

Freightways Modern Slavery Statement

1 July 2023 – 30 June 2024

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.



- 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 9 of the 2024 [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;
 - Datasafe Pty Ltd; and
 - Allied Express Transport 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.

This statement describes our Australian businesses in response to the mandatory criteria under section 16 of the *Modern Slavery Act 2018* (Cth) (“**Criteria**”). Despite the proposed modern slavery legislation stalling in New Zealand, it is our intention to commence rolling out our modern slavery program across the New Zealand businesses over the next twelve months, which will enable us to address the Criteria in respect of our New Zealand businesses in our next modern slavery statement.

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. Datasafe Pty Ltd is a reporting entity as it held over \$100 million in consolidated revenue for the entities it owns. Likewise, Allied Express Transport Pty Ltd is a reporting entity in its own right by virtue of the consolidated revenue of its owned entities.

In preparing this Statement, Freightways consulted with its Modern Slavery Working Group (“**MS Working Group**”), which includes key personnel from the Australian Businesses across four departments, namely People & Culture (“**P&C**”), Procurement, Compliance and Finance. Through the MS Working Group, Freightways engages with the Australian Businesses in the development of this Statement.

References in this Statement to “**we**”, “**us**”, “**our**” and any derivatives are references to the Australian Businesses unless the context requires otherwise.

This Statement, covering the 12 months ended 30 June 2024 (FY24), was approved by the Board of Directors of Freightways (“**the Board**”), the parent entity, on 28 November 2024.



CEO – Mark Trougher
Date: 28 November 2024



Chairman – Mark Cairns
Date: 28 November 2024

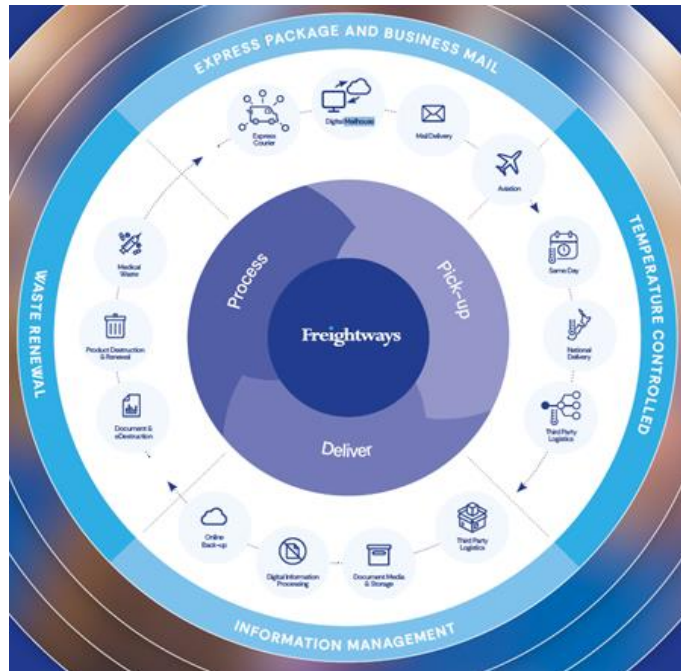
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We² recognise that, through our operations, supply chains and business relationships, we have the potential to cause, contribute, or be directly linked to modern slavery. We are committed to respecting and upholding the fundamental rights of our employees, contractors and individuals employed or engaged by our suppliers and seek to combat modern slavery within our business and supply chains through the measures outlined in this Statement.

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. It is a history that has honed our business skills and appetite for innovation in lateral ways, helping us to build our presence in emerging sectors where our core strengths enable us to compete meaningfully and profitably.



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

Freightways has achieved growth through both organic and acquisition opportunities. 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. Freightways has demonstrated the ability to acquire and execute in areas that complement these capabilities to broaden our business.

In FY24, we expanded our New Zealand business by acquiring First Global (subsequently rebranded as Freightways Global), which specialises in international cross-border logistics. This transaction builds scale and ability to grow our Express Package eCommerce segment and provide customers a one-stop shop for all sorts of international freight to and from New Zealand.

² “We”, “us”, “our” and “ours” is a reference to the Freightways Group on this page.

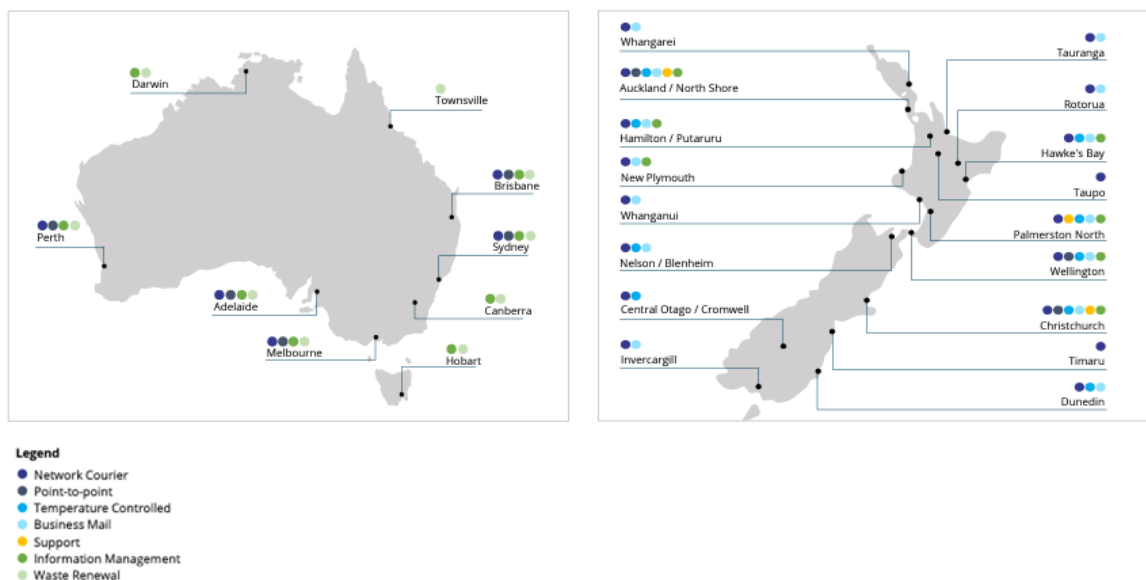
Structure

In FY24, the Freightways Group operated brands across the following service lines:

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

The brands are all supported by a number of internal service provision companies in respect of Information Technology ('IT'), linehaul, property, treasury and corporate services. 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: Trans-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 trading businesses operate within the express package, information management and waste renewal segment and are responsible for providing a range of services, including express transport and distribution solutions, document and digital archiving, physical to digital data conversion, escrow services, print and copy services, secure collection and destruction of documents, e-waste and medical waste, as described in further detail below:

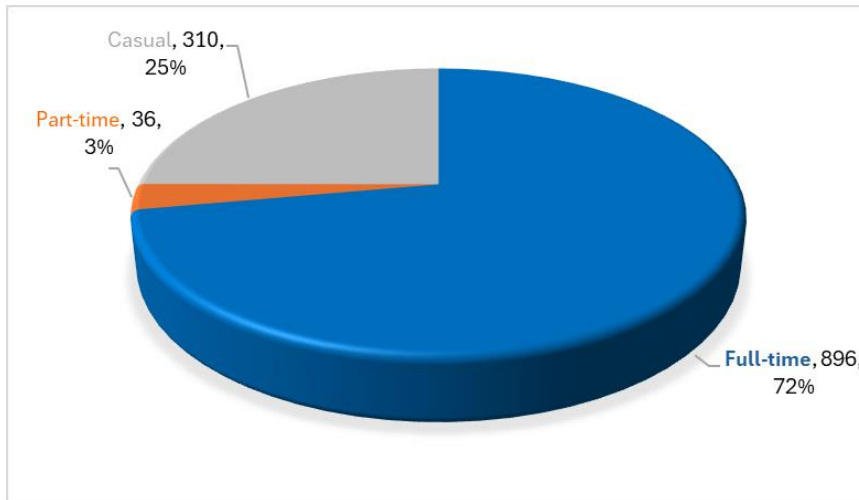
Australian Business	Location of operations	Description of operations
Allied Express	National business operating in all states of Australia other than Tasmania	Provides a broad range of express transport and distribution solutions, from courier and taxi trucks, to intra and interstate road and air services, as well as third party logistics. Allied Express partners with an agency network of approx. 50 different partners along with key line haulers and airlines to achieve its national reach. www.alliedexpress.com.au
TIMG (incl. BackOnline and Databank Escrow)	National business operating in all states and territories of Australia.	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		Sits within TIMG and helps law firms, corporations and government agencies within Australia find, process and present information.
Shred-X	National business operating in all states and territories of Australia.	Offers a Privacy Act compliant service for the collection, transportation and destruction of sensitive data with the most extensive direct service coverage in the industry. The Shred-X service includes document destruction, e-waste and IT asset lifecycle solutions, media and hard drive destruction, archive box and purge destruction, textile and product destruction. www.shred-x.com.au
Med-X	Victoria, New South Wales and Queensland	Sits within Shred-X and provides 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. www.med-xsolutions.com.au

For further details on Freightways operations, refer to the websites noted in the table above and the [Annual Report](#).

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 2024, we employed 1,242 people across the Australian Businesses (Graph 1). The majority of our employees are employed on a full-time basis.

Graph 1: Number of Employee by Category and Percentage of Workforce



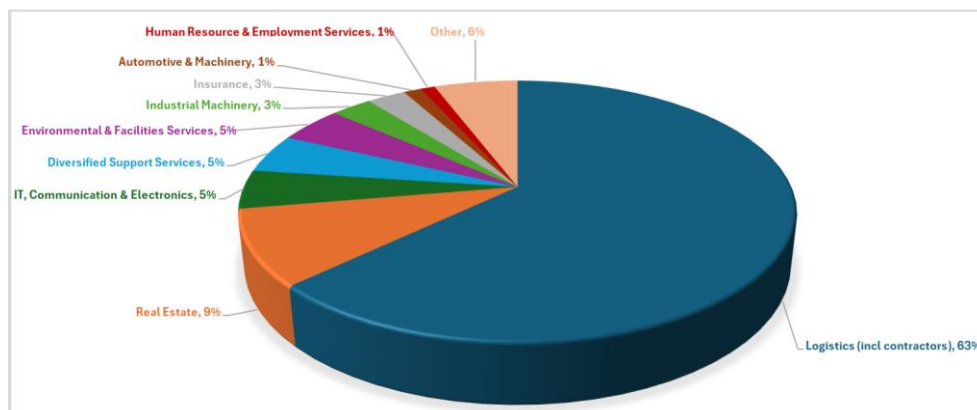
Employees perform roles in a diverse range of functions within the Australian Businesses including: accounting, administration, and office support, compliance and governance, general management, customer service, human resources, information and communication technology, digitisation, logistics, processing and warehousing and sales.

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 2). 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.

In FY24, our total supplier spend (including contractors) in Australia was AU\$244 million, spread across 3,000+ suppliers. For the Australian Businesses, 97% of direct (or tier 1) suppliers and contractors are located in Australia, reflecting our commitment to supporting local businesses, both small and large. The remaining 3% of suppliers (with annual spends greater than A\$5k) are located in China, Germany, India, Ireland, Israel, New Zealand, South Africa and USA.

Graph 2: Freightways’ Procurement of Goods and Services in FY24 – Spend by Key Industries



Key supply categories include logistics (including contractors), real estate, IT, communications and electronics, diversified support services, environmental and facilities services (including cleaning and maintenance), industrial machinery, insurance, automotive and machinery, human resources and employment services and other (including fuel, professional services, packaging, utilities, construction, office suppliers, protective personal equipment (PPE), food and beverage, travel and accommodation).

Modern Slavery Commitment

Our³ revised Code of Ethics commits Freightways to mitigating modern slavery risks in its operations and supply chain. All businesses, including Freightways, have a role to play in fostering ethical business practices that help to prevent modern slavery.

- 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 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.

Our people have an important role to play as Freightways' first line of defence, particularly when making procurement decisions on behalf of Freightways and maintaining awareness and vigilance of the red flags for modern slavery within Freightways' business and in its supply chain. Our people in relevant roles must attend such modern slavery training when required to do so by Freightways from time to time and comply with Freightways' procurement policies and procedures as updated from time to time.

Modern slavery risks in our operations and supply chains

Operational risks

Given the inherent industry risks, our operations may be considered to be a business with heightened risk of being linked to modern slavery via the employment of base-skilled workers and in our utilisation of a temporary or casual workforce. While the majority of our workforce is employed on a full or part-time basis, there is a percentage of the workforce engaged on a casual basis, who support our business in areas such as freight handling and sortation, waste renewal and processing, digitisation and service delivery.

Temporary labour in industries with a low barrier to entry typically attracts 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

³ "Our" is a reference to the Freightways Group within the Modern Slavery Commitment section.

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.

Supply chain risks

Utilising our latest procurement data and new modern slavery software solution, we have updated our supplier inherent risk assessment for FY24. Key findings from the assessment (Table 1) included:

- 99% of our suppliers have a low or medium inherent risk rating. This is largely due to their location, as most of our suppliers are in Australia which has a relatively low inherent modern slavery risk.
- Less than 1% of suppliers had a high inherent risk rating, representing 16 individual suppliers out of 3,000+ suppliers. The higher risk rating for these suppliers was driven by their industries, with the majority operating in the Technology Hardware and Service and Health Care Supplies sector.

Table 1: Freightways' Supplier Risk Assessment Results in FY24

Risk Threshold	Number of suppliers (incl. contactors)	Percentage of suppliers (incl. contractors)	Total spend (AUD)	% of total spend
High	16	0.4%	\$0.9m	0.3%
Medium	2,050	56.3%	\$177.2 million	72.7%
Low	1,561	42.8%	\$65.5 million	26.9%
Very-low	17	0.5%	\$0.2 million	0.1%

Same as last year, the majority of Freightways' suppliers continue to sit within the low and medium risk category and very few suppliers within the highest risk category. 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 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, faces 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 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 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>

Category	Overview of modern slavery risks
	<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 natural rubber for tyre production.</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>
IT hardware	<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>
Construction services and materials	<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>
Office supplies	<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>

Category	Overview of modern slavery risks
PPE and Health Care Supplies (HCS)	The manufacturing of PPE and HCS has been identified as higher risk of modern slavery due to low profit margins and complex supply chains. A number of recent investigations, stemming from COVID-19, have exposed instances of modern slavery in the supply chains of the world's largest distributors of PPE and HCS. Manufacturing of these supplies typically takes place in countries with lower legal and regulatory workplace protections. Accordingly, workers in these manufacturing facilities are at risk of labour exploitation and modern slavery.
Labour hire	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.
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

Our approach to modern slavery risk management continues to be driven by our MS Working Group and consists of the actions and processes across the following categories:

Governance

Freightways is committed to the highest standard of corporate governance and ethical behaviour. The Freightways Board are responsible for overseeing the management of risks, including those related to modern slavery. The Freightways Board ensures adequate risk management strategies are in place and monitors 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 each Australian business unit to ensure modern slavery considerations are integrated into policies, frameworks and action plans.

MS Working Group

Freightways' MS Working Group operates across all Australian businesses and is made up of representatives from the Senior Leadership Team. The MS Working Group members include 2-3 representatives from the Australian Businesses. The MS Working Group, with support from the CFO, is tasked with providing governance and leadership and to deliver on Freightways' modern slavery commitments.

Throughout FY24, the MS Working Group progressed the following actions that we had set for FY24:

- **Policies** – Incorporated modern slavery commitments in our Code of Ethics and developed a Supplier Code of Conduct.
- **Training** – Continued to provide training to staff at all levels (senior management, middle management and operational staff) across the Australian businesses, including recently acquired businesses.
- **Supplier due diligence** – Implemented a new software solution to streamline our supplier due diligence process, which also provides greater visibility, transparency, and reporting capabilities on our supply chain across our Australian businesses.

Policies

We have several policies and procedures in place that give effect to our commitment to combatting modern slavery within our operations and supply chain. The Working Group, senior management and the Freightways Board have responsibilities for driving regular reviews and updates to the policies. These policies, a number of which are available on the Freightways website, include:

- Code of Ethics
- Supplier Code of Conduct
- Protected Disclosures (Whistleblower) Policy
- Recruitment Policy
- Risk Management Policy

Due diligence

While existing operational and supply chain due diligence processes have not been specifically deployed to manage modern slavery risks, they do provide for us a strong foundation upon which we can build our approach. Our Australian Businesses have continued to assess its due diligence approach throughout FY24 and ways to improve the processes. Once the supplier due diligence platform becomes fully operational, it will be rolled out across the Freightways Group.

Risk Assessment & Mitigation Measures

Operations

Recognising the risks associated with a temporary workforce, we ensure that the majority of our workforce is directly hired by the business, rather than being employed through a third-party labour provider. This approach ensures that we have sufficient oversight to monitor and manage the working conditions of our employees and ensure all relevant labour standards are met.

To ensure compliance with the industrial relations requirements, our P&C team and management:

- 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. Labour sourced from third-party labour providers, regardless of employment type, also undergo pre-employment checks 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. Following acquisition and leveraging this due diligence process, Freightways reviews and updates existing employment contracts as required so that they align with the minimum award and other legislative requirements.
- Continue to assess the English proficiency of all new recruits and, if required, engage a translator to facilitate and assist with the translation of employment contracts and other relevant employee documentation, such as the Employee Handbook and Code of Ethics, to ensure all employment rights and conditions are clearly understood. Employees are offered and provided literacy skills and training if necessary.
- Deploys 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 is aligning with the industry award and no employee is working 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 regularly monitor visa compliance to ensure our employees are abiding by 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 employee to remediate the issue.

A mix of specific third-party and internal training programmes are utilised across the Australian businesses to upskill and increase employee awareness of modern slavery in our supply chains. This modern slavery training is mandatory for employees in roles that have regular touchpoints with potential human rights risks throughout our supply chains, for example, procurement and recruitment functions.

In FY24, modern slavery training continued to be provided to staff at levels (senior and middle management teams and operational staff) across the Australian businesses.

Supply chain

Our Australian Businesses seek to regularly engage with our suppliers and contractors to maintain strong relationships. These relationships are pivotal to preventing and mitigating risks in our supply chains. Ongoing performance management processes are implemented throughout the Australian Businesses to ensure that supplier and contractor performance is measured and analysed throughout the contract period.

In previous years, our approach to due diligence relied upon supplier self-assessment (SSA) questionnaires aimed at assessing supplier policies and practices to identify, assess and mitigate modern slavery risks in their supply chains and operations. Responses to the questionnaires were considered to determine a residual risk rating for suppliers. Following this, any suppliers with a medium-high or high residual risk were the subject of further review. No SSA questionnaires were sent out to high-risk suppliers in FY24 given the poor response rate from prior year and instead, a desktop due diligence process was undertaken on a limited number of inherent high-risk suppliers using publicly available information to assess their modern slavery risk where possible.

During FY24, a new software solution was deployed to assist with supplier due diligence. The implementation of this new software platform is expected to enable us to enhance our due diligence process in FY25 to cover more tier 1 suppliers, particularly those operating in high-risk industries identified above, as well as help improve our response rate on the SSA questionnaires. It is anticipated that the new platform will provide greater visibility, transparency, and reporting capabilities on our supply chain across our Australian Businesses.

Grievance Mechanisms and Remediation

We recognise the importance of providing a trusted and accessible grievance mechanism for people who may be impacted by modern slavery in our operations or supply chain. Freightways has a Protected Disclosure (Whistleblower) Policy that applies to all subsidiary entities within the Group. All employees and contractors are able to raise modern slavery-related grievances directly with managers, but also via the protected disclosures email address, via the EAP Whistleblower hotline 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 impacts in operations or supply chains are identified (either directly or indirectly), we recognise the need to engage with affected stakeholders to remediate any harm caused.

No modern slavery related complaints were received via the hotline or any other channels during FY24. Freightways recognises that the absence of reports does not necessarily equate to the absence of risk.

In FY25, we will continue to provide training to staff to increase their ability to identify instances of modern slavery and inform them of how to respond to these using our grievance mechanism. This ensures that staff, contractors and suppliers understand what can be raised through the hotline.

Evaluating Effectiveness

We recognise the value of understanding how effective our actions are in addressing modern slavery risks. The key initiatives undertaken in FY24, and a description of how they help us to measure our effectiveness, are provided below.

Key initiatives undertaken in FY24	How this helps us to measure our effectiveness
Incorporated modern slavery commitments in the Freightways Code of Ethics.	Formalises our Group wide commitment to mitigate modern slavery and increases staff awareness of modern slavery as part of the Code of Ethics training that is required as part of induction and periodically thereafter.
Developed a Freightways Supplier Code of Conduct which sets out our expectations regarding labour rights, human rights and ethical sourcing.	Communicates our expectations of suppliers to adopt adequate measures to mitigate modern slavery risks in their own operations and supply chains.
Implemented new modern slavery software platform to support our supplier due diligence efforts.	Enhances our ability to assess modern slavery risks in our supply chain and streamlines our due diligence process using automation.
Rolled out modern slavery training to recently acquired businesses, focusing on senior management.	Increases the internal awareness of modern slavery risks to mitigate the risks across the acquired businesses.
Developed business integrity clauses for inclusion in supplier contracts covering modern slavery risk mitigation requirements and a guidance sheet to support personnel in utilising the clauses.	Cascades responsibility to mitigate modern slavery risks within our supply chain.

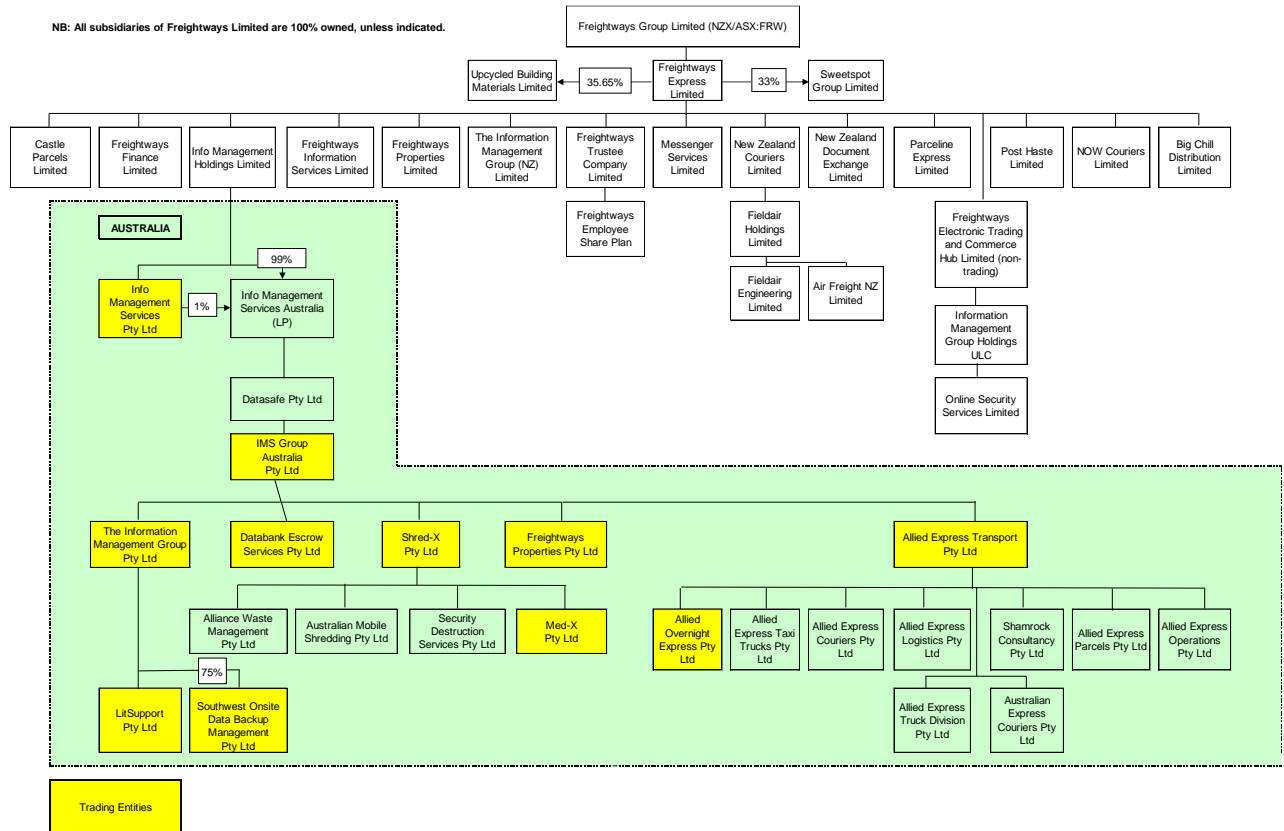
The Way Forward

We recognise that we are on a journey, and we aspire to improve and advance our approach to modern slavery risk management. Our current and future approach is described below.

Focus Area	Actions for FY25	Longer term goals
Governance	<ul style="list-style-type: none"> • Invite key representatives from the New Zealand Businesses in the MS Working Group with a view to embedding modern slavery mitigation measures across Freightways. • Develop and establish a charter for the MS Working Group. 	<ul style="list-style-type: none"> • Develop a modern slavery roadmap to mature Freightways approach to risk mitigation and response.
Risk Assessment & Mitigation	<ul style="list-style-type: none"> • Roll out the Supplier Code of Conduct and increase awareness of it across the supplier network. • Deploy the software solution to support Freightways' supplier due diligence efforts. • Include Supplier Code of Conduct in supplier sourcing/tender documentation and in new supplier onboarding processes and procedures. • Include modern slavery clauses in new supplier contracts and progressively update existing supplier contracts as they come up for renewal. 	<ul style="list-style-type: none"> • Embed the software solution across the Freightways Group procurement activities. • Conduct an assurance process to determine internal compliance with risk assessment processes and external compliance with the Supplier Code of Conduct and modern slavery contract clauses. • Increase visibility of modern slavery risks beyond the first tier of our supply chain.
Grievance and Remediation	<ul style="list-style-type: none"> • Assess the effectiveness of the grievance mechanism by reference to the United Nations Guidance on Business and Human Rights. 	<ul style="list-style-type: none"> • Improve the accessibility of our grievance mechanism to supply chain participants. • Develop a remediation guidance to support individuals in managing the response to actual or suspected instances of modern slavery.
Training	<ul style="list-style-type: none"> • Develop refresher courses and sessions relating to modern slavery 	<ul style="list-style-type: none"> • Conduct targeted training sessions for individuals with a procurement function.

Appendices

Appendix 1: Freightways Group Structure



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 – About this Statement Page 6-7 – Australian Operations
s 16(1)(b)	Describe the structure, operations, and supply chains of the reporting entity	Page 2 – About this Statement Page 5-9 – Our Business and structure, Australian Operations, Workforce & Supply Chain
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 9-12 – 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 12-15 – Actions taken to assess and address modern slavery risk
s 16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	Page 16 – 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 3 – About this Statement Page 13 – Modern Slavery Working Group
s 16(1)(g)	Include any other information that the reporting entity, or the entity giving the Statement, considers relevant	Page 9 – Modern Slavery Commitment Page 17 – The Way Forward Page 18 – Appendix 1: Freightways Group Structure