

global logistics



# **Mandatory Reporting Criteria**

The table below explains how this Statement meets the mandatory reporting criteria set out in the Act.

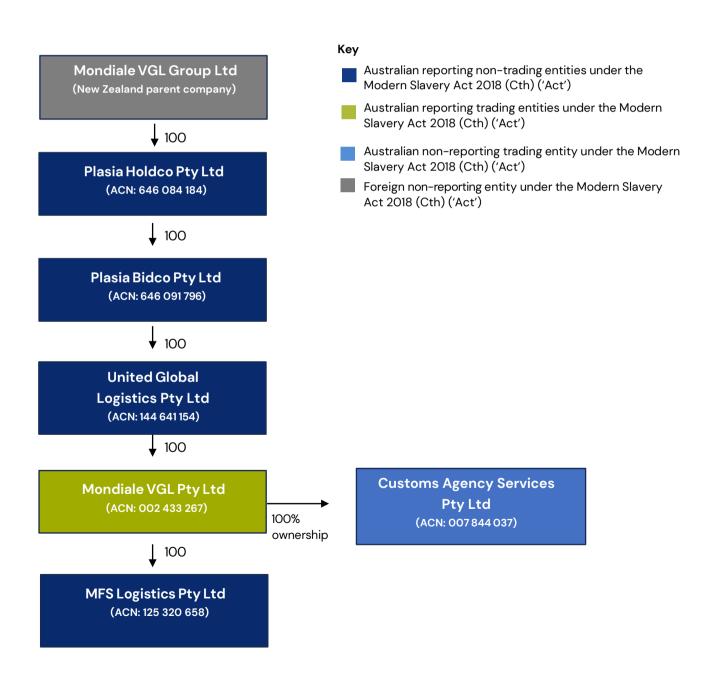
Mandatory Criteria for Modern slavery statements		Reference in this Statement
Criteria 1	Identify the reporting entity	3, 4
Criteria 2	Describe the reporting entity's structure, operations and supply chains	4, 5
Criteria 3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	6
Criteria 4	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	7
Criteria 5	Describe how the reporting entity assesses the effectiveness of these actions	7
Criteria 6	Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	8
Criteria 7	Provide any other relevant information	3-8



Mondiale VGL Group Limited, is a private company in New Zealand and is the parent company of the Plasia Holdco Pty Ltd Australian consolidated group. Additionally, at the end of the reporting period (30 June 2024), Plasia Holdco had wholly and majority-owned subsidiaries in Europe and the United States and minority investments in companies domiciled in Singapore and India.

The Australian Modern Slavery Act 2018 (Cth) requires certain entities to report annually on the risk of modern slavery in their operations and supply chains, and the actions undertaken to address those risks.

This statement is a joint statement covering the following reporting entities (indicated below):





Mondiale VGL Group Limited is the New Zealand based parent company for the global group (the 'MVGL Group') and is not a reporting entity under the Modern Slavery Act 2018 (Cth) ('Act').

Plasia Holdco Pty Ltd, Plasia Bidco Pty Ltd, United Global Logistics Pty Ltd, MFS Logistics Pty Ltd and the Australian trading entity Mondiale VGL Pty Ltd (collectively referred to as 'Mondiale VGL Australia' for the purpose of this statement) are subject to the Act. The Act requires reporting entities subject to the Act to produce an annual Modern Slavery Statement. This statement covers the financial year ended 30 June 2024 (and is accurate as at that date) and is due by 31 December 2024. We have considered how to lodge this statement and have determined that a joint statement is appropriate given the synchronicity of our policies, practices, and many of our suppliers.

Mondiale VGL Australia acquired a 100% stake in Customs Agency Services Pty Ltd ('CAS') during the financial year ended 30 June 2024. CAS takes a strong position on modern slavery and is committed to the principles and intent of the Act but is not a reporting entity under the Act due to its annual revenue not meeting the required level.

The MVGL Group is committed to operating in accordance with its ethical, social, and environmental values and implementing suitable actions accordingly. To achieve this, the MVGL Group has implemented policies and practices to support robust compliance practices within its own business and encourages suppliers to do the same.

## **Structure and Operations**

Mondiale VGL Australia is one of Australia's largest import sea freight forwarding companies and the MVGL Group operates an extensive global network across 60 locations in 19 countries including:

Locations of MVGL Group Wholly Owned or Majority Owned Subsidiaries (as at 30 June 2024):

- Australia
- Belgium
- China
- Denmark

- Germany
- Hong Kong
- Italy
- Netherlands

- New Zealand
- Philippines
- Spain
- Switzerland

- Turkey
- USA

Minority Investments in Associate Businesses

- India
- Singapore

The Company employs 500 people in Australia and the MVGL Group employees 1,500 globally. All operations are overseen by executives based in New Zealand, Australia, and Italy. New Zealand, Australia and Italy are each considered to have a low prevalence of modern slavery and governments that take strong actions against it.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Walk Free 2023 Global Slavery Index, available from https://www.walkfree.org/global-slavery-index/downloads/



Within Australia, the Company provides a fully integrated logistics solution including forwarding, clearance, warehouse, distribution, and cartage. We also provide a range of freight forwarding services in our global locations.



## **Supply Chain**

Our supply chain includes the purchase of shipping line services, and of products and services needed for the business' day-to-day operations including office supplies, employment and training of staff, labour hire agencies, cleaners, external professional advisers, leasing of rental space, IT infrastructure and support services and travel. Within Australia and New Zealand our supply chain also includes the purchase of property, plant and equipment to support our transport and warehousing divisions.

The MVGL Group has established various policies, including our Supplier Code of Conduct, that guide our operations and help staff and suppliers (including any agencies who provide labour) understand Mondiale VGL Group's core values and expectations regarding ethical dealings.

### Policies in relation to Modern Slavery

The MVGL Group is committed to working to prevent modern slavery and human trafficking in our business and supply chain. We have implemented a Modern Slavery Policy, Human Rights Policy and Supplier Code of Conduct which cover, among other things, our expectations in relation to human and labour rights. We value and observe applicable laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity.

As part of our Supplier Code of Conduct, we expect our suppliers to operate in accordance with applicable laws, including those prohibiting human slavery and slavery-like practices, human trafficking, and child labour.

Mondiale VGL Australia maintains an Employee Code of Conduct which sets out certain standards of behaviour to assist its directors, officers, employees, and contractors in proper ethical and legal decision–making when representing the business and performing their day-to-day duties. Our Code is provided to all Australian employees upon commencement of employment. Employees are required to comply with this Code of Conduct and other Group policies.



A whistleblower policy and reporting programme operated by an independent provider is in place to encourage employees to report any concerns, suspicion or knowledge of any instance of human trafficking, forced labour or debt servitude.

We have subscribed to a Learning Management System (LMS) that includes Australian-focused modern slavery awareness training for employees and managers.

We are a participant in the EcoVadis global sustainability rating programme which uses a comprehensive methodology to rate organisations on their environmental, labour and human rights, ethics and sustainable procurement performance. The company is in its second year of participation and achieved a bronze rating in 2024 which places MVGL Group in the top 35% of companies rated by the EcoVadis platform globally.

We continue to review the MVGL Group's practices and policies on an annual basis and update as necessary.

## **Potential Modern Slavery Risks**

#### **Business Operations**

The MVGL Group's business is predominantly an office-based, service business, with the majority (74%) of its workforce located in countries reported as having a low prevalence of modern slavery and governments that take strong actions against it.<sup>1</sup>

The Australian operations also have warehousing and transport offerings, where labour hire companies may be used to resource those functions in limited circumstances.

The MVGL Group endeavours to only engage reputable labour hire companies that are required to meet certain screening criteria and satisfy the terms of our Supplier Code of Conduct. Those workers carry out their role under the oversight of Mondiale VGL Australia senior managers.

#### Geographical

The majority of our MVGL Group operations by employees and by revenue are Australasian, but we do have Group offices in higher ranking countries for modern slavery<sup>1</sup>, such as Turkey and the Philippines. As previously noted, these operations are overseen by New Zealand, Australian and Italian executives and the New Zealand-based Head Office provides shared services oversight for the finance, human resources and compliance functions. These operations in higher-ranking countries are office-based businesses.

#### Supply Chain

There is a risk of modern slavery in our supply chain because some work performed by suppliers may be performed remotely, at sea and outside of normal business hours, including at night. This makes it more difficult to oversee the performance of work and working conditions.

However, we seek to only engage with reputable shipping, transportation, labour hire, IT services companies and cleaners, most of which have established modern slavery compliance programmes in place.

We also note various transactional risks within our supply chain, particularly through the sourcing of IT supplies and equipment manufacturing.



Our MVGL Group has arm's-length commercial relationships in place with its suppliers. This means that our suppliers may be engaged in modern slavery practice, and we are not aware of that fact. However, were we to become aware of any modern slavery practices, we would take immediate action to address them.

We have in place a Supplier Code of Conduct that we expect our suppliers to adhere to.

## Actions Taken to Assess and Address the Risk of Modern Slavery

As part of our approach to assessing and addressing any modern slavery risks, we have completed the following steps over the financial year ending 30 June 2024.

- 1. Developed a global human rights policy, to accompany our modern slavery policy, to apply to our operations and supply chains.
- 2. Undertook modern slavery awareness training for Australasian employees and managers.
- 3. Continued to conduct due diligence on local and global supply chains using surveys and reviews of available supplier policies and practices. We continue to target our larger suppliers and those in assessed risk areas for review.
- 4. Addressed any potential modern slavery risks that were identified as a result of the above due diligence processes.
- 5. Mondiale VGL Australia's modern slavery policies and practices were rolled out to Customs Agency Services (CAS) for consistency across the MVGL Group's Australian entities.

## Actions planned to Assess and Address the Risk of Modern Slavery for 2025

- 1. Automate our third-party supplier screening and modern slavery assessments for global suppliers.
- 2. Proactively push Mondiale VGL Supplier Code of Conduct to our suppliers through inclusion in modern slavery surveys.
- 3. Roll out additional ethical compliance learning modules for all staff globally.

### **Assessment & Effectiveness of our Actions**

Given that we have assessed the risks within our direct organisation as relatively low, our priority is to work with current and future suppliers to monitor the steps they are taking to assess and address modern slavery risks in their organisations and supply chains and automate screening of our supply chain. Part of the assessment will also include tracking the actions we take over the next financial year and regularly reviewing our current actions.

Using questionnaires provided to suppliers and global controlled entities we are also able to identify any areas which need further attention internally and develop policies and solutions to decrease the risks of modern slavery in these areas.



### Consultation Process with Entities Owned or Controlled

We have notified our global subsidiaries regarding requirements under the Modern Slavery Act and have endeavoured to extend and implement similar actions and policies across the Group.

Mondiale VGL Group Ltd consulted with key officers of the reporting entities in the preparation of this statement. The Mondiale VGL Group Ltd Directors and the Group CEO reviewed and provided input into this Statement.

#### Statement

This Modern Slavery Statement was approved by Mondiale VGL Group Limited's Board of Directors on 11 December 2024.

Justine Smyth, CNZM

Chair

Mondiale VGL Pty Limited