within our business and supply chain through the implementation of policies and procedures. PAE will continue to build on these actions, and any new policies that are implemented will be included in subsequent reporting periods. The most important policies and procedures that we have in place, as well as the steps we have taken to mitigate the risks of modern slavery, are outlined below:



▪ ***Bullying, Harassment, and Discrimination Policy***

PAE is committed to preventing bullying, harassment and discrimination and has implemented policies that reflect the company's commitment to provide a safe and healthy work environment. Workplace bullying and harassment will not be tolerated under any conditions.

This policy outlines PAE's commitment to a safe workplace and is intended to ensure, to the greatest extent possible, that employees are not subjected to any form of bullying, harassment, or discrimination while at work. This policy will be updated in the next reporting period to reflect changes to the Fair Work Act.

▪ ***Whistleblower Protections Policy***

We are committed to promoting a culture of open and honest communication, corporate compliance, and governance. As part of that commitment, PAE has had a Whistleblower Protections Policy in place for a number of years now. This policy serves as a confidential reporting mechanism through which people within and outside our business can register concerns or file reports about any suspected misconduct or an improper state of affairs including unethical, illegal, or other inappropriate conduct.

The policy explicitly mentions modern slavery and has been made more accessible to the community and workers of our suppliers (and their suppliers) for the aim of reporting modern slavery risks or concerns directly to PAE so that they can be addressed and resolved. The Policy is available to all employees via our intranet and employee handbook, and to the general public via our [website](#). During the reporting period, we did not receive a Whistleblower report.

▪ ***Flexibility at Work Policy***

To continue to support our employees to better balance work and their personal life and responsibilities, all employees who have completed their training period can access flexible arrangements through the Flexibility at Work Policy.

This initiative builds on our commitment to improve the retention of our staff and their well-being, support diversity and continue to build on our people-first strategy.

This reporting year, we updated this policy and the Work from Home checklist to monitor the risks associated with working from home. The checklist was distributed to all employees and is completed annually to continuously evaluate the home environment as a safe place to work.

▪ ***Working Together Policy***

The Company respects every employee's right to be treated with dignity, respect, and courtesy. Employees should be able to come to work in an environment that reflects harmony, safety, and security, and that is free of harassment and discrimination, and the Company will make every effort to ensure that this happens.

As part of this commitment, PAE reviewed and updated our Working Together Policy to ensure that the Company provides a safe and healthy working environment. The Policy is available to all employees via our intranet and is referenced in our Employee Handbook.

▪ ***Equal Employment Opportunity (EEO) Policy***

The Company is committed to providing equal opportunities for all applicants and employees of the Company, in all areas of employment, and in the terms and conditions of employment, regardless of sex, race, marital status, political or religious beliefs, or other protected characteristic.

Company policy requires that Equal Employment Opportunities will be provided in all aspects of employment including recruitment, promotions remuneration and other terms and conditions of employment.

▪ ***Modern Slavery Policy***

PAE is committed to protecting our employees' rights and maintaining the highest human rights, ethical, and modern slavery standards.

During this reporting period we further developed our Modern Slavery Policy, which re-affirms the Company's commitment to contributing to the abolition of all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

The Modern Slavery Policy is published on our intranet for our employees, and on our [website](#) for the outsourced teams in the Philippines and Malaysia and the general public. In FY22, PAE did not receive any reports of modern slavery in our operations or supply chains.

▪ **Employee Code of Conduct Policy**

We drafted an employee code of conduct policy this year. This is an important document that explains to employees the standard of behaviour expected of them, and how the company intends to conduct business. It aids in the avoidance of ambiguity in staff expectations and the prevention of inappropriate behaviour. It also fosters a positive ethical culture in which all employees are treated equally and with respect. This policy will be communicated to new and existing staff during the 2023 reporting period.

□ **Hours of Work Policy**

This year, we began developing an Hours of Work Policy to provide a guideline for the provision of fair and equitable working hours, work allocation, and work arrangements, as well as to ensure that Employees are aware of, and able of fulfilling, their responsibilities in relation to their employment with the Company. During the reporting period we also updated our employment agreements to clearly reflect the scope of ordinary business hours, and the expectations of our staff with regard to working hours.

▪ **Employee Handbook**

The handbook is a valuable tool for developing, strengthening, and changing our organisation's culture, and it reflects our commitment to the promotion and protection of human rights based on the principles of dignity, equality, and mutual respect. It includes standards, policies, and employee expectations, in order to comply with Australian workplace regulations. We amended the Employee Handbook this reporting year to incorporate information regarding modern slavery and PAE's commitment to tackling the risks of modern slavery within its operations and supply chains.

□ **Culture and Pulse surveys**

PAE's objective in past reporting years was to implement an employee survey in order to gather anonymous feedback from our employees to assist PAE in identifying and addressing risks of gender disparity, harassment, coercion, bullying, control, or exploitation within our operations. This initiative has been postponed due to the pandemic but have progressed this reporting year by conducting a survey with a small group of employees as well as implementing a survey for new employees that provides an opportunity for feedback of their recruitment experience, and first 3 months of employment.

Recruitment

PAE has continued its practice of engaging recruitment providers and employment agencies predominantly in relation to senior or specialist roles. Engagement of recruitment agencies requires prior approval from the Commercial Director (expense approval) and agency selection and commercial relationship is approved and managed by the Chief Human Resources Officer.

By limiting the use of recruitment agencies to senior, specialist and difficult-to-fill roles that are well remunerated and skilled, this reduces the risk of PAE contributing to modern slavery in its operations through deceptive recruitment practices on the part of recruitment agents. PAE executes an annual salary audit to monitor compliance with employment agreements and ensure all staff are receiving above the National Minimum Wage or Award Wage (where relevant).



Visits To Outsourced Team in The Philippines

Due to Covid and related travel restrictions, our team was not able to travel and conduct site visits during the past two years.

This reporting year, representatives from our Australian offices visited our service providers in Manila, Philippines from 1st to 5th August 2022 for a variety of engagement activities. In addition to general and specific user training, we were able to provide IT support, assess the working conditions of the offices and the well being of the staff. All items assessed during the visit were deemed to be above standard. The next site visit is scheduled for mid 2023.

Internship

PAE has established relationships with several Australian tertiary institutions, periodically offering internships to students, and has historically provided work experience to high school students. In these circumstances, students are engaged under the terms and conditions set by their university or the relevant Education department.

Interns who are observing and learning as part of a student or vocational placement are ordinarily not paid, however interns who are undertaking productive work and delivering a commercial benefit are remunerated, consistent with Australia's workplace laws.

During the reporting period, PAE did not provide any internships or work experience placements.





Due Diligence

As part of our commitment to maintain PAE's ethics and integrity in business practices, we continue to monitor and review our internal processes and policies. We follow our responsible recruitment practises, which include stringent pre-employment checks for all employees, such as background checks, employment history, and confirmation of appropriate work rights.

We engage reputable labour hire agencies and follow the same process before engaging new hires, in which we identify the type of work to be outsourced, check against relevant Awards, and ensure individuals are remunerated in accordance with the relevant Award; if the Award is not applicable, we review current market rates to ensure individuals are paid a competitive rate when compared to their peers.

With the assistance of our consultants, we developed a Supplier Risk Assessment process in FY20 to assist us in identifying and managing the risks of modern slavery in our supply chain. During this reporting period, we used the same process to evaluate our Tier 1 Suppliers.

We continued to work on revising our procurement procedure, which will ensure that when we engage these service providers, they have been pre-screened and have undergone due diligence procedures. PAE is looking for ways to incorporate ethical sourcing into our procurement practises and developing a new Procurement Policy and Supplier Code of Conduct. We anticipate that the new procedure and policies will be implemented and adopted during the upcoming reporting period.

All of our suppliers are required to comply with applicable laws and regulations, including the Modern Slavery Act, as well as policies and standards governing ethical business practises, safety, and the environment. Suppliers are obligated to ensure that all employees and contractors working for them are legally allowed to work and that no forms of slavery or human trafficking are evident in the products and services they provide to PAE:

- PAE has agency agreements with our strategic partners, and offshore processing services, and prior to entering into these agreements, it conducts financial, human resource, and regulatory due diligence. This reporting year, we modified our existing agreement to incorporate provisions regarding modern slavery and communicated this change to our offshore processing service providers.
- PAE has vendor agreements with overseas and local suppliers that have been modified to include specific references to the vendor(s)' working conditions or concerns about modern slavery. This form is given to all new vendors. PAE has begun to explore a solution to transition existing vendors to the new vendor agreement, which will continue into the next reporting period.



Monitoring and Reporting

Our efforts to prevent modern slavery continue, with the working group meeting on a regular basis throughout the reporting period. The initiative is still fully supported by the policy owners, finance team, Group Risk & Compliance Manager, Chief Human Resource Officer, and Chief Financial Officer.


PAE has defined a framework that includes metrics that will allow the Company to track the effectiveness of its due diligence actions and report on our impact during the reporting period. Furthermore, modern slavery reporting is included as a standing agenda item at every board and executive meeting.

Training of Staff

Last reporting year, we engaged external providers to develop a Modern Slavery Training Program to increase awareness among our staff. The training is intended to improve the understanding of human rights and modern slavery responsibilities, as well as our approach to potential risks. The training program is mandatory for all employees including our outsourced team. As of December 29, 2022, 95.78% of our employees had completed the training, with the remaining employees expected to complete it by the end of January 2023. This training was also added as a mandatory learning item for all new hires during their Induction and Probation period.

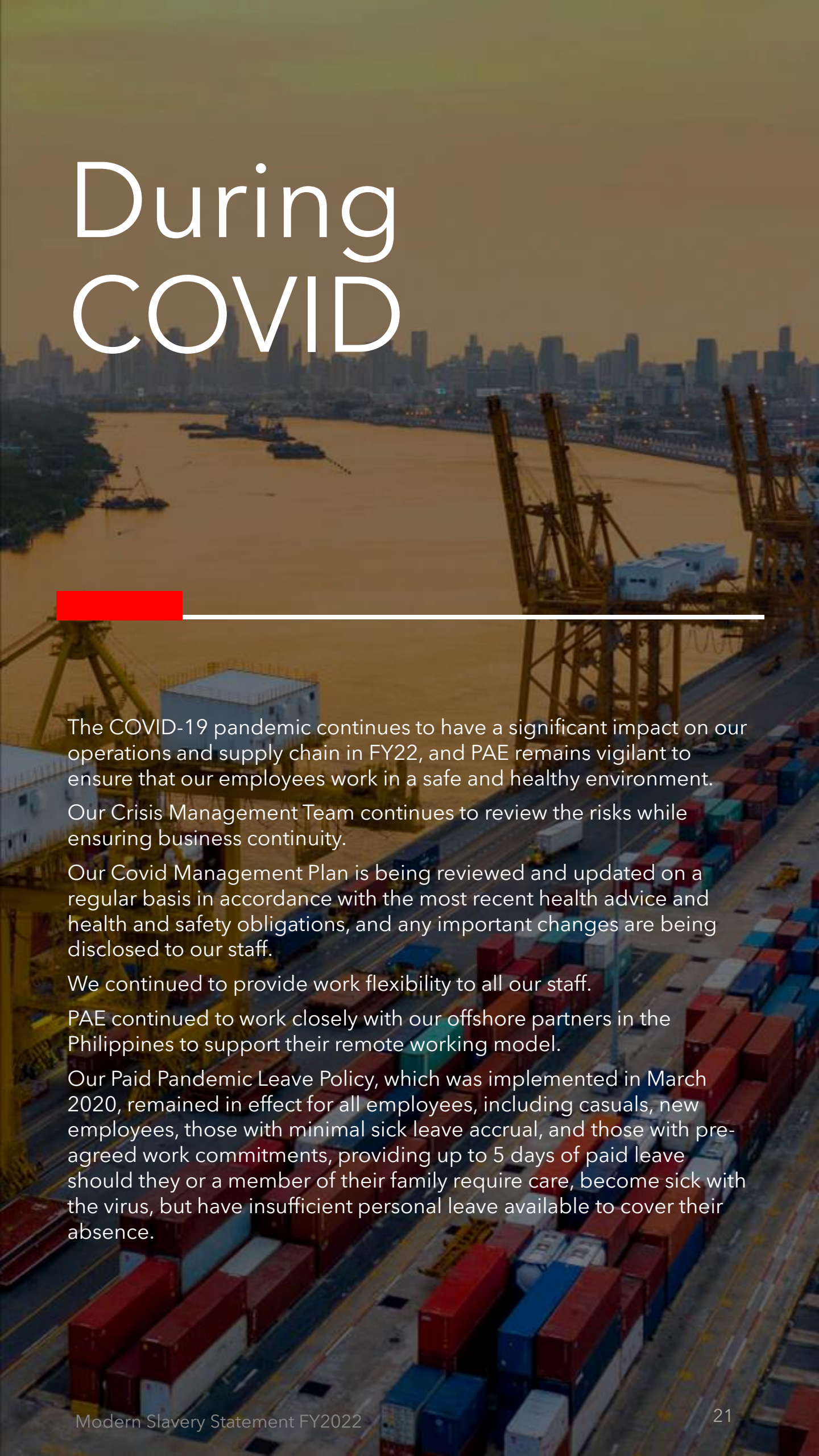


Assessing the Effectiveness of our Actions



PAE is fully committed to upholding the Modern Slavery Act to combat modern slavery. We acknowledge the challenges associated with measuring the effectiveness of our actions, however we are fully committed to continuous improvement. The approach that we use to assess the effectiveness of our actions is shown in the table below.

During COVID

An aerial photograph of a busy port area. In the foreground, there are numerous stacks of colorful shipping containers (red, blue, white) on a paved surface. Several large yellow gantry cranes are visible, extending over the water. In the background, a wide river or harbor is filled with various ships and boats. The city skyline of New York City is visible in the distance under a hazy, overcast sky.

The COVID-19 pandemic continues to have a significant impact on our operations and supply chain in FY22, and PAE remains vigilant to ensure that our employees work in a safe and healthy environment.

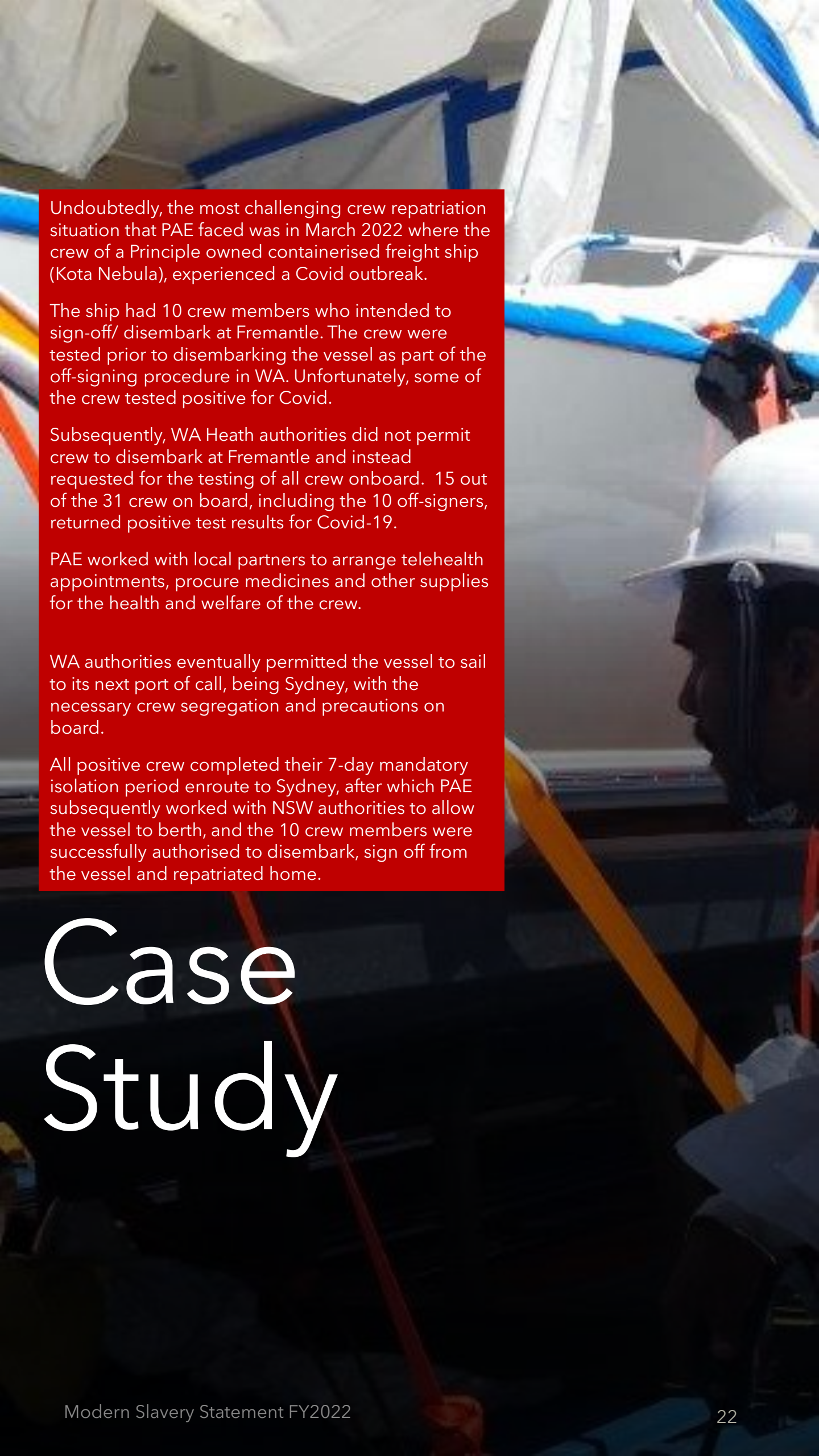
Our Crisis Management Team continues to review the risks while ensuring business continuity.

Our Covid Management Plan is being reviewed and updated on a regular basis in accordance with the most recent health advice and health and safety obligations, and any important changes are being disclosed to our staff.

We continued to provide work flexibility to all our staff.

PAE continued to work closely with our offshore partners in the Philippines to support their remote working model.

Our Paid Pandemic Leave Policy, which was implemented in March 2020, remained in effect for all employees, including casuals, new employees, those with minimal sick leave accrual, and those with pre-agreed work commitments, providing up to 5 days of paid leave should they or a member of their family require care, become sick with the virus, but have insufficient personal leave available to cover their absence.



Undoubtedly, the most challenging crew repatriation situation that PAE faced was in March 2022 where the crew of a Principle owned containerised freight ship (Kota Nebula), experienced a Covid outbreak.

The ship had 10 crew members who intended to sign-off/ disembark at Fremantle. The crew were tested prior to disembarking the vessel as part of the off-signing procedure in WA. Unfortunately, some of the crew tested positive for Covid.

Subsequently, WA Health authorities did not permit crew to disembark at Fremantle and instead requested for the testing of all crew onboard. 15 out of the 31 crew on board, including the 10 off-signers, returned positive test results for Covid-19.

PAE worked with local partners to arrange telehealth appointments, procure medicines and other supplies for the health and welfare of the crew.

WA authorities eventually permitted the vessel to sail to its next port of call, being Sydney, with the necessary crew segregation and precautions on board.

All positive crew completed their 7-day mandatory isolation period enroute to Sydney, after which PAE subsequently worked with NSW authorities to allow the vessel to berth, and the 10 crew members were successfully authorised to disembark, sign off from the vessel and repatriated home.

Case Study

Consultation



PAE is managed as an integrated group with well-structured policies and procedures that are designed to be applied to all entities. In accordance with this model, our consultation process included engagement with our Modern Slavery working group which includes representatives from Finance, Human Resources, Procurement, and Risk and Compliance who are shared resources working across the entities and business groups identified in this statement under the heading “Our Structure and Operations”.

This statement has been reviewed and approved by the Board of Directors on 26 June 2023.

Continuous Improvement

P&A is committed to continually improving our approach to reducing the risk of modern slavery practices in our supply chains and operations and has established the following priorities for FY23:

- Continue to review our existing Policy Framework.
- Continue working on our Procurement Policy and Procedure and Code of Conduct for Suppliers Policy and look at implementing it in FY2023. Implementation of procurement procedure will include supplier risk assessment and surveys, development of preferred supplier list.
- Continue to deliver the developed modern slavery training to all our staff to increase their understanding and awareness.
- Deliver the employee pulse survey to all employees.
- Ensure that all new medium and high-risk suppliers undergo P&A's Supplier Risk Evaluation Process.
- Continue process of transitioning existing vendors to new vendor/agency agreement.
- Publish Modern Slavery Statement by 30th of June each year outlining the steps we have taken to address modern slavery risks



Review of Policies



Supplier Code of Conduct



Training and Awareness



Compliance and Due Diligence



Review of Contracts



Compliance with the Act



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