LINX CARGO CARE GROUP

Anti-Slavery and Human Trafficking Policy

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1. Introduction

LINX Cargo Care Group Holdings Pty Ltd (**LINX**) values human rights and is committed to ensuring that all business is conducted according to the highest ethical and professional standards and in compliance with applicable human rights and modern slavery legislation.

Modern Slavery is a criminal offence under the Criminal Code Act 1995 (Cth) and is defined in accordance with the definition provided in the *Modern Slavery Act 2018* (Cth) (**MSA**), as conduct that constitutes:

1. slavery;
2. servitude;
3. forced labour;
4. deceptive recruiting;
5. forced marriage;
6. debt bondage;
7. trafficking in persons; and
8. the worst forms of child labour and child abuse; including all forms of child exploitation and the production, dissemination or possession of child abuse material;

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 (collectively **Modern Slavery**).

For the avoidance of doubt, Modern Slavery is only used to describe serious exploitation and does not refer to practices like substandard working conditions or underpayment of workers (although these practices are also illegal and may be present in some situations of modern slavery).

2. Application

This Anti-Slavery and Human Trafficking Policy (**Policy**) applies to LINX and its subsidiaries with operations in Australia (collectively, the **Company**).

Anyone working on the Company's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and suppliers (collectively, **Personnel**) must read, understand and comply with this Policy.

This Policy should be read in conjunction with the LINX Code of Business Conduct and Ethics (the **Code**) which serves as a guide for how to conduct yourself as a member of the Company's team as well as the Third Party Due Diligence Procedure, which outlines the Company's approach to review third parties for Modern Slavery risks prior to engagement.

3. Purpose

This Policy sets out:

(a) the Company's zero tolerance to Modern Slavery and commitment to respecting human rights;

(b) actions taken by the Company to identify and address Modern Slavery risks;

(c) behaviour expected of all Personnel in respect of this Policy; and

(d) ramifications for breaches of this Policy by Personnel.

4. Zero tolerance approach to Modern Slavery

The Company is committed to eradicating human rights abuses and instances of modern slavery and has a zero tolerance approach to all forms of Modern Slavery within its business and supply chain.

The Company is committed to acting ethically and with integrity in all its business dealings and relationships and endeavours to ensure that it, and its Personnel, comply with all applicable laws such that it:

(a) does not use any form of forced, compulsory bonded or involuntary labour;

(b) provides that all work is freely chosen and the working conditions are safe and fair, for all Personnel;

(c) ensures that no worker is required to provide money as a condition of their employment and workers are allowed to maintain control of their identification documents; and

(d) ensures that no child labour is employed, in line with minimum age laws, within the countries that it operates.

The Company endeavours to promote transparency in its own business and in its approach to tackling Modern Slavery throughout its supply chains, consistent with its disclosure obligations under the MSA.

5. Actions taken to address risks of Modern Slavery

The Company has put measures in place that are designed to prevent and detect Modern Slavery within its business and supply chain, as follows:

(a) implementation of a policy which articulates the Company's commitment to prevent acts of Modern Slavery and reduce risks of acts of Modern Slavery within its operations and supply chain, being this Policy;

(b) publication of this Policy on the Company's website to ensure it is readily available to Personnel;

(c) the assessment of Modern Slavery risks within the Company and its supply chains and the undertaking of further due diligence where material risks are identified;

(d) the development of effective, efficient and transparent controls to reduce exposure to Modern Slavery risks;

(e) the adoption of anti-slavery wording in procurement contracts which includes:

a. an obligation on the supplier to comply with the MSA and any relevant State based Modern Slavery legislation; and

b. an obligation on the supplier to do all things (and must procure that its suppliers and subcontractors do all things) reasonably requested by LINX in order to facilitate LINX's compliance with the MSA or the relevant state based Modern Slavery legislation or this Policy;

(f) training of all relevant individuals throughout the Company so that individuals can recognise Modern Slavery practices and take steps to avoid the same provided at least on an annual basis and as otherwise deemed necessary; and

(g) preparing an annual Modern Slavery Statement if required by the MSA or any relevant State based Modern Slavery legislation and publication of such statements on its website so that it is readily available for review by Personnel and the public.

(h) continual reviews are performed on our labour force to minimise the risk of Modern Slavery in our workforce and labour hire.

6. Expected behaviour of Personnel

The prevention, detection and reporting of Modern Slavery in any part of the Company's businesses and supply chains is the responsibility of all those working for it or under its control.

All Personnel are required to avoid any activity that might lead to, or suggest, a breach of this Policy or infringement of any applicable law.

7. Reporting

Personnel are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that they become aware of.

If any Personnel suspects or believes that a breach of this Policy has occurred or is likely to occur, they must report the matter as soon as possible, as follows:

(a) if the Personnel is an employee, director or officer of the Company, to their manager and the Company's Legal Team; or

(b) if the Personnel is not an employee, director or officer of the Company, to their contact at LINX who should then promptly report to their manager and the Company's Legal Team; or

(c) in all other cases, via the LINX Reporting Hotline (1800 152 863) as soon as possible.

Further information on the Reporting Hotline is available in the Code and the LINX Whistleblower Policy or on the intranet.

The Company encourages openness and is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith in accordance with this clause. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any Personnel believes that they have suffered any such treatment, they should inform the Company's Legal Team immediately.

8. Breaches of this Policy

Any employee who breaches this Policy by engaging in or conspires to engage in any Modern Slavery conduct will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and, if warranted, legal proceedings may be brought against you.

The Company may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this Policy.

9. Key Contacts

If you have any questions about this Policy, please contact LINX Legal Counsel, Roslyn Lewis, or other members of the Legal Team via legal@linxcc.com.au.