

# MONDIALE VGL



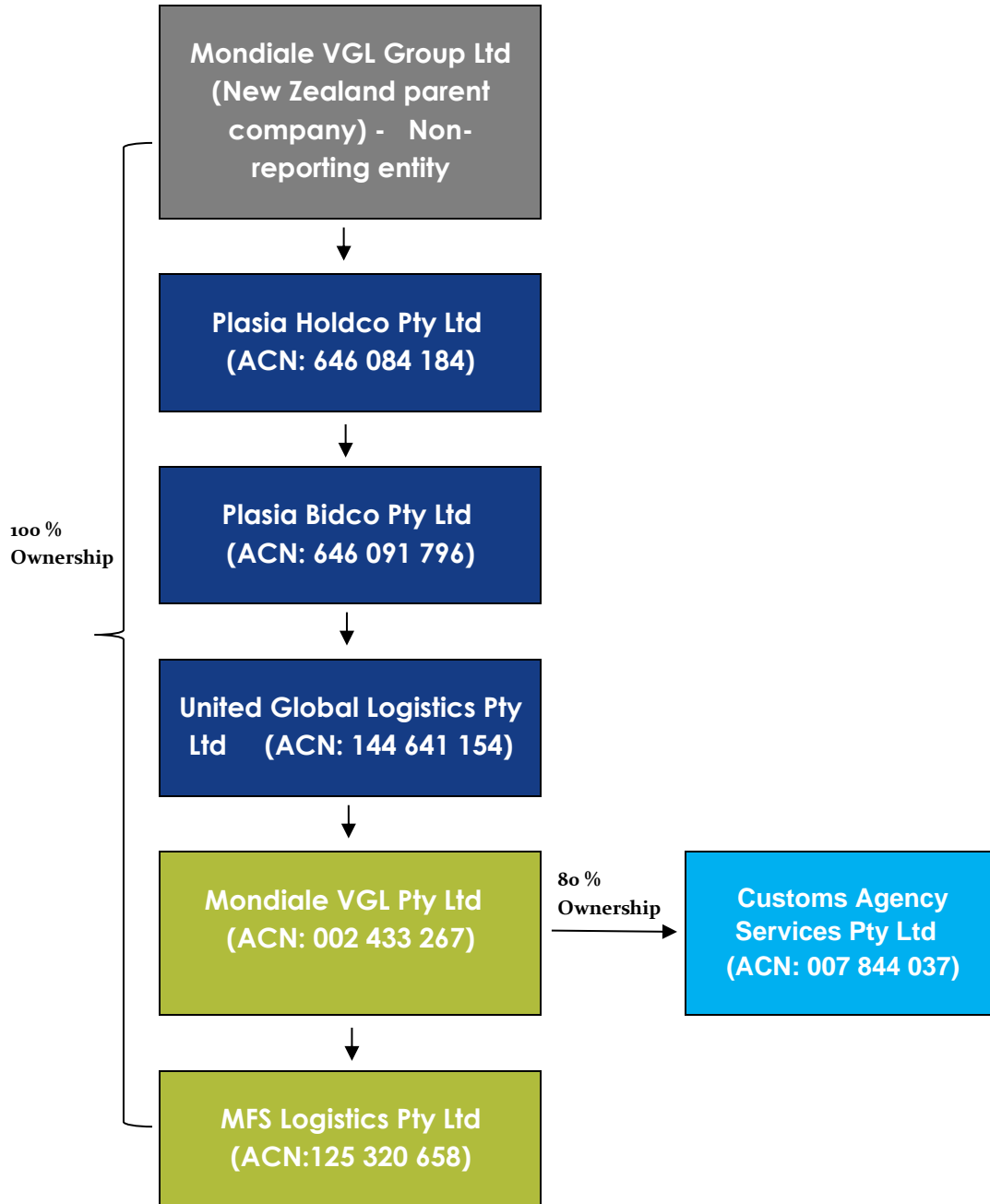
## MODERN SLAVERY STATEMENT 2022

**Mondiale VGL Group Ltd**  
**Parent entity for trading companies**  
**Mondiale VGL Pty Ltd and MFS Logistics Pty Ltd**

## Modern Slavery Statement

Mondiale VGL Group Limited, is a private company in New Zealand and is the parent company of the Plasia Holdco Pty Ltd Australian consolidated group. Plasia Holdco has subsidiaries in Europe and the United States and joint ventures based in Singapore and India.

This statement is a joint statement covering the following reporting entities:



### Key

- - Australian reporting non-trading entities under the Modern Slavery Act 2018 (Cth) ('Act')
- - Australian reporting trading entities under the Modern Slavery Act 2018 (Cth) ('Act')
- - Australian non reporting trading entity under the Modern Slavery Act 2018 (Cth) ('Act')
- - Foreign entity not reporting under the Modern Slavery Act 2018 (Cth) ('Act')

Mondiale VGL Group Limited ('Mondiale VGL Group') is the New Zealand based parent company for the global group and is not a reporting entity under the Modern Slavery Act 2018 (Cth) ('Act') that commenced operation on 1 January 2019.

Plasia Holdco, Plasia Bidco, United Global Logistics and Australian trading entities Mondiale VGL and MFS Logistics (**collectively known as Mondiale VGL Pty Ltd** for the purpose of this statement) are subject to the Act. The Act requires reporting entities subject to the Act, to produce an annual Modern Slavery Statement. This statement covers the financial year ended 30 June 2022 and is due by 31 December 2022. We have considered how to lodge this statement and have determined that a joint statement is appropriate given the synchronicity of our policies, practices and many of our suppliers.

Mondiale VGL Pty Ltd acquired a majority stake in Customs Agency Services Pty Ltd ('CAS') during the financial year ended 30 June 2022. CAS takes a strong position on modern slavery and is committed to the principles and intent of the Act but is not a reporting entity under the Act due to its annual revenue not meeting the required level. Mondiale VGL Pty Ltd modern slavery policies and practices will be rolled out to CAS by 30 June 2023 for consistency across the group's Australian entities.

## Structure and Operations

Mondiale VGL Pty Ltd is one of Australia's largest privately-owned international freight forwarding companies and operates an extensive global network across 55 locations in more than 15 countries including the following locations: Germany, Italy, Spain, Netherlands, Belgium, Turkey, India, Singapore, Indonesia, Malaysia, Thailand, Vietnam & the United States.

The Company employs over 500 people in Australia and 1,500 globally. Within Australia, the Company provides a fully integrated logistics solution including forwarding, clearance, warehouse, distribution and cartage. We also provide a range of freight forwarding services in our global locations.

## Supply Chain

Our supply chain includes the purchase of shipping line services, and of products and services needed for the business' day-to-day operations including office supplies, employment and training of staff, external legal advice, leasing of rental space, IT infrastructure and support services and travel. Within Australia and New Zealand our supply chain also includes the purchase of PPE to support our transport and warehousing divisions and the purchase of trucks, trailers and forklifts. Mondiale VGL Group's Finance & Administration, and People & Culture teams have various policies in place that support our day-to-day operations to ensure all staff and suppliers (including any agencies who provide labour) meet Mondiale VGL Group's core values.

## Modern Slavery Risks

Due to our nature as a global entity, we note that our business operates in high-risk geographical locations. This risk however is significantly reduced by the nature of the labour performed within our global operations, performing mainly service-only functions.

Mondiale VGL Pty Ltd may be at risk of involvement in modern slavery because some work performed by suppliers may be performed remotely, at sea and outside of normal business hours, including at night. This makes it more difficult to oversee the performance of work and working conditions.

We have assessed the risk regarding the use of labour hire firms. Given that these firms are only being engaged within Australia and New Zealand, we have assessed the risk as low.

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

Our group has arms-length commercial relationships with its suppliers. This means that our suppliers may be engaged in modern slavery practice and we are not aware of that fact.

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

As part of our approach to assessing and addressing any modern slavery risks, we have completed the following steps over the 30 June 2022 financial year.

1. Developed a global policy on modern slavery in operations and supply chains.
2. Subscribed to a Learning Management System (LMS) that includes Australia-focused modern slavery awareness training for employees and managers.
3. Continued to conduct due diligence on local and global supply chains through the use of surveys and reviews of available supplier policies and practices. We continue to target our larger suppliers and those in assessed risk areas for review.
4. Addressed any potential modern slavery risks that were identified as a result of the above due diligence processes.
5. Updated our supplier code of conduct to ensure it contains terms that are consistent with the Act.

We were not able to complete the following action points that were set out in our 2021 Modern Slavery Statement due to resource constraints:

1. Reviewing supplier contracts to ensure they contain terms that are consistent with the Act; and
2. Setting up a program to measure effectiveness through performance monitoring.

The above action points will be prioritized over the next financial year. We also undertake to complete the following steps in that timeframe:

1. Roll out the global policy on modern slavery in operations and supply chains to our global subsidiaries to support previous initiatives we have undertaken with them on this subject;
2. Roll out modern slavery awareness training for staff and management in Australia via the LMS and consider its potential use for similar initiatives overseas;
3. Continue to conduct due diligence on local and global supply chains; and
4. Take steps to address any potential modern slavery risks identified.

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

Given that we have assessed the risks within our organisation as low, our priority is to work with current and future suppliers to monitor the steps they are taking to assess and address modern slavery risks.

Part of the assessment will also include tracking the actions we take over the next financial year and regularly reviewing our current actions.

Through the use of questionnaires provided to suppliers and global controlled entities we are also able to identify any areas which need further attention internally and develop policies and solutions to decrease the risks of modern slavery in these areas. We are also able to work with suppliers to check how they are progressing any actions they have put in place to address modern slavery risks.

## **Consultation Process with Entities Owned or Controlled**

We have notified our global subsidiaries regarding requirements under the Modern Slavery Act and have endeavored to extend and implement similar actions and policies across that group. The roll out of the global policy on modern slavery in operations and supply chains will provide additional support in this area in the next financial year.

Last year, we did an assessment of the various similarities and differences between the trading entities we own or control when it came to suppliers and policies. As part of the assessment, it was determined that policies, practices and suppliers were very similar across those entities and only minor changes were required to synchronise our policies.

Mondiale VGL Group Ltd consulted with key officers of Mondiale VGL Pty Ltd in the preparation of this statement. The Directors and the Group CEO were made aware of the preparation of this Statement and were afforded the opportunity to provide their input.

## **Other Relevant Information**

We are committed to operating our business lawfully and ethically and in only working with suppliers that are aligned to our values. As part of our Supplier Code of Conduct, we expect our suppliers to operate in accordance with all applicable 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.

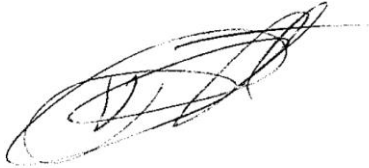
Mondiale VGL Pty Ltd maintains an Employee Code of Conduct which sets out certain standards of behaviour to assist its directors, officers, employees, and contractors in proper ethical and legal decision making when representing the business and performing their day-to-day duties. Our Code is provided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

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

## Statement

This Modern Slavery Statement was approved by Mondiale VGL Group Limited's Board of Directors on 15 December 2022.

Signed:

A handwritten signature in black ink, appearing to be 'John Sargent', written in a cursive style.

John Sargent  
Director  
Mondiale VGL Group Ltd