



Modern Slavery & Human Trafficking Statement FY25

Introduction

Modern slavery describes the most serious forms of exploitation including trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage and the worst forms of child labour.¹ These abuses can occur in all industries and sectors and distorts global markets and responsible business practices.²

Toll Holdings Limited, and our subsidiaries respect ethical labour practices and value diversity. Toll takes a zero-tolerance approach to any form of human rights abuses, including modern slavery in our operations and supply chains and we expect that all our employees, suppliers, subcontractors and agents uphold these values.

This statement is published by Toll Holdings Ltd (Australian registered Company Number 006 592 089) and our subsidiaries in compliance with section 54 of the United Kingdom's *Modern Slavery Act 2015* and Australia's *Modern Slavery Act 2018* (Cth). It describes the steps taken by Toll Holdings Ltd and our subsidiaries in the financial year ending 31 March 2025 to assess and address modern slavery.

Structure, Operations & Supply Chain

Our Structure & Operations

With over 130 years' experience, Toll operates an extensive global logistics network with direct operations in 30 countries as well as strong partnerships with agents in 140 countries. With approximately 14,000 employees around the globe, Toll provides a diverse range of freight forwarding, transport and logistics solutions covering road, air, sea and rail to help customers meet their global supply chain needs. Proudly part of Japan Post, with dual headquarters in Australia and Singapore, Toll provides a diverse range of services to customers across the world.

International Freight Forwarding: Toll provides a full suite of international freight forwarding solutions including air, ocean, road, rail, intermodal and multimodal, customs brokerage and clearance and specialised freight services.

Logistics: We provide **3PL/4PL logistics services** across the Asia Pacific region including warehousing, distribution, specialised logistics, remote and resource logistics, supply chain solutions, eCommerce, aviation services and value-added services.

Through its subsidiary, **Toll People**, Toll provides labour hire and recruitment services in Australia and places approximately 14,000 people in logistics jobs each year.

Toll's government & defence business provides relocation services to Australian defence personnel. Each year around 23,000 relocations are completed. In New South Wales, Toll has operated an aeromedical service since 2017 conducting approximately 3,000 helicopter rescue missions each year. Toll also provides travel, medical assistance and related services globally to support Refugee and Humanitarian Aid Programs.

For further details of the services we offer, please refer to our website [Toll Group - Providing Global Logistics & Transportation Solutions](#)

¹ Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities

² Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities



Our Supply Chain

To assist in the delivery of these services, Toll works with an extensive network of suppliers, subcontractors, and agents. These include the suppliers of products and services used in our transport and warehousing activities, such as trucks, planes, ships, helicopters, materials handling equipment, IT equipment and personal equipment and clothing. Our supply chain also includes the services provided by subcontractors and agents, mainly for the transport of goods. This is particularly relevant for Freight/Global Forwarding, for which Toll engages a number of third parties to assist with completing these orders³. In many cases we have long-standing relationships with these businesses, and in other cases short-term arrangements are made based on the requirements of our clients. An overview of the countries in which we operate as well as those in which we work with network partners can be seen below.

Risks of Modern Slavery in Operations & Supply Chains

Operating in the global logistics sector, we are aware of the potential for Toll to cause, contribute to or be linked to modern slavery through our operations and supply chains.⁴

Operations

Taking into account the activities of Toll's global operations, there is a risk of causing or contributing to modern slavery through the use of labour in vulnerable populations, high risk geographies or through the engagement of recruitment agencies. Whilst Toll operates worldwide, nearly half of employees and a significant proportion of suppliers are based in Australia and New Zealand which somewhat decreases the geographical risk. However, as our company continues to grow both locally and globally, we are aware of the risks and the need to address these in an appropriate manner.

Supply Chain

Toll works with an extensive network of suppliers, subcontractors and agents to provide the vast array of services around the globe. As such, Toll is at risk of contributing to or being directly linked to modern slavery abuses relating to the activities of these business relations. The extent of these is dependent on a number of factors including the level of human rights protection and/or enforcement in the countries where they operate or source from, use of labour hire and outsourcing practices. This is also applicable to suppliers from which we source the products and services we require to operate.

Actions Taken to Assess and Address the Risk of Modern Slavery

We are taking a long-term systematic approach to integrating an ethical supply chain framework and increasing engagement with suppliers to identify risk, assess and address modern slavery.

Policies & Governance

Toll is committed to acting ethically and with integrity and transparency in all business dealings. Toll respects ethical labour practices and values and promotes diversity. Consistent with these principles, Toll has a zero tolerance approach to any form of modern slavery in its operations or supply chain. Modern slavery encompasses servitude, forced labour, debt bondage and human trafficking.

In line with our values are Toll's policies and standards, which influence our behaviour towards Modern Slavery:

- Toll Group Code of Practice
- Toll Group Supplier Code of Practice
- Toll Group Anti-Human Trafficking and Modern Slavery Policy
- Toll Group Anti Bribery and Anti-Corruption policy
- Toll Group Ethical Employment Policy
- Toll Group Health and Safety Policy

³ <https://www.tollgroup.com/freight>

⁴ Commonwealth Modern Slavery Act 2018 – Guidance for reporting entities p40



- Toll Group Respect at Work Policy
- Toll Group Workplace Behaviours Policy
- Toll Group Risk Management Policy
- Toll Group Domestic and Family Violence Policy
- Toll Group Background Screening Policy
- Toll Group Diversity & Equal Opportunity Policy
- Toll Group Privacy Policy
- Toll Group Procurement Policy
- Toll Group Security Policy
- Toll Group Whistleblower Policy
- Toll Group Serious Misconduct Policy

The day-to-day responsibility for developing these policies and overseeing compliance is assigned to relevant departments including Group Compliance, Group HSSE, Group HR, Group Procurement and Group Legal.

These policies and standards are upheld in everything we do. We consider that, on the whole, the implementation of our company values 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. Some of these policies are publicly available on our website: Policies & Procedures (tollgroup.com).

Supplier Governance Framework

The Toll Group Supplier Code of Practice ("**Supplier Code**") sets out the behaviours Toll expects from suppliers.

This includes Toll's expectation that our 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 of Practice is available on our website.

Anti - Modern Slavery Program & initiatives

The Anti- Modern Slavery Program is including 5 phases as follows:

1. Establishing an Anti-Modern Slavery Steering Committee as a review panel and sounding board to develop, progress and remediate any identified modern slavery risks as a result of the actions taken under the Anti - Modern Slavery Program;
2. Collecting the relevant information and data through internal documents and interviews with key stakeholders;
3. Performing an independent risk assessment of the operations and supply chain in high risks locations as a first tier to establish a gap analysis;
4. Submitting the results to the Anti - Modern Slavery Steering Committee;
5. Developing and implementing a remediation plan to address potential gaps or issues.

On the 25th of July 2023, the Anti- Modern Slavery Steering Committee was re-instated and renewed on the 1st of July 2025 to progress the remediation plan and support the organization with the establishment of an adequate Anti Modern Slavery Program.

The Anti- Modern Slavery Steering Committee has been divided into working groups to review and implement corrective actions or enhancements as required to ensure strict compliance with our policies.

Toll has developed a roadmap to complete the remediation plan by end of Q4 FY 2025. Once completed, this process will remain an ongoing effort as part of our desire to promote continuous improvement within the business.



In FY25, Toll has advanced a series of targeted initiatives to strengthen our Anti-Modern Slavery framework and proactively close potential gaps in identifying and addressing modern slavery risks.

Group Procurement has implemented a centralised and standardised third-party risk management process as part of Toll Group “*Fit for Growth*” strategy. This initiative strengthens responsible procurement practices by applying a consistent approach to vendor due diligence across our global supply chain, including the assessment of modern slavery risks.

The process provides a single source of truth for all relevant stakeholders, ensuring comprehensive risk coverage, enhanced oversight, and alignment with our ethical business standards worldwide. It also enables improved modern slavery risk assessments and data analytics, which are critical in supporting the organisation’s growth while maintaining robust safeguards against modern slavery.

At Toll, we are committed to creating a workplace where everyone feels safe, valued, and empowered to thrive. Through our strategic priorities—**Care**, **Compete**, and **Grow**—we embed Diversity, Inclusion and Belonging (DIB) into everything we do.

- **Care** is reflected in our dedication to the wellbeing of our people and communities. We foster a culture of safety, sustainability, and inclusion, ensuring every team member feels supported and respected.
- **Compete** is driven by the strength of our diverse global workforce. Inclusion fuels innovation and collaboration, giving us a competitive edge across the 500+ locations in which we operate.
- **Grow** is about building inclusive leadership and equitable systems that enable all individuals to reach their full potential and contribute meaningfully to our shared success.

Toll has already implemented several DIB initiatives, such as the Female Driver Program and employee-led inclusion groups. These provide a strong foundation to build upon but require scaling and integration into core operations.

Since October 2020, Toll is a proud member of TRACE⁵ International which is a globally recognized anti-bribery business association committed to advancing commercial transparency worldwide. TRACE International helps companies conduct business ethically and addressing compliance challenges in general including modern slavery issues. In that respect, Toll has developed in partnership with TRACE International a customized Third-Party Risk Management System to conduct Compliance Due Diligence on its agents’ network globally. The Compliance Due Diligence process includes modern slavery requirements and related compliance controls to ensure the adherence to our Code of Ethics, Practice and compliance policies. This compliance due diligence process will ultimately transition into “Process Unity,” our standardised, Group-level approach driven by the Group Procurement function.

Whistleblower Hotline

Toll’s Group Whistle-blower Policy ⁶has been updated to meet the additional requirements from the Australian *Corporations Act 2001*. The whistle-blower protections in the *Corporations Act 2001* have been expanded to provide greater protections for whistleblowers which are reflected into Toll’s Group Whistle-blower Policy.

This is accompanied by regular communications to maintain internal awareness of the policy and the Toll Disclosure Hotline. This includes widespread communications, staff newsletters which are also cascaded down by Toll Business Compliance Champions network locally to overcome any language barriers. Training are also provided to all employees with additional information and support to those with direct obligations and responsibilities.

The Toll Disclosure Hotline enables employees and suppliers across Toll globally to anonymously report suspected misconduct, including matters relating to labour practices and human rights. It is managed by a third party which helps to maintain anonymity of whistleblowers as well as ensuring data privacy. The system also enables communication between Toll and the whistleblowers to ensure they are kept informed of the outcomes of subsequent investigations. Information on how to access the hotline is readily accessible in multiple languages to ensure all parties have equal access.

⁵ TRACE | Compliance Powered by Community (traceinternational.org)

⁶ Whistleblower Reports (tollgroup.com)



All allegations received are reviewed and appropriately investigated. Toll takes a timely and proportionate approach to implementing corrective or disciplinary actions and learnings. This includes working with managers and other relevant employees to implement necessary changes to prevent any further breaches occurring in the future.

Training

Our ability to identify and respond to human rights issues is heavily reliant on our employees identifying and reporting potential breaches. As such, it is vital that employees have a good understanding of what human rights and modern slavery issues are; how to report them and how to address them.

Toll continues to raise awareness on modern slavery with training and e-Learning on the Code of Conduct. Our induction e-Learning modules for all employees contains sections on Modern Slavery and Human Rights, with reference to our Anti-Modern Slavery Policy.

As part of Toll's Compliance Training Program, a dedicated Anti - Modern Slavery eLearning module is being developed and will be rolled out across all Toll divisions and employees in 2026.

Assessment & Effectiveness of our Actions

Toll is committed to continuously strengthening the effectiveness of its Anti-Modern Slavery processes and has taken proactive steps to refine how we assess and address modern slavery risks.

With the reinstatement of the Anti-Modern Slavery Steering Committee, led by the Compliance function, we are advancing with a clear and structured plan to meet our compliance objectives.

In this financial year, we continue to make significant progress in enhancing compliance efforts, including addressing modern slavery. In 2023, we launched a new compliance initiative, "Driving Compliance Performance," which introduced standardised key performance indicators designed to streamline our approach, close identified gaps, and ensure consistency in our actions. This initiative also underpins our anti-modern slavery remediation plan, reinforcing Toll's long-term commitment to accountability and improvement.

Within our operations, Toll relies on every employee to strictly comply with, and promptly escalate, any suspected breaches or misconduct in line with our Anti-Human Trafficking and Modern Slavery Policy. Oversight is further supported by our global network of compliance champions and subject matter experts, who monitor and evaluate the effectiveness of our actions across the business and supply chain.

For our supply chain partners, Toll has strengthened its centralised Third-Party Management process to embed a consistent and standardised approach across functions and risks. This encompasses strengthened onboarding and rigorous due diligence processes, the integration of Compliance Standard clauses, mandatory Third-Party Certification requirements, and targeted Advisories ensuring that all partners fully align with Toll's Code of Practice, policies, and our specific obligations to combat modern slavery.

To ensure strong governance and oversight, the Toll Global Leadership Team is directly engaged through quarterly compliance updates, which include detailed status reports on the Anti-Modern Slavery Program. These updates equip our leadership with the insights needed to make informed decisions and actively drive continuous improvement.

Our Future

Toll's Anti-Modern Slavery Program, and this statement, reflect extensive consultation and collaboration across multiple areas of our business, including Procurement, Legal, Agent Networks, Operations, Human Resources, Health and Safety, Compliance, and Security. This collective effort demonstrates not only our shared values, policies, and governance frameworks, but also our deep commitment to taking meaningful action to address the risks of modern slavery.

We recognise that tackling modern slavery requires continuous improvement. Toll is committed to strengthening our understanding, oversight, and management of modern slavery risks within our operations and across our



global supply chains. Building on the progress made this financial year, we will continue to enhance our mitigation measures, deepen engagement with stakeholders, and drive improvements across all levels of our business.

This statement has been formally approved by the principal governing body of Toll, the Toll Holdings Ltd Board, on 30 September 2025, reaffirming our leadership's accountability and commitment to combating modern slavery.

A handwritten signature in black ink, appearing to read "Tom Knudsen".

Thomas Knudsen
Executive Chairman
Toll Group