

Freightways Modern Slavery Statement

1 July 2024 – 30 June 2025

About this Statement

Freightways Group Limited ("**Freightways**"), a New Zealand company listed on the New Zealand and Australian Stock Exchange, has operations in both New Zealand and Australia, across four core market segments, namely, express package and business mail, temperature controlled, information management and waste renewal.



EXPRESS PACKAGE
AND BUSINESS MAIL



TEMPERATURE
CONTROLLED



INFORMATION
MANAGEMENT



WASTE
RENEWAL

- In Australia, Freightways operates in each of these core market segments other than business mail and temperature controlled. Freightways owns and operates the following Australian businesses: Allied Express Transport Pty Ltd and Allied Overnight Express Pty Ltd (collectively, "Allied Express"), The Information Management Group Pty Ltd ("**TIMG**"), LitSupport Pty Ltd ("**LitSupport**"), Shred-X Pty Ltd ("**Shred-X**"), Med-X Pty Ltd ("**Med-X**"), Databank Escrow Services Pty Ltd ("**Databank Escrow**"), and Southwest Onsite Data Backup Management Pty Ltd ("**BackOnline**") (the "**Australian Businesses**").
- In New Zealand, Freightways operates in all of these core market segments. Freightways owns and operates the following New Zealand businesses: Big Chill Distribution Limited, Castle Parcels Limited, Fieldair Holdings Limited, Fieldair Engineering Limited, Air Freight NZ Limited, Messenger Services Limited, New Zealand Couriers Limited, New Zealand Document Exchange Limited, Now Couriers Limited, Post Haste Limited, and The Information Management Group (NZ) Limited (the "**New Zealand Businesses**"). It also operates a number of internal service provision companies. Page 8 – 12 of the 2025 [Annual Report](#) contains further details.

Freightways and its subsidiaries are set out in the corporate structure at Appendix 1 (the "**Freightways Group**").

For the purposes of the *Modern Slavery Act 2018* (the "**Act**"), the reporting entities are:

- Freightways Group Limited;
 - Info Management Services Pty Ltd;
 - IMS Group Australia Pty Ltd;
 - Allied Express Transport Pty Ltd; and
 - Allied Overnight Express Pty Ltd
- (collectively, the "**Reporting Entities**").¹

This Statement has been prepared jointly by the Reporting Entities in compliance with Section 14 of the Act.

In March 2025, a Modern Slavery Committee ("**Committee**") was established to help drive the Modern Slavery Program for our businesses in New Zealand. This Committee consisted of the 5 members of the

¹ Freightways Group Limited meets the definition of a reporting entity under section 5 of the Act as it is a foreign registered company with ASIC. Info Management Services Pty Ltd is a reporting entity as it held over \$100 million in consolidated revenue for the entities it owns. Likewise, IMS Group Australia Pty Ltd, Allied Express Transport Pty and Allied Overnight Express Pty Ltd are reporting entities in their own right by virtue of the consolidated revenue of its owned entities.

Executive Team - CFO, General Counsel, GM Express Package, GM Freightways and Head of P&C, support by our AU Group Financial Controller.

The Australia Modern Slavery Working Group (consisting of P&C, Compliance & Finance) operated and met regularly throughout FY25 until August 2025 when the Working Group was replaced by the Committee which now oversees both New Zealand and Australian modern slavery compliance and initiatives.

The preparation of the FY25 Modern Slavery Statement ("**Statement**") was driven by the Committee. Through the Committee, Freightways engaged with the businesses within the Freightways Group in the development of this Statement.

References in this Statement to "**we**", "**us**", "**our**" and any derivatives are references to the Freightways Group unless the context requires otherwise.

This Statement, covering the 12 months ended 30 June 2025 (FY25), was approved by the Board of Directors of Freightways ("**the Board**"), the parent entity, on 27 November 2025.



CEO – Mark Trougher

Date: 27 November 2025



Chairman – Mark Cairns

Date: 27 November 2025

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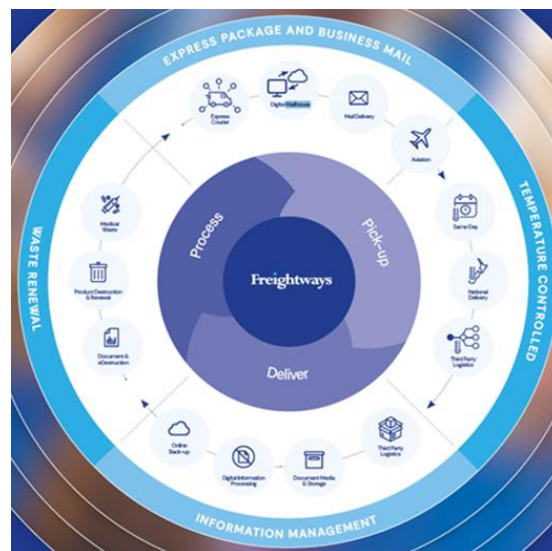
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We recognise that, through our operations, supply chains and business relationships, we need to remain vigilant about and continue our efforts to mitigate modern slavery. This Statement outlines the risks of modern slavery, the measures we have implemented in FY25 and how we plan to achieve continuous improvement.

Our Business

The Freightways Group provides express package and business mail, temperature controlled, information management and waste renewal services in New Zealand and Australia. Ours is a long history of consistent, time-sensitive delivery for New Zealanders and Australians across industries, regions, and borders.

The Freightways Group has always been entrepreneurial. From our core express package and business mail services, we expanded into temperature controlled, information management and waste renewal, building a diverse selection of digital and physical brands in Australia and New Zealand.



Our core capabilities are in pick-up, processing and delivery. Whether it be packages, mail, waste or data, we understand how to perform these tasks efficiently, accurately and at scale.

In FY25, the Freightways Group did not acquire any material businesses in either New Zealand or Australia.

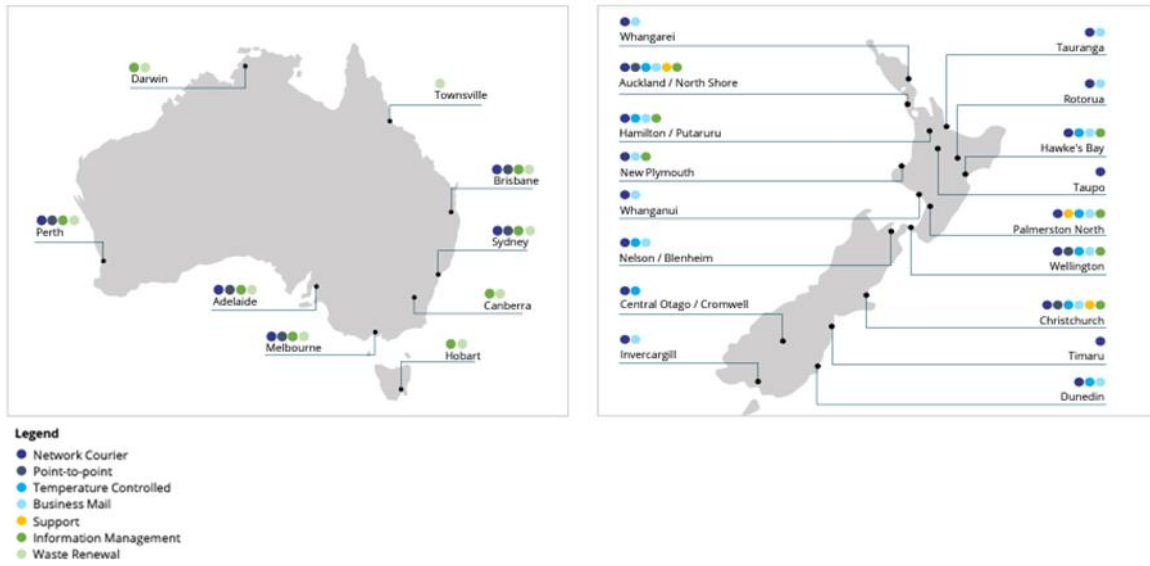
Structure

In FY25, the Freightways Group operated brands across the following market segments:

- **Express package and Business Mail (EP & BM):** New Zealand Couriers, Post Haste, Allied Express, Castle Parcels, NOW Couriers, SUB60, Security Express, Kiwi Express and Oversize, Stuck, Freightways Global, Pass the Parcel, DX Mail and Dataprint.
- **Temperature controlled:** Big Chill Distribution and Produce Pronto
- **Information management:** TIMG, BackOnline, Databank Escrow, Litsupport and Stocka.
- **Waste renewal:** Shred-X, Med-X and TIMG (New Zealand only).

The brands are all supported by a number of internal service provision companies in respect of Information Technology, linehaul, property, treasury and corporate services. Freightways also has an equity share in Upcycled Building Materials Limited (38.5%), Sweetspot Group Limited (33.3%) and Parcelair Limited (50%), all of which are excluded from this Statement given that Freightways does not have majority ownership or control of these entities. An overview of our business structure is provided in Appendix 1, along with the Diagram 1 below which shows our Trans-Tasman footprint.

Diagram 1: Tasman Footprint by service line



Australian Operations

The trading businesses in Australia includes Allied Express, TIMG, LitSupport, BackOnline, Shred-X, Med-X and Databank Escrow. These businesses operate within the express package, information management and waste renewal segments and are responsible for providing a range of services. An overview of these Australian businesses is described in further detail below:

Australian Business / Brand	Location of Operations	Description of Operations
Express Package & Business Mail		
Allied Express	Operating in all states of Australia other than Tasmania	Allied Express is a niche courier and express freight company in Australia with offices in major cities and a fleet of over 600 vehicles. Allied provides a range of B2B and B2C express services including courier and taxi trucks, intra and interstate road and air services, as well as third party logistic. Allied Express partners with an agency network of approximately 50 different partners along with key line haulers and airlines to achieve its national reach. www.alliedexpress.com.au
Information Management		
TIMG	Operating in all states and territories of Australia.	TIMG provides physical storage and information management services, as well as digital information processing services such as digitisation, business process outsourcing, online back-up, escrow services and eDiscovery services. www.timg.com
LitSupport		Litsupport sits within TIMG and helps law firms, corporations and government agencies within Australia find, process and present information, as well as print and copy services.
Waste Renewal		
Shred-X	Operating in all states and territories of Australia.	Shred-X is a national secure destruction provider with top industry accreditations. It offers a Privacy Act compliant service for collecting, transporting, and destroying sensitive data, with extensive

		direct service coverage. The services include document, e-waste, media, hard drive, archive box, purge, textile, and product destruction. Shred-X also provides secure paper, printer waste, and e-waste recycling. www.shred-x.com.au
Med-X	Victoria, New South Wales and Queensland	Med-X Healthcare Solutions (Med-X) provides products and services for the safe and secure handling, treatment and disposal of clinical waste and related services including sharps, washroom and hygiene services and chemical waste and pharmaceutical disposal in Australia. Med-X are committed to exceptional customer service and the development of innovative and sustainable practices. www.med-xsolutions.com.au

New Zealand Operations

The trading businesses in New Zealand includes New Zealand Couriers, Post Haste, Castle Parcels, NOW Couriers, SUB60, Security Express, Kiwi Express and Oversized, STUCK, Freightways Global, Pass the Parcel, Parceline, DX Mail, Dataprint, Big Chill Distribution, Produce Pronto, and TIMG. These businesses operate within the express package and business mail, temperature controlled, information management and waste renewal segments and are responsible for providing a range of services. An overview of these New Zealand businesses is described in further detail below.

New Zealand Business / Brand	Location of Operations	Description of Operations
Express Package & Business Mail		
New Zealand Couriers	Operating throughout New Zealand	New Zealand Couriers is positioned as the premier provider of network courier services to New Zealand businesses. It specialises in express parcel delivery, service standards range from 2.5 hours for local deliveries, to overnight by 9.30am for nationwide deliveries. www.nzcouriers.co.nz
Post Haste	Operating throughout New Zealand	Post Haste is positioned as a mid-market network courier services to New Zealand businesses, offering Freightways customers with a choice in terms of service levels and price point. Post Haste provides local, regional and national overnight deliveries, as well economical (non-urgent) and residential deliveries. www.posthaste.co.nz
Castle Parcels	Operating in Auckland, Wellington & Christchurch	Castle Parcels is positioned to operate in larger parcel distribution market. Castle Parcels is located to serve the non-document needs of businesses around New Zealand. They provide same island next day and inter island 2 day nation-wide services to ensure all urgent parcel needs are met. www.castleparcels.co.nz
NOW Couriers	Operating in Auckland	NOW Couriers complements our Express Package division with New Zealand Couriers, Post Haste and Castle Parcels. Specifically, NOW Couriers services Auckland businesses with national courier needs. www.nowcouriers.co.nz

Sub60	Operating in Auckland, Wellington & Christchurch	SUB60 is a time sensitive courier company in New Zealand. Based in three main cities, SUB60 is positioned to serve the point-to-point courier needs of other nationwide businesses. www.sub60.co.nz
Stuck	Operating throughout New Zealand	Stuck is positioned to service more unusual, hard-to-solve freight requirements in a one-stop logistical shop. Stuck utilises the expertise and horsepower of the Freightways Group to plan and move oversized, uncommon items anywhere in New Zealand and around the world. www.stuck.co.nz
Kiwi Express / Kiwi Oversize	Operating in Auckland, Wellington & Christchurch	Kiwi Express Couriers is positioned in the time-sensitive courier sector. Kiwi Express offers a national courier network as well as point-to-point services. Kiwi Oversize provides courier services for oversized items. www.kiwiexpress.co.nz
Pass the Parcel	SaaS virtual courier service utilising Post Haste network	Pass The Parcel is an online courier solution designed with Kiwi online traders in mind. Backed by Post Haste, Pass the Parcel keeps the courier engagement process simple, providing fast and hassle-free courier services to small businesses. www.passtheparcel.co.nz
Security Express	Operating in Auckland, Wellington & Christchurch	Security Express is the secure-logistics arm of Freightways, serving the security needs of Auckland, Wellington and Christchurch businesses and beyond. www.securityexpress.co.nz
DX Mail	Operating throughout New Zealand	DX Mail is a business mail communication provider, offering services including postal, DX document exchange and volume mail services, facilities management and mail fulfilment solutions. www.dxmail.co.nz
DataPrint	Operating in Auckland	Dataprint offers a combination of conventional and digital mail house solutions, from creation, management to archive. Dataprint supports the needs of enterprise companies that process large volumes of transactional electronic communications. www.dataprint.co.nz
Stocka	Operating in Auckland	Stocka is a third-party logistics (3PL) company that specialises in online fulfilment services for parcel-sized items across a variety of industries. Stocka supports businesses of all sizes and focuses on the secure storage of goods and reliable order fulfilment through the Freightways network. www.stocka.co.nz
Fieldair	Operating in Auckland, Palmerston North and Wellington	Fieldair's primary purpose is to support the operation of a fleet of Boeing 737-400 freight aircraft under the Parcelair joint venture arrangement, which operate nightly dedicated air linehaul services between the North and South Islands. It provides crewing and support services for these aircraft and for external customers including The Life Flight Trust. www.fieldair.co.nz
Parceline Express	Operating throughout New Zealand	An integral part of the Freightways infrastructure, Parceline Express operates our line-haul on all the arterial roads in New Zealand. A vital connector,

		Parceline Express' big trucks provide our brand family with a dedicated daily multi-link to main airports and links between our main centres and the provinces.
Freightways Global	Operating in Auckland	Freightways Global specialises in international e-Commerce freight logistics- inbound into New Zealand and export freight. Freightways Global provides worldwide freight forwarding solutions- via sea or air, integrated with the final mile networks of our Express Package divisions. www.freightwaysglobal.co.nz
Temperature Controlled		
Big Chill	Operating throughout New Zealand	Big Chill provides temperature-controlled transport, specialising in fast moving consumer goods (FMCG) and time critical parcel freight, both chilled and frozen. Big Chill operates a fleet of over 200 temperature-controlled trucks and trailers through its nationwide network of depots and purpose-built cool stores. www.bigchill.co.nz
Produce Pronto	Operating throughout New Zealand. Leverages the Big Chill network for deliveries in some areas.	Produce Pronto provides delivery of fresh fruit, milk, breads and other chilled product to offices, as well as delivery of chilled, frozen and ambient products to service stations across New Zealand. www.producepronto.co.nz
Information Management and Waste Renewal		
TIMG	Operating throughout New Zealand	TIMG helps New Zealand businesses manage their information securely across the entire lifecycle, offering a range of services from document and data storage to intelligent document processing, online backup, and certified destruction of documents, data, and e-waste. www.timg.co.nz

For further details on Freightways operations, refer to the websites noted in the table above and the 2025 Annual Report.

Our Workforce

Our people are fundamental to our business, and we work as a family, prioritising their safety and wellbeing and by doing everything we can to ensure they get home safe each day. We strive to create a workplace that welcomes, acknowledges and values diversity in its people. We see the variety of people who work for us – with their many different skills, beliefs, diverse backgrounds and ways of thinking – as key to our past and future success. As of 30 June 2025, we employed over 4,400 people in New Zealand and Australia across the Freightways Group (Graph 1&2). The majority of our employees are employed on a full-time basis.

Graph 1 & 2: Percentage of workforce by Category and Gender



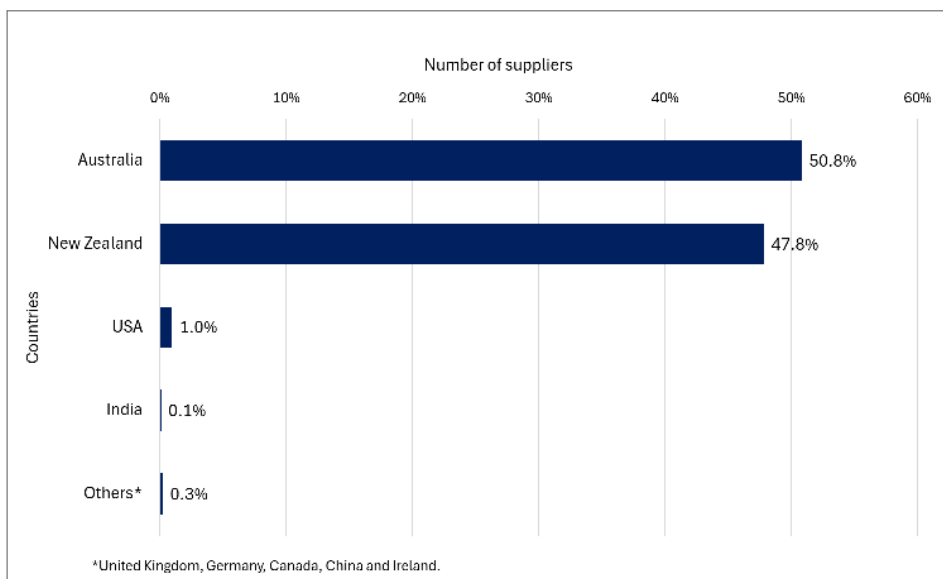
Employees perform roles in a diverse range of functions within the Freightways Group including finance, administration, and office support, compliance, governance and quality assurance, general management, customer service, engineering, maintenance and ground handling, human resources, information and communication technology, digitisation, logistics, processing and warehousing, and sales and marketing.

Our Supply Chain

Freightways’ supply chain includes a large and diverse range of suppliers spanning various countries and industries, as well as independent contractor drivers (“contractors”) (Graph 3). We pride ourselves on our strong supplier and contractor relationships and have worked with many of our suppliers and contractors for over a decade. We believe these strong relationships are essential for collaborative and effective risk management within the supply chain.

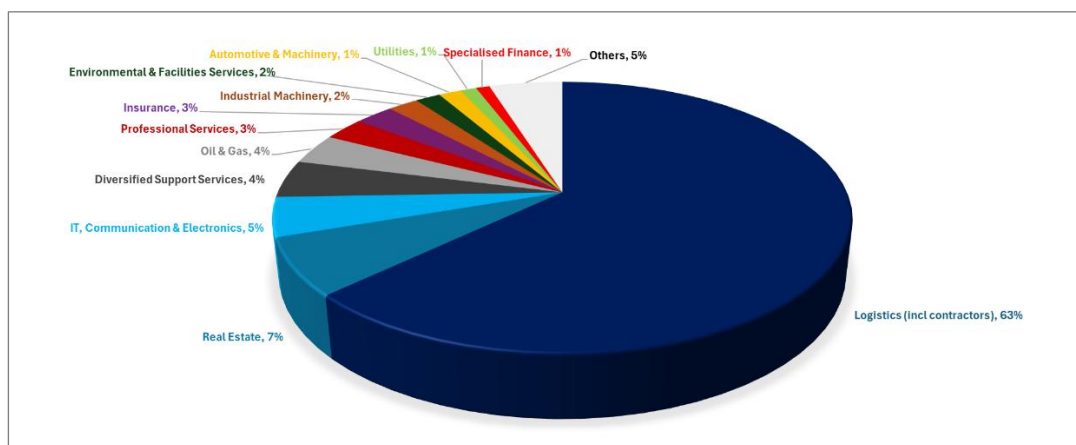
Based on our analysis of FY25 supplier data, from a geographical distribution perspective, approximately 50.8% and 47.8% of our Tier 1 suppliers and contractors are located in Australia and New Zealand respectively, reflecting our commitment to supporting local businesses, both small and large (Graph 3 below). The remaining 1.4% of our suppliers (with a spend greater than A\$5k) are located in Canada, China, Germany, India, Ireland, United Kingdom and USA.

Graph 3: Approximate proportion of suppliers by geographic location



Key supply categories (Graph 4) include logistics (including contractors) real estate, IT, communications and electronics, diversified support services, oil and gas, professional services, insurance, industrial machinery, environmental and facilities services (including cleaning and maintenance), automotive and machinery, utilities, specialised finance and other (distributors, containers and packaging, paper packaging, entertainment and security). A small proportion of our goods and services procurement relates to products purchased by some of our businesses for resale to their customers. Some of these products include archive storage boxes, media tapes, IT hardware and equipment, courier and postal satchels, waste and sharp containers, as well as fruit, milk, and other chilled products as part of our refrigerated delivery service in New Zealand.

Graph 4: Approximate FY25 procurement spend by key supplier industries



Modern slavery risks in our operations and supply chains

Operational risks

Given the inherent industry risks, we may be perceived as a business with heightened risk of modern slavery via the employment of base-skilled workers and the use of temporary or casual workers performing manual labour. While the majority of our workforce is employed on a full or part-time basis, there is a small percentage of the workforce engaged on a casual basis, who support our business in areas such as freight handling and sortation, warehouse picking and storing, waste renewal and processing, digitisation and service delivery.

Temporary labour in industries with low barriers to entry features a higher number of migrant workers and those on temporary visas that may have limited English proficiency and awareness of their rights in the workplace leading to a hesitation to speak up in relation to exploitative conditions. These factors can lead to withholding of wages, underpayment, excessive working hours, debt bondage and fraudulent contracting through third-party labour hire arrangements such as recruitment agencies.

Freightways hires most of its casual labour force directly, rather than hiring a contingent workforce through recruitment agencies. This, to an extent, mitigates some of the potential risks linked to the increased risks of forced labour and debt bondage for migrant workers in our operations. We engage third-party labour providers sparingly, allowing us to have increased oversight over our workforce and their employment terms. When we engage external providers, we ensure that:

- they hold all requisite licences (where applicable, e.g. in Victoria and Queensland); and

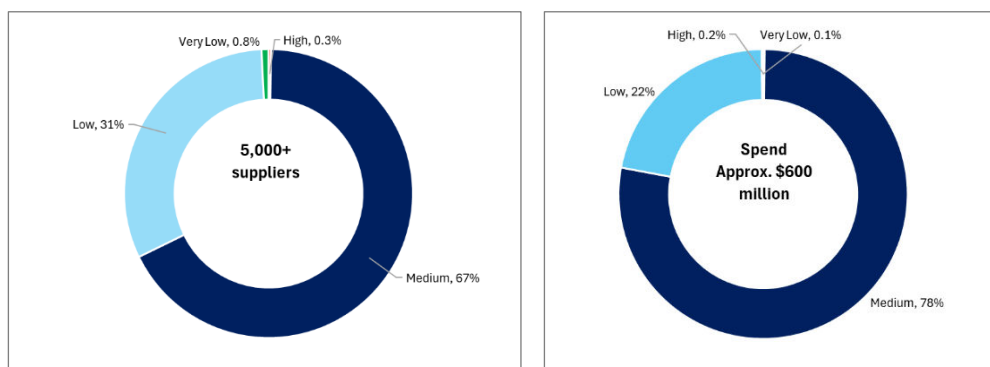
- agencies are bound by contractual terms to pay labour hire personnel in compliance with laws and on time.

Some of our businesses utilise young workers under the age of 18 to perform seasonal work and work as casuals, including in the business areas described in the first paragraph in this section. As defined by the ILO, not all work done by young workers is classified as child labour. We consider that our employment of young workers does not constitute child labour as defined under Article 3 of ILO Convention No. 182 given the work, health and safety measures in place for all workers and ensuring, where relevant, that working hours do not interfere with schooling.

Supplier risks

Utilising our procurement data and third-party modern slavery software solution, Informed 365, we have updated our supplier inherent risk assessment for FY25 as shown in Graphs 5 & 6 below. The inherent risk rating is generated by Informed 365 solution by reference to two key inputs a) supplier’s geographic location and b) supplier’s industry and leverages upon country and industry risk ratings generated by a globally recognised organisation. This is the first year that our New Zealand Businesses were included in this assessment. As shown in the table below, 99% of our suppliers have a low or medium inherent risk rating. This is largely due to their location, as most of our suppliers operate in Australia and New Zealand which have a relatively low inherent modern slavery risk. Less than 1% of suppliers received a high inherent risk rating, representing 16 suppliers out of 5,000+ suppliers.

Graph 5 & 6: FY25 Supplier Inherent Risk Assessment by No. of Suppliers and Spend



The outcomes of this annual assessment continue to be utilised to inform ongoing due diligence, specifically what suppliers and activities should be prioritised and the depth of due diligence is most appropriate.

Our supply categories with heightened inherent supply chain modern slavery risks are set out below:

Category	Overview of inherent modern slavery risks
Industrial equipment, machinery and vehicles	<p>The industrial equipment sector, particularly in the manufacture of trolleys, forklifts, pallet jacks and other logistics machinery have significant modern slavery risks due to complex, multi-tiered global supply chains and the reliance on both metallic and composite materials as key components. Modern slavery risks, including forced labour and the worst forms of child labour, are prevalent in the sourcing and processing of high risk-input materials such as steel, aluminium, and rubber.</p> <p>Manufacturing processes in this sector often rely on subcontracted suppliers in low-cost regions, where labour-intensive tasks such as metal casting, forging, and parts assembly are particularly vulnerable to exploitative labour practices. These risks are</p>

	<p>exacerbated by pressures for rapid production and cost efficiency, which exist in opaque supply chains which limit oversight particularly for lower-tier suppliers. These dynamics elevate the risk of modern slavery within supply chains for equipment essential for logistics and industrial operations.</p> <p>As reported by Sheffield Hallam University, the automotive sector, particularly in the manufacturing of cars, trucks, and transport vehicles, is exposed to significant modern slavery risks due to its complex global supply chains and reliance on high risk minerals (both in terms of extraction and processing) as key inputs. Modern slavery risks, including forced labour and the worst forms of child labour, are prevalent in the sourcing of raw earth minerals used in vehicle manufacturing, such as copper, cobalt, nickel, and 3TG minerals (tin, tantalum, tungsten, and gold). These minerals are often mined in regions characterised by civil unrest and conflict and are deemed high-risk materials by various reports, including the ILAB List published by the U.S. Government. There are also modern slavery risks associated with non-metallic raw materials used in vehicles, such as rubber, leather and plastics.</p> <p>Additionally, labour-intensive roles in vehicle parts assembly are vulnerable to modern slavery risks, particularly when outsourced to third-party contractors. Downward pressures such as short lead times and complex, opaque supply chains further reduce oversight, especially among lower-tier suppliers, increasing the potential for exploitative practices.</p> <p>Petrol and fuels used to power trucks, cars, and other vehicles carry downstream risks. In particular, oil and gas extraction projects often operate in remote regions with limited oversight of labour and health and safety standards, leaving workers vulnerable to labour and safety risks, with minimal recourse for grievances. Additionally, migrant workers frequently make up a substantial portion of the labour force in extraction and refinery projects, particularly in oil-rich but labour-importing countries. These workers are especially vulnerable to exploitation due to language barriers, limited knowledge of their rights, and minimal bargaining power. Furthermore, the sector commonly relies on labour brokers to source migrant workers, and reports indicate that workers recruited through these brokers often face high recruitment fees, which can result in debt bondage where workers are compelled to repay 'debt' under exploitative conditions.</p>
<p>IT hardware, including printing equipment</p>	<p>The electronic manufacturing industry has been linked with numerous instances of labour exploitation which present themselves deep within the complex supply chains, from the mining of the raw minerals required to make the components within these products to the manufacture of electronic products. The industry is at higher risk for forced labour and human trafficking throughout its supply chain including the use of migrant labour. Other risks associated with the industry lie in the sourcing of commodities which are associated with forced labour and exploitation, limiting the control over modern slavery risk within the electronic supply chains.</p>
<p>Construction services and materials</p>	<p>Modern slavery risks exist within the sourcing of labour and procurement of building materials and products. With high amounts of subcontracting and the possibility of using third-party labour agencies, there is limited visibility into hiring processes and working conditions. This is further exacerbated by the low-skilled nature of work, which is likely to attract migrant labour or others who may not have the knowledge, and bargaining power, to speak up and assert their rights. Companies may also unintentionally support forced labour through the procurement of building materials due to the complexity and a lack of transparency within the full supply chain.</p>
<p>Office supplies</p>	<p>Office supplies are considered higher risk for modern slavery due to low profit margins and complex and opaque supply chains. Manufacturing of office supplies is typically outsourced to manufacturing hubs, located in developing countries, where legal protections and regulatory environments are weak. As such, workers are vulnerable to labour exploitation and modern slavery</p>
<p>Labour hire</p>	<p>Labour hire agencies for unskilled or low skilled roles may apply less stringent pre-employment checks and have less awareness of modern slavery during the recruitment of workers. This increases the risk of hiring trafficked employees under conditions of debt bondage and forced labour – where victims are put to work against their will without the freedom to leave. This is especially relevant for agencies servicing sectors such as logistics, waste management and construction.</p>

Diversified support services, including cleaning and maintenance	The cleaning and maintenance sectors rely on manual labour in the context of low barriers to entry. Workers are often employed on a contingent basis with limited job security and entitlement to employment benefits such as sick leave. Additionally, they are usually contracted to third-party labour agencies which further increases the risk of modern slavery as there is a lack of transparency and accountability which limits visibility into how the workforce is managed. As a result, workers providing these services are vulnerable to labour exploitation and modern slavery.
Air freight and logistics	Insecure forms of employment, specifically jobs characterised by low wages, unstable work arrangements, temporary employment contracts, absence of employment benefits, and a lack of legal and regulatory protections, are common in the air freight & logistics sector. As a result, employees often have less rights and bargaining power and are therefore vulnerable to labour exploitation and modern slavery.

Actions taken to assess and address modern slavery risks

Governance

Freightways is committed to the highest standard of corporate governance and ethical behaviour. The Freightways Board is responsible for overseeing the management of risks, including those related to modern slavery, by ensuring adequate risk management strategies are in place and monitoring the integrity of management information and the timeliness of reporting to shareholders and other stakeholder groups. Responsibility for overseeing modern slavery risks is also assigned to the Senior Leadership Team.

Freightways' Chief Financial Officer ("CFO") takes responsibility for assessing and managing modern slavery risks at a corporate level. As part of this role, the CFO reports to the Freightways Board and is engaged in structuring Freightways' modern slavery management approach. The CFO works across the Freightways Group seeking to ensure that modern slavery considerations are integrated into relevant policies, frameworks and action plans.

Committee

The Committee is tasked with providing governance and leadership and to deliver on Freightways' modern slavery commitments. As foreshadowed in our 2024 modern slavery statement, the plan for 2025 was to bring our New Zealand Businesses in scope for our modern slavery reporting and to submit all future statements covering the Freightways Group as a whole. This work commenced during FY25 and enabled us to identify gaps and develop plans to address the gaps.

Throughout FY25, the Committee progressed the following actions that we had set for the year:

- **New Zealand Businesses** – reviewed key operational aspects of our New Zealand Businesses including examining our hiring practices, how contractors, young workers and migrant workers are managed and how different teams operate and monitor workings hours.
- **Governance** – established the Committee to include key representatives from the New Zealand businesses.
- **Policies** – rolled out the Supplier Code of Conduct to a priority group of suppliers and published the Code on most of our business websites. A link to the Code also appears on remittance notes.
- **Training** – monitored completion rates across the Freightways Group and observed that most of the New Zealand Businesses that were in scope for the first phase of modern slavery training rollout, along with the Australian Businesses in their ongoing training cycle demonstrated high completion rates.
- **Supplier due diligence** – Continued the implementation of Inform 365 solution to support our supplier due diligence efforts across the Freightways Group.

Our Commitment

Our Code of Ethics commits Freightways to mitigating modern slavery risks in our operations and supply chain.

- As an employer, Freightways is committed to providing a safe workplace where all employees are treated with respect and dignity. Freightways opposes all forms of modern slavery within its business and supply chain.
- As a purchaser of goods and services, Freightways seeks to engage suppliers that can, and do, comply with its Supplier Code of Conduct or their own comparable policies. Freightways expects its major suppliers to have in place, and implement, adequate policies, controls designed to prevent, detect, assess and manage modern slavery risks in their operations and supply chains.

Policies

We have several policies and procedures in place that give effect to our commitment to mitigating modern slavery within our operations and supply chain. The Committee, senior management and the Freightways Board have responsibilities for undertaking reviews and updates to the policies as and when required. These policies, a number of which are available on the Freightways website ([Policies](#)), include:

- Code of Ethics
- Supplier Code of Conduct
- Diversity and Inclusion Policy
- Protected Disclosure (Whistleblower) Policy (one each for New Zealand and Australia)
- Recruitment Policy (internal only)
- Risk Management Policy

Due diligence

Our Australian Businesses have continued to operationalise the third-party supplier due diligence platform throughout FY25, and progress has been made to implement the same processes for our New Zealand Businesses. Further details of our approach that applied during FY25 to due diligence across our operations and supply chains are set out below.

Risk Assessment Overview

Operations

Recognising the risks associated with a temporary workforce, we seek to ensure that our workforce is predominately hired directly by the business, rather than being employed through a third-party labour provider. This approach enables us to have oversight over the working conditions of our employees and compliance with labour standards.

To ensure compliance with industrial relations requirements, our P&C team and management across most Australian and New Zealand Businesses:

- Perform thorough pre-employment checks during the recruitment process to make sure applicants have the right to work and are of the appropriate age. For all foreign labour, we perform visa checks to confirm applicants meet their visa requirements and have been granted the right to work in the country in which they seek to work. The same recruitment process (including pre-employment checks) applies regardless of whether the applicant is applying for a full-time, part-time or casual position. Third-party labour providers are also required to perform preemployment checks for labour provided to our Businesses prior to commencement.
- If undertaking an acquisition, Freightways performs due diligence activities around employment (amongst other areas) prior to purchase including (where applicable) review of visas and minimum award checks, to ensure the acquisition target meets our requirements.
- Assess the English proficiency of new recruits and if required provide support to ensure all employment rights and conditions are clearly understood.
- Deploy various systems and processes to monitor employee working hours. Our site managers are responsible for reconciling and approving employee working hours to ensure the business aligns with the industry award and monitoring instances of excessive hours. Audit trail reports from payroll systems and timesheet summaries are also regularly reviewed by our Finance teams, in combination with the use of technology such as digital scanners (where available) to help monitor and track employee working hours.
- Utilise an integrated HR system which enables them to closely monitor potential risks around application of correct award levels and pay rates.

To manage risks associated with our migrant workforce, we monitor visa compliance on an ongoing basis to ensure our employees comply with their visa conditions. If an employee's visa is due to expire, updated visa checks are performed and in the event that an employee loses their right to work, the P&C team and management will work with the employee to remediate the issue.

A third-party training programme is utilised across the Freightways Group to upskill and increase employee awareness of modern slavery. For select Australian Businesses, the modern slavery training is mandatory for new employees, while existing employees who have completed the training previously are required complete refresher course either annually or every two years.

In FY25, modern slavery training continued to be provided to staff at levels (senior and middle management teams and operational staff) across the Australian businesses and was rolled out for key senior management roles and other key personnel involved in procurement activities in our New Zealand Businesses.

Supply chains

Regular engagement with our suppliers and contractors is an important part of our approach to maintaining strong relationships. The strength of these relationships forms a pivotal aspect in our broader efforts to prevent and mitigate the risks of modern slavery in our supply chains. Ongoing performance management processes are implemented to ensure that supplier and contractor performance is measured and analysed throughout the contract period.

During FY24, a new software solution, Informed 365, was deployed to assist with supplier due diligence. The implementation of Informed 365 continued during FY25. Using the Informed 365 solution, we were able to consider the first tier of our supply chain, assessing over 5,000 suppliers across more than 16 countries to identify those that might carry a higher risk based on their location and the industries in which they operate.

Grievance Mechanisms and Remediation

A trusted and accessible grievance mechanism is vital for people who may be impacted by modern slavery in our operations or supply chain. Freightways has a Protected Disclosure (Whistleblower) Policy that applies across the Freightways Group. All employees and contractors can raise modern slavery-related grievances directly with managers, but also via the protected disclosures email (makingadisclosure@freightways.co.nz), via the EAP Whistleblower hotline (on 0800 327 669 from New Zealand or 1800 726 474 from Australia) or to other specified senior management personnel as set out in the Policy. The Policy sets out the Freightways' internal procedures for how a protected disclosure can be made and how the disclosure will be investigated. Where adverse human rights impacts are identified (either directly or indirectly) in operations or supply chains, we recognise the need to engage with the impacted individual(s) in accordance with the principles on remedy as set out in the United Nations Guiding Principles on Business and Human Rights.

Evaluating Effectiveness

We recognise the value of understanding how effective our actions are in addressing modern slavery risks. The key initiatives undertaken in FY25, and a description of how they help us to measure our effectiveness, are provided below.

Key initiatives undertaken in FY25	How this helps us to measure our effectiveness
Assessed New Zealand Businesses	Improved visibility of the potential risks of modern slavery in our operations in New Zealand and enabled us to implement measures to work with the New Zealand Businesses to mitigate risks.
Established the broader Committee for both Australian and New Zealand businesses	Set the foundations for the alignment of our efforts across the Freightways Group.
Rolled out the Supplier Code of Conduct	Increased awareness of the Supplier Code of Conduct with a priority group of suppliers so that they understand our expectations and requirements in relation to responsible business conduct. Increased accessibility of the Code by publishing it on a number of our business websites and including a link on remittance notes.
Rolled out Modern Slavery training to New Zealand Businesses	Increased engagement and awareness of modern slavery red flags within our New Zealand workforce by achieving a high completion rate.
Continued supplier due diligence	Increased visibility of the risk profiles of our first-tier suppliers by incorporating supplier data and spend from New Zealand Businesses for the first time, along with latest data from Australian businesses, to inform further supplier engagement and any further due diligence where required.

The Way Forward

We seek continuous improvement in our approach to assessing and addressing the risks of modern slavery in our operations and supply chains. As part of our ongoing efforts, we have outlined a number of proposed actions to be undertaken during FY26 as set out below. We will review our progress of the proposed actions, provide periodic updates to the Board and reflect on the effectiveness of our proposed actions in our FY26 modern slavery statement.

Focus Area	Proposed Actions for FY26
Governance	<ul style="list-style-type: none"> • Develop and adopt a charter for the Committee to clarify its role and responsibilities. • Educate contractor drivers on modern slavery risks and responsibilities and develop and roll out a contractor personnel engagement policy.
Risk Assessment	<ul style="list-style-type: none"> • Develop guidance material to support procurement personnel in navigating supplier negotiations in relation to modern slavery compliance, inclusion of modern slavery clauses in contracts and how to conduct risk assessments. • Increase inclusion of the Supplier Code of Conduct in supplier sourcing/tender documentation and in new supplier onboarding processes and procedures. • Increase response rates on supplier questionnaires through greater engagement with the suppliers that received a high-risk rating via the platform and conduct further due diligence if required.
Grievance and Remediation	<ul style="list-style-type: none"> • Develop communication material to increase awareness amongst staff and contractor drivers of Freightways' hotline and how to identify red flags for modern slavery risks. • Develop remediation guidance aligned with the UN Guiding Principles on Business and Human Rights to support individuals in managing the response to actual or suspected instances of modern slavery.
Training	<ul style="list-style-type: none"> • Continue the rollout of modern slavery training to relevant personnel in the New Zealand Businesses that were not included as part of the first phase of rollout in FY25.

Appendix 2: Australian *Modern Slavery Act 2018* Index

Freightways Group prepared its 2023 Modern Slavery Statement in accordance with the mandatory criteria listed in s16(1) of the Australian *Modern Slavery Act 2018*. The table below lists the criteria and the sections in our Statement that address each.

Reference	Australian Modern Slavery Act 2018 (Cth) mandatory reporting requirement	Location of information
s 16(1)(a)	Identify the reporting entity.	Page 2-3 – About this Statement
s 16(1)(b)	Describe the structure, operations, and supply chains of the reporting entity.	Page 2-3 – About this Statement Page 5-11 – Our Business
s 16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Page 11-14 – Modern slavery risks in our operations and supply chains
s 16(1)(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Page 14-17 – Our approach to modern slavery risk management
s 16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions.	Page 17 – Evaluating Effectiveness
s 16(1)(f)	Describe the process of consultation with: i) any entities that the reporting entity owns or controls; and ii) in the case of a reporting entity covered by a Statement under section 14 – the entity giving the Statement.	Page 2-3 – About this Statement Page 14 – Committee
s 16(1)(g)	Include any other information that the reporting entity, or the entity giving the Statement, considers relevant.	Page 18 – The Way Forward