

Toll Global Express

FY22 Modern Slavery Statement

1. Reporting Entities and Structure

This Modern Slavery Statement (**Statement**) is a joint statement made by Toll Global Express in respect of the reporting period ended 31 March 2022 for the following reporting entities:

- Australian Parcels Group Pty Ltd (ACN 649 001 409);
- Australian Parcels Pty Ltd (ACN 649 001 418); and
- IPEC Pty Ltd (ACN 084 157 666),

(together, referred to as the **Australian Parcels Group**),

- Strait Link Australia Holdings Pty Ltd (ACN 649 025 963);
- Strait Link Australia Pty Ltd (ACN 649 026 059); and
- TasLink Logistics Pty Ltd (ACN 138 616 645),

(together, referred to as the **Tasmania Group**),

- Strait Link QS Holdings Pty Ltd (ACN 649 023 638); and
- Strait Link QS Pty Ltd (ACN 649 025 614),

(together, referred to as the **Shipping Group**).

For the purposes of this Statement, Toll Global Express refers to the Australian Parcels Group, the Tasmania Group and the Shipping Group.

Each reporting entity is an Australian private company.

This Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) and outlines the actions taken by Toll Global Express since the acquisition by Allegro Funds and during the reporting period to identify and address modern slavery risks across our supply chain and operations. This Statement also outlines our plans for the next reporting period.

With effect from 31 August 2021, Allegro Funds successfully acquired Toll Global Express (specifically IPEC Pty Ltd, Strait Link Australia Pty Ltd and Strait Link QS Pty Ltd) from Toll Holdings Limited and Japan Post.

Following the acquisition of Toll Global Express, we have been focussed on transformation of the business and we are in the formative stages of developing our modern slavery program of work as a standalone business.

2. Purpose and Values

Following the reporting period, we launched our vision, mission, purpose and values which guide the behaviours of our people. The values were developed in consultation with employees across the business and were endorsed by the Executive Leadership Team.

Vision: To be the leader in sustainable logistics

Mission: To be the logistics partner of choice, delivered through superior sustainable products and services

Purpose: To make sure life never stops

Values:

1. Strive together as a **united** team
2. **Respect** everyone
3. Share a **passion** for success

3. Operations

Toll Global Express offers unique, innovative and tailored solutions across road, rail, air and sea, providing transport, logistics and business solutions to our customers across Australia and New Zealand. Toll Global Express comprises the following business units:

- Intermodal and Specialised, including Linehaul
- Palletised Express
- Express Parcels
- Courier
- Tasmania
- Shipping
- New Zealand¹

As at 31 March 2022, the direct workforce of our reporting entities comprised approximately 7,600 employees, with 100% of employees based in Australia.

4. Supply Chain

Across our multimodal logistics network, we work with an extensive network of suppliers, subcontractors and agents.

During the reporting period, our reporting entities procured approximately \$2.33 billion of goods and services from approximately 7,700 direct suppliers, including approximately 3,700 subcontractors. Approximately 99.5% of total spend from our reporting entities was with direct suppliers located in Australia, with our highest spend category being subcontractors. We acknowledge that our direct suppliers may have operations in or may source goods or services from other jurisdictions which may have a higher risk for modern slavery.

¹ The services are provided by companies incorporated in New Zealand that are not reporting entities for the purposes of the Act. The New Zealand companies do not carry on business in Australia.

5. Modern Slavery Risks

Modern slavery practices for the purposes of the Act include trafficking in persons, slavery, slavery-like practices (including forced labour and forced marriage) and the worst forms of child labour.

Modern slavery risk refers to the potential adverse impact that a company can have on an individual or community's labour-related rights.

The key modern slavery risk factors are categorised as follows:

- *vulnerable populations* – groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations.
- *high risk categories* – products and services regarded as having more significant inherent modern slavery risk – including industries that rely heavily on low-skilled labour and/or involve dirty, dangerous and difficult work.
- *high risk geographies* – countries or regions which are known to have higher human rights and modern slavery risks.
- *high risk business models* – business models that rely on third parties for the provision of services, often labour hire.

During the reporting period, we did not identify any instances of modern slavery in our operations or supply chain.

Supply Chain Risks

Following the reporting period, with the support of an external human rights and modern slavery adviser, we completed a hotspot analysis of inherent modern slavery risks in the supply chain of our reporting entities.²

The hotspot analysis identified the following supplier categories with indicative inherent modern slavery risks in our supply chain:

- property services, including cleaning and security
- print, packaging and promotional materials
- fuel and oil
- workwear and personal protective equipment (PPE)
- travel and entertainment
- IT support services and hardware
- tyres
- indirect labour and recruitment, including subcontractors

Toll Global Express recognises that these are not the only areas of modern slavery risk in our supply chain and we will continue to assess our supply chain risks.

² The hotspot analysis did not include the Shipping Group.

Operational Risks

We consider there to be a lower risk of modern slavery in our direct workforce. The direct employees of our reporting entities are based in Australia and are engaged under employment contracts or, for relevant frontline employees, Enterprise Agreements approved by the Fair Work Commission. All employment arrangements are governed by applicable law and employment standards and meet these requirements at an absolute minimum.

As identified through our supplier hotspot analysis (detailed above), we acknowledge that there is an inherent risk of modern slavery in our indirect workforce (eg. contractors, sub-contractors and labour-hire arrangements) which is classified as a high risk business model as we do not have a direct employment relationship with these workers.

We understand that we could also face modern slavery risks through our customer network by transporting or storing items produced using modern slavery. Our Statement for the reporting period ended 31 March 2022 is made in accordance with the Act and therefore focuses on operational and supply chain risks.

Actions to Assess and Address Modern Slavery Risks

We are committed to the highest standards of ethical behaviours in the conduct of our business dealings.

We have in place a range of policies and practices that set the standard of behaviour expected of directors, employees, contractors and third parties (where applicable). A summary of the key policies relating to our management of modern slavery is set out below.

Policy	Description
Anti-bribery and Corruption Policy	This policy sets out our zero tolerance of bribery and corruption and outlines the expectations of directors, employees and third parties to act in accordance with the highest standards of ethical behaviour and to not engage in, and actively prevent, all forms of bribery and corruption.
Anti-human Trafficking and Modern Slavery Policy	This policy sets out our respect for ethical labour practices and values and our zero tolerance approach to any form of modern slavery in our operations and supply chain.
Code of Practice	This code sets out the expected behaviours of our people, including in respect of labour laws and youth or child labour.
Diversity, Inclusion and Equal Employment Opportunity Policy	This policy sets out our commitment to creating and promoting a fair and inclusive workplace promoting diversity, inclusion and equal workforce participation.
Ethical Employment Policy	This policy sets out our position on ethical employment practices, requiring, as a minimum, to work within employment laws in the countries in which we operate and to demonstrate the highest ethical employment practices.

Policy	Description
Health, Safety and Wellbeing Policy	This policy sets out our commitment to the health, safety and wellbeing of our people, customers and the communities in which we serve.
Supplier Code of Practice	This code sets out our expectations of the suppliers we work with, including in respect of labour laws and youth or child labour.
Whistleblower Policy	This policy sets out our commitment to identifying and addressing misconduct, including suspected or actual contraventions of human rights, and encourages the reporting of such conduct safely, securely and without fear of detriment. Throughout the reporting period, an independent hotline was available for the reporting of misconduct with processes in place for the investigation of those reports.
Workplace Behaviours Policy	This policy set out the minimum standard of behaviours expected of employees and contractors.

6. Assessment and Effectiveness of our Actions

We recognise the importance of assessing the effectiveness of our company's Anti-Modern Slavery actions.

We have established a cross functional modern slavery working group comprised of representatives from our ESG, operations, risk, procurement, people and legal teams. This working group will be integral in establishing our actions and monitoring their effectiveness.

7. Future Program of Work

To further our commitment to addressing modern slavery risks within our supply chain and operations, we have engaged an external human rights and modern slavery adviser to assist us with our modern slavery program of work for future reporting periods, including:

- prioritising our actions to address the inherent modern slavery risks identified in our supply chain;
- introducing supplier pre-qualification software;
- developing and rolling out a modern slavery capacity building program for our employees;
- identifying gaps in our approach to assessing and addressing modern slavery risks; and
- developing a roadmap to address the gaps identified in our modern slavery gap analysis.

We will report on the progress of our modern slavery program of work in future reporting periods.

8. Consultation and Approval

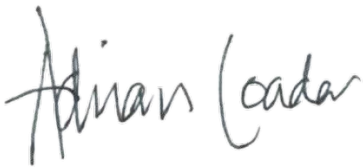
This Statement was prepared in consultation with each reporting entity and the entities they own and control.

This Statement was approved by the following Boards (as the higher entity for the reporting entities within each group within the meaning of the Act):

- The Board of Australian Parcels Group Pty Ltd for the Australian Parcels Group
- The Board of Strait Link Australia Holdings Pty Ltd for the Tasmania Group
- The Board of Strait Link QS Holdings Pty Ltd for the Shipping Group



Christine Holgate
Group Chief Executive Officer



Adrian Loader
Chairman, Australian Parcels Group



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Chairman, Tasmania and Shipping Groups