



Toll Group
Level 7, 380 St Kilda Road
Melbourne VIC 3004
Australia

T +61 3 9694 2888
F +61 3 9694 2880
www.tollgroup.com

Toll Holdings Limited
ABN 25 006 592 089

Modern Slavery Act 2015 (UK) FY2018 Statement

Toll Holdings Limited (Australian registered Company Number 006 592 089 and its subsidiaries) (“Toll”) is a world-class integrated global logistics provider - and proudly part of Japan Post – with over 40,000 people in more than 50 countries.

Our Business

Toll provides customers across the globe with an enormously diverse range of transport services and logistics solutions:

- **Global Forwarding:** provides a full suite of international freight forwarding from complex supply chain solutions to port-to-port freight forwarding, specialising in Asia inbound and outbound trade lanes.
- **Global Logistics:** specialist contract logistics division, which provides a broad range of sophisticated transport, warehousing and value-added services around the Asia Pacific region, including warehouse logistics, mining services, energy logistics, dedicated transport services, liquid distribution, relocation management, remote and resource logistics, aviation services and helicopter services.
- **Global Express:** provides express freight within Australia and New Zealand.

Toll also provides operational services, including linehaul and Toll People.

Our Policies

Toll invests time and expertise in ensuring that it makes a positive contribution in all of the jurisdictions in which it operates. To that end, we have developed a range of company policies, including in the areas of business ethics, workplace relations, occupational health & safety and environmental management. Toll considers that, on the whole, this suite of policies provides the appropriate environment so that we work to live up to our ethical standards and do not knowingly allow human slavery or abuse to enter our business or supply chain.

Employees/Recruitment

Toll's governance documents that address the types of activities contemplated under the Modern Slavery Act 2015 (UK) include:

- Toll Group Code of Practice;
- Toll Group Anti-Human Trafficking and Modern Slavery Policy;
- Toll Group Ethical Employment Policy;
- Toll Group Pre-Appointment Screening Policy;
- Toll Group Diversity Equal Opportunity Policy; and
- Toll Group Protected Disclosure Policy.



Suppliers

Toll's procurement process involves a range of suppliers across multiple countries. Toll is committed to ethical business practices. We respect human rights and take steps to ensure that human slavery or abuse do not knowingly enter our supply chain.

The Toll Group Supplier Code of Practice includes the requirement to comply with all employment laws and ethical labour policies. All Toll contractors, consultants, vendors and suppliers must comply with Toll's Supplier Code of Practice. Toll's standard procurement terms and conditions make it a condition of engagement that any third party suppliers do not engage in activities that are inconsistent with the Supplier Code of Practice.

The Supplier Code of Practice reserves the right for Toll to audit suppliers and their operations. Toll can take action deemed appropriate, including termination, if suppliers do not follow the Supplier Code of Practice.

The Toll Group Code of Practice and the Toll Group Supplier Code of Practice can be found here: <https://www.tollgroup.com/about/policies-procedures/toll-code-practice>

Our Compliance Framework

Toll's policies are supported by Toll's compliance framework, which comprise the following:

1. Compliance reporting – regular compliance reporting is provided by management to Toll's Board of directors and Board committees.
2. Staff training - Toll provides training to its staff to reinforce compliance with Toll's Ethical Employment Policy. The training is required to be conducted with new and existing staff.
3. Audit and Assurance - Toll undertakes an internal audit and assurance program which evaluates control and compliance processes on a risk basis. Depending on the risk assessment, such audits may include compliance with regulatory risks and company policy associated with labour laws, working hours, employee pay levels, and adherence to employee 'right to work'/work permit requirements.
4. Incident monitoring and escalation - Toll operates a global Disclosure Hotline which enables employees and contractors to report suspected misconduct anonymously and via an independent reporting line. Fraud, improper conduct (including dishonest, illegal or corrupt conduct) or Code of Practice breaches relating to employees, agents, contractors or suppliers can be reported through the Disclosure Hotline. All reported allegations are reviewed and appropriate investigations conducted. This may result in corrective actions, disciplinary actions and learnings.

Assessing our Risk and Priorities

In relation to the risk of slavery and human trafficking, during the reporting year, Toll took steps to:

- Develop the Toll Group Anti-Human Trafficking and Modern Slavery Policy, which was adopted by the Board in September 2018;
- Finalise the Compliance / Business Integrity and Security Threat and Vulnerability Assessment, including consideration of human trafficking and modern slavery as a



compliance threat, and input from the Global Slavery Index. This assessment will inform our ongoing business integrity program, as appropriate; and

- Undertake a review of the Australian employee screening processes and is preparing to implement enhancements including widening the scope of right to work verification to include all employees, contractors and subcontractors in Australia. Toll's long term goal is to review each operational jurisdiction and roll-out employee screening processes as appropriate.

Subsequent to the reporting year, Toll has taken steps to:

- Update the Toll Group Code of Practice, to reflect Toll's commitment to human rights and preventing human slavery or abuse from knowingly entering its supply chain;
- Initiate a review of its Australian subcontractor engagement and on-boarding processes, which will include consideration of compliance with human rights and ethical working conditions requirements. Toll's long term goal is to progress this to an international review; and
- Initiate a review of supplier due diligence processes to identify and prioritise potential risk areas across the operational divisions and supply chains.

Continuous Improvement

Toll will continue to review and update its policies, practices and procedures as required to maintain appropriate safeguards against any mistreatment of persons involved in its supply chain or its business.

Training and Awareness

Toll conducts online and face to face compliance training with its employees to reinforce compliance with the Toll Group Code of Practice and supporting policies. The training is conducted with new and existing employees. This training advises employees of ethics and legal principles that contribute to a culture of legal awareness and ethical practice within Toll.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015(UK) and constitutes Toll's slavery and human trafficking statement for the financial year ending on 31 March 2018. Enquiries should be directed to Toll's Global Head of Security at compliance@tollgroup.com.

Michael Byrne
Managing Director
27 September 2018