

Modern Slavery Policy

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Prepared by

Linfox Australia Pty Ltd (ACN 004 718 647)

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1.0	22 April 2020	Linfox General Counsel	New document
2.0	13 August 2021	Linfox General Counsel	Annual review and feedback from the Australian Border Force
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1 Purpose

Under the Modern Slavery Act 2018 (Cth) (the Act), ‘modern slavery’ incorporates conduct that would constitute an offence under the human trafficking, slavery and slavery-like offence provisions set out in Divisions 270 and 271 of the Criminal Code Act 1995 (Cth). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Linfox Australia Pty Ltd ACN 004 718 647 (Linfox) and its related bodies corporate¹ to:

- ensure the company is compliant with Australian and international laws and regulations in the areas in which the company operates;
- demonstrate our commitment to addressing modern slavery in all its forms; and
- promote awareness of concerns surrounding modern slavery to our employees and suppliers

2 Scope and application

This policy applies to all directors, officers, employees and suppliers of Linfox.

The company has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

3 Policy

3.1 Policy statement

Linfox is committed to limiting the risk of modern slavery occurring within our own business, infiltrating our supply chains or through any other business relationship. Thus:

- We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery-like practices, human trafficking and child labour.
- We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity.
- We integrate human rights considerations, including modern slavery, into our risk management processes.

The company’s recruitment, diversity and remuneration and reward policies and procedures support our efforts to combat modern slavery.

¹ For the purposes of this policy, Linfox’s ‘related bodies corporate’ include BevChain Pty Ltd and Linfox Asset Management Pty Ltd (to the extent Linfox Asset Management Pty Ltd is acting on the instructions of Linfox) but do not include Linfox Armaguard Pty Ltd or Linfox International Group Pty Ltd.

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3.2 Our approach

While recognising our statutory obligation under the Act to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. We aim to implement the following measures, noting that over time we will find opportunities to strengthen measures to combat modern slavery:

- developing a risk-based approach focusing our efforts on select parts of our business and select suppliers;
- engaging with our suppliers to convey to them our Modern Slavery Policy;
- undertaking supplier pre-screening as part of our tender processes;
- including contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to request information regarding their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion; and
- developing a process to assess improvements in combatting modern slavery in our supply chain.

3.3 Modern slavery statement

Linfox is subject to the requirements of the Act as a reporting entity. Section 16 of the Act requires the company to submit an annual Modern Slavery Statement to identify and address the following mandatory criteria:

- The company’s structure, operations and supply chains;
- Modern slavery risks in the reporting company’s operations and supply chains (including those of subsidiary entities);
- Actions taken (including by subsidiary entities) to assess and address those modern slavery risks, including due diligence and remediation processes;
- How the company assesses the effectiveness of actions taken; and
- The process of consultation with subsidiary entities in preparing the modern slavery statement.

The Chair will sign Modern Slavery Statements as the ‘responsible member’ for the purposes of the Act.

This policy will be used to inform our Modern Slavery Statement which will be provided to the relevant Australian Government Minister for publication annually.

3.4 Communication and awareness

Our zero-tolerance approach to modern slavery must be communicated to all employees, suppliers and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Linfox provides more specific training to those employees through whom the steps taken by the company in compliance with this policy are most likely to be taken. The aim of the training is to ensure a high level of understanding of the nature of modern slavery and the

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influence the company can bring to ensure that it does not occur within any part of its own business and in any of its supply chains.

The company expects its suppliers and other business partners to provide similar training to their employees.

4 Reporting breaches of this policy

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with the company's disciplinary procedure. Serious breaches may be regarded as gross misconduct.

All employees, directors and officers of the company will be expected to cooperate fully in any investigation into suspected breaches of this policy or any related processes or procedures.

If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period. We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

If any part of this policy is unclear, clarification should be sought from the Linfox General Counsel.

4.1 Reporting

The Linfox General Counsel will provide regular reporting to the Board on:

- any breaches of this policy; and
- modern slavery risk and what the company is doing to address those risks identified on the risk register.

5 Responsibilities of this policy

5.1 Policy Management

The Board of Directors has overall responsibility for this policy and in ensuring that the company complies with all its legal and ethical obligations.

Approval of the Policy is vested with the Board.

Reviews of the Policy are the responsibility of the Linfox General Counsel and will be conducted every two years. This is to ensure that the policy remains consistent with all relevant legislative requirements as well as the changing nature of the company.

5.2 Policy Implementation

The Chief Executive Officer (CEO) will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it

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can operate effectively.

Managers at all levels are responsible for ensuring those reporting to them:

- understand and comply with this policy; and
- are given adequate and regular training on it and the issue of modern slavery.

All employees are responsible for following the policy to the extent that it affects their day-to-day work and in respect of the reporting requirements. Employees are expected to raise concerns with their manager or Human Resources. Please also refer to our Whistleblower Protection Policy about any suspicion that modern slavery might be occurring in any part of the company's business or in any of the company's supply chains at the earliest possible opportunity.

6 Definition

This table defines the terms used throughout this policy.

Term	Definition
Child labour	While not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development. <i>Example: A child may be forced into hazardous work such as loading heavy cargoes under pressure to find money for their survival and that of their family.</i>
Debt bondage	Occurs when the victim pledges their services or the services of a third person as security for a real or purported debt where this debt is: <ul style="list-style-type: none"> • manifestly excessive; or • the reasonable value of their services is applied to the debt; or the length and nature of their services are not limited or defined. <i>Example: To secure employment, workers are charged high fees by a third-party labour hire company that the workers are ultimately unable to repay, leaving them in a situation of debt bondage.</i>
Employee	Linfox employs persons in a variety of capacities and therefore the term 'employee' is to be given a broad definition. Employees can include a director, officer, employee, contractor or agent of the company.
Forced labour	All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. <i>Example: The practice of passport retention or loss of working visas is a serious problem that may increase migrant workers' vulnerability to abuse, by leaving workers undocumented, reducing their freedom of movement and preventing them from leaving an employment relationship.</i>
Human trafficking	Means the recruitment, transportation, transfer, harbouring or receipt of persons by means of threat or use of force or other forms of coercion for the purposes of exploitation, which includes (but is not exhaustive):

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	<ul style="list-style-type: none"> • Forced labour • Prostitution • Other sexual exploitation • Slavery (or similar) • Servitude etc. • Removal of organs. <p><i>Example: People can be trafficked to Australia for labour exploitation in a range of different industries including agriculture, hospitality and construction, or for domestic servitude in private homes.</i></p>
Modern Slavery Statement	Statement to be given annually to the relevant Australian Government Minister describing the risks of modern slavery in the operations and supply chains of reporting entities and entities owned or controlled by those entities.
Reporting entity	The <i>Modern Slavery Act 2018</i> (Cth) reporting requirements apply to commercial and not-for-profit entities with annual consolidated revenue of at least AU\$100 million.

7 Procedure

We have formal policies and procedures already in place that are intended to operationalise this policy and promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business including our Code of Conduct, Whistleblower Protection Policy and anonymous Whistleblower Hotline.

8 References

Legislation

- Modern Slavery Act 2018 (Cth)
- Criminal Code Act 1995 (Cth)
- Crimes Act 1914 (Cth)
- Fair Work Act 2009 (Cth)
- Migration Act 1958 (Cth)
- Modern Slavery Act 2018 (NSW)

Policies

- The Linfox Way (Code of Conduct)
- Fraud and Corruption Control Policy
- Whistleblower Protection Policy

Other documentation

- Terms and Conditions for the Provision of Services
- Goods and Materials Terms and Conditions
- Subcontractor Agreement
- Agency Labour Agreement

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