



MODERN SLAVERY STATEMENT 2023

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

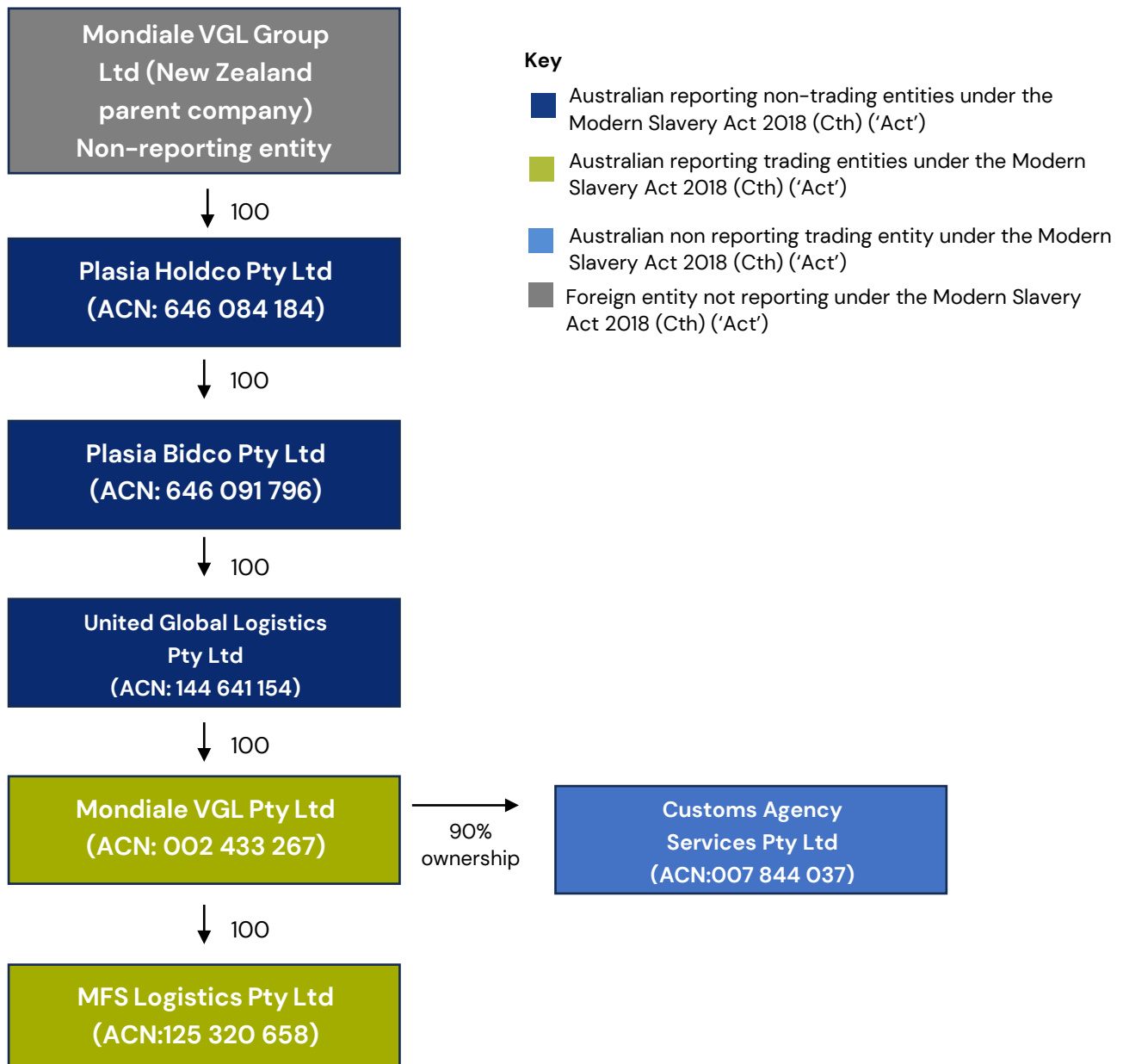
MONDIALE VGL

Modern Slavery Statement 2023

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. Additionally, Plasia Holdco has wholly and majority-owned subsidiaries in Europe and the United States and minority investments in companies domiciled in Singapore and India.

The Australian Modern Slavery Act 2018 (Cth) requires certain entities to report annually on the risk of modern slavery in their operations and supply chains, and the actions undertaken to address those risks.

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



Mondiale VGL Group Limited is the New Zealand based parent company for the global group (the 'MVGL Group') and is not a reporting entity under the Modern Slavery Act 2018 (Cth) ('Act').

Plasia Holdco, Plasia Bidco, United Global Logistics, and the Australian trading entities MFS Logistics and Mondiale VGL (collectively known as 'Mondiale VGL Australia' 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 2023 and is due by 31 December 2023. 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 Australia 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.

The MVGL Group is committed to operating in accordance with its ethical, social, and environmental values and implementing suitable actions accordingly. To achieve this, the MVGL Group has implemented policies and practices to support robust compliance practices within its own business and encourage suppliers to do the same.

Structure and Operations

Mondiale VGL Australia is one of Australia's largest import sea freight forwarding companies and the MVGL Group operates an extensive global network across 55 locations in 19 countries including:

Wholly Owned or Majority Owned Subsidiaries:

- Australia
- Belgium
- China
- Germany
- Hong Kong
- Italy
- Netherlands
- New Zealand
- Philippines
- Spain
- Switzerland
- Turkey
- USA

Minority Investments in Associate Businesses

- India
- Indonesia
- Malaysia
- Singapore
- Thailand
- Vietnam

The Company employs over 500 people in Australia and the MVGL Group employees 1,500 globally. All operations are overseen by executives based in New Zealand, Australia, and Italy. New Zealand, Australia and Italy are each considered to have a low prevalence of modern slavery and governments that take strong actions against it.¹

¹ Walk Free 2023 Global Slavery Index, available from <https://www.walkfree.org/global-slavery-index/downloads/>

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, labour hire agencies, cleaners, external professional advisers, leasing of rental space, IT infrastructure and support services and travel.

Within Australia and New Zealand our supply chain also includes the purchase of property, plant and equipment 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 and Supplier Code of Conduct.

Policies in relation to Modern Slavery

As Mondiale VGL is committed to ensuring that modern slavery or human trafficking does not occur in any part of our business or supply chain, we have implemented a Modern Slavery Policy and Supplier Code of Conduct which covers, among other things human and labour rights. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity.

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.

Mondiale VGL Australia 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 Australian employees upon commencement of employment. Employees are required to comply with this Code of Conduct and all other policies at all times.

A whistleblower policy is in place to encourage employees to report any concerns, suspicion or knowledge of any instance of human trafficking, forced labour or debt servitude.

We have subscribed to a Learning Management System (LMS) that includes Australia-focused modern slavery awareness training for employees and managers.

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

Potential Modern Slavery Risks

Business Operations

The MVGL Group's business is predominantly an office-based, service business, with the majority (74)% of its workforce located in countries reported as having a low prevalence of modern slavery and governments that take strong actions against it.¹

The Australian operations do have warehousing and transport offerings, where labour hire companies may be used to resource those functions in limited circumstances.

The Company only engages reputable labour hire companies that are required to meet certain screening criteria and satisfy the terms of our Supplier Code of Conduct. Those workers carry out their role under the oversight of Mondiale VGL Australia senior managers.

Geographical

The majority of our MVGL Group operations are Australasian, but we do have Group operations in higher ranking countries for modern slavery¹, such as Turkey and the Philippines. As previously noted, these operations are overseen by New Zealand, Australia and Italian executives and the New Zealand-based Head Office provides shared services oversight for the finance, human resources and compliance functions.

Supply Chain

There is a risk of modern slavery in our supply chain 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.

However, we engage with reputable shipping, transportation, labour hire, IT services companies and cleaners, most of which have established modern slavery compliance programmes in place.

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

Our MVGL Group has arms-length commercial relationships in place with its suppliers. This means that our suppliers may be engaged in modern slavery practice and we are not aware of that fact. However, were we to become aware of any modern slavery practices, we would take immediate action to address them.

We have in place a Supplier Code of Conduct that we expect our suppliers to adhere to.

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 2023 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. This system has now been in operation for 12 months in Australia.
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. Mondiale VGL Australia's modern slavery policies and practices were rolled out to Customs Agency Services (CAS) for consistency across the MVGL Group's Australian entities.
6. Updated our Supplier Code of Conduct to ensure it contains terms that are consistent with the Act.
7. Commenced process to review supplier contracts to ensure they contain terms that are consistent with the Act.

We also undertake to progress the following steps over the next financial year:

1. Continue to 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. Introduce modern slavery awareness training for staff and management in locations outside Australia through our Learning Management System currently in place.
3. Ensure appropriate grievance mechanisms and remediation procedures are further operationalised;
4. Continue to conduct due diligence on local and global supply chains; and
5. Take steps to address any potential modern slavery risks identified.

Assessment & Effectiveness of our Actions

Given that we have assessed the risks within our direct organisation as relatively 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 in their organisations and supply chains. 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.

Statement

This Modern Slavery Statement was approved by Mondiale VGL Group Limited's Board of Directors on 21 December 2023.

Signed:

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Heath Kerr

Director

Mondiale VGL Group Ltd

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Ed Conway

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