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Toll Holdings Limited
ABN 25 006 592 089

Modern Slavery Act 2015 (UK) FY2019 Statement

Toll Holdings Limited (Australian registered Company Number 006 592 089) and its subsidiaries (“**Toll**”) respect ethical labour practices and value and promote diversity. Consistent with these principles, Toll takes a zero-tolerance approach to any form of modern slavery in its operations or supply chains.

This statement, which is intended to meet the requirements of section 54 of the Modern Slavery Act 2015 (UK), describes steps taken by Toll during the financial year ending 31 March 2019 as part of its efforts to decrease the risk of modern slavery taking place in its operations or supply chains.

Our Structure, Business and Supply Chains

With over 125 years’ experience, Toll, proudly part of Japan Post, operates an extensive global logistics network across 1,200 locations in more than 50 countries. Toll’s 44,000 employees provide a diverse range of transport and logistics solutions covering road, air, sea and rail to help customers meet their global supply chain needs.

Toll provides a diverse range of services to customers across the world, including:

- **Freight:** 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.
- **Logistics:** specialist contract logistics providing a range of customised 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.
- **Express Services:** express freight of documents and parcels through to critical spare parts and medical supplies within Australia and New Zealand.
- **Business Support Services:** a suite of business support services that includes recruitment and training, design print and promotion, mailroom services and relocation management.

To assist in the delivery of these services, Toll works with an extensive network of suppliers, subcontractors and agents.

In the UK, Toll offers freight forwarding solutions and international delivery services to customers operating in or from the UK. This can include air freight, sea freight, multimodal freight solutions and customs clearance.

Toll Code of Practice and Policies

Toll invests considerable time and expertise to make a positive contribution in all of the jurisdictions in which it operates. To that end, at a group level, Toll has a governance framework in place that includes the Toll Group Code of Practice (“**the Code**”) and supporting policies and procedures. Toll’s



position on ethical labour and the elimination of modern slavery is articulated in the Code and supporting internal policies and procedures.

Each business in and employee of the Toll Group is required to follow these expectations. Toll considers that, on the whole, its implementation of the Code and policies establishes an ethical culture and environment in which knowingly allowing human slavery or abuse to enter Toll's operations or supply chain will not be tolerated.

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** sets out the principles of group-wide policies as well as the behaviours that all employees are expected to display when acting for or on behalf of Toll. This includes expectations about labour laws and child labour. The Code is available on Toll's website, at <https://www.tollgroup.com/about/policies-procedures/toll-code-practice>;
- **Toll Group Anti-Human Trafficking and Modern Slavery Policy** highlights Toll's zero tolerance approach to any form of modern slavery in its operations and supply chains;
- **Toll Group Ethical Employment Policy** sets out Toll's expectations on standards derived from the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, including diversity, equal opportunity, human rights, freedom of association, employment conditions and child labour;
- **Toll Group Employment Screening Policy** sets out Toll's expectations about conducting employment checks for various positions prior to appointment;
- **Toll Group Diversity Equal Opportunity Policy** further explains Toll's expectations in relation to diversity and equal opportunity; and
- **Toll Group Protected Disclosure Policy** encourages individuals to raise suspected misconduct, including breaches of the Code.

Toll takes breaches of its Code and Toll policies seriously, investigates suspected failures to comply with the Code or Toll policies that it becomes aware of, and takes a timely and proportionate approach to implementing disciplinary or remedial action.

Training

Toll continues to raise awareness of modern slavery with training and eLearning on the Code and ongoing consultation on modern slavery risks with higher-risk areas of the business such as its Procurement department.

Suppliers

The Toll Group Supplier Code of Practice ("**Supplier Code**") sets out the behaviours Toll expects from suppliers. This includes Toll's expectation that its suppliers will act with respect and comply with applicable employment and workplace laws and regulations, including labour and child labour laws.



The Supplier Code reserves Toll's right to audit suppliers and their operations. If a supplier fails to act consistently with the Supplier Code or specific contractual obligations, this may result in remedial action or termination of a contract. The Supplier Code is available on Toll's website, at <https://www.tollgroup.com/about/policies-procedures/toll-code-practice>

Toll Disclosure Hotline

The Toll Disclosure Hotline, hosted by a service provider external to Toll, enables employees and suppliers in certain Toll locations to anonymously report suspected misconduct, including matters relating to labour practices and human rights. All allegations received are reviewed and appropriately investigated. Toll takes a timely and proportionate approach to implementing corrective or disciplinary actions and learnings.

Steps taken to Assess and Manage Risk

Toll takes a zero-tolerance approach to any form of modern slavery in its operations and supply chains. In support of this statement and to strengthen its oversight over these risks, during the reporting year, Toll undertook multiple initiatives including:

- In September 2018, the Toll Holdings Ltd Board approved the Toll Group Anti-Human Trafficking and Modern Slavery Policy, which was subsequently communicated across Toll;
- Updating the Toll Group Employment Screening Policy and implementing employee screening processes in all Toll locations including Australia, China, Denmark, Finland, Germany, Hong Kong, India, Indonesia, Italy, Korea, Malaysia, Netherlands, New Zealand, Norway, Singapore, South Africa, Sweden, Thailand, United Kingdom, United Arab Emirates, USA and Vietnam;
- Reviewing and amending various Australian subcontractor template agreements (including for owner-driver and representative/agent subcontractors) to incorporate a requirement to comply with Toll's policy requirements and applicable laws as well as reviewing and amending the Australian fleet operator subcontractor template agreement to include specific requirements to comply with applicable modern slavery laws. Toll's long-term goal is to progress this to a phased international review;
- Initiating a cross-functional working group to systematically assess the risk of modern slavery in Toll's business and global supply chain and review its due diligence processes. Due to the size and scope of Toll's operations, this is ongoing and contemplated to be a long-term project; and
- Conducting targeted due diligence on select suppliers in high-risk industries such as a facility management services company providing cleaning services across multiple Toll sites (in Australia) to assess whether they are applying industry award rates, as well as Toll's preferred uniform supplier to assess whether its manufacturing processes are ethical.

Continuous Improvement

Toll recognises the need to build on its understanding, oversight and management of modern slavery risks in its operations and supply chains on an ongoing basis. Toll will continue to strengthen its ability to identify, assess and address modern slavery risks, including progressing ongoing enhancements of its due diligence processes and controls.

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



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015(UK) and constitutes Toll's modern slavery and human trafficking statement for the financial year ending on 31 March 2019. Enquiries should be directed to the Chief Compliance and Security Officer at compliance@tollgroup.com.

This statement was approved by the Toll Holdings Ltd Board on 18 September 2019.

A handwritten signature in black ink, appearing to be "M Byrne", written over a faint circular stamp.

Michael Byrne
Managing Director
25 September 2019