

PIL Australia Pty Ltd

Modern Slavery Statement FY2023

FY2023



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Message from the Managing Director

Modern slavery continues to be a complex global issue affecting nearly every sector, with an alarming 49.2 million people enduring various forms of exploitation worldwide, and a significant portion of 42 million being exploited within international supply chains¹.

As a company entrenched in the global supply chain industry, it becomes essential for us to actively engage in the fight against modern slavery. Our commitment to responsible business practices serves as a cornerstone in ensuring we consistently uphold human rights.

We prioritise ethical standards within procurement and human resource activities, with continuous reviews integrated into our approach to identify and address modern slavery risks. Additionally, we are dedicated to raising awareness through education for both internal staff and external partners. This comprehensive strategy reflects our proactive stance in creating an ethical business environment.

Although our operational risk is low and no modern slavery cases have been identified, we continually review potential risk areas to promptly address any policy gaps. Our modern slavery risk assessment is aimed at future-proofing our operations and aligning with legal obligations and societal expectations.

We are pleased to present our Modern Slavery Statement for FY2023, outlining the ongoing efforts to mitigate modern slavery risks. This underscores our commitment to fostering a world where ethical practices prevail, ensuring modern slavery has no place in our operations or supply chain.

A handwritten signature in black ink that reads "Andrew Maguire". The signature is written in a cursive, flowing style.

Andrew Maguire
Managing Director

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Purpose of the Statement

PIL Australia Pty Ltd recognises and accepts our responsibility to respect the human rights of all people without any discrimination and we are committed to preventing and addressing any risks of adverse human rights impact linked to our operations and supply chain.

As part of our commitment to upholding human rights for all, we take a stand against modern slavery, and commit to working with all our stakeholders to reduce and eradicate the practice of modern slavery and human trafficking within our operations and beyond.

This **Modern Slavery Statement**, made pursuant to the *Australian Modern Slavery Act 2018 (the Act)*, aims to articulate the risks of modern slavery within PIL Australia's operations and supply chains, as well as the steps we have taken, and will take in subsequent reporting periods, to manage and address these risks.

Our Modern Slavery Statement has been prepared in accordance with the Act's mandatory reporting criteria, which are as follows:

A description of PIL Australia entity and its structure;

An outline of our operations and supply chains;

An assessment of the potential modern slavery risks in those operations and supply chains;

Actions taken to assess and address those risks in the reporting period;

Assessment of the effectiveness of such actions and future steps;

Any other information that the reporting entity considers relevant.



Understanding Modern Slavery

Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine personal freedoms. Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

It does not include practices like substandard working conditions or underpayment of workers, though these practices are also harmful and may be present in some situations of modern slavery.

Modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible businesses, and can pose significant legal and reputational risks to entities.

Entities have a responsibility to respect human rights in their operations and supply chains, as outlined in the [*United Nations Guiding Principles on Business and Human Rights*](#). This includes taking steps to assess and address modern slavery risks.

In committing to take action to combat modern slavery in our operations and supply chains, PIL Australia can protect against harm to our business and our clients' businesses and improve the integrity and quality of our supply chains, and our clients' supply chains.



Our Structure and Operations

PIL Australia Pty Ltd (ACN 051 866 409) (previously Pacific Asia Express Pty Ltd) is a Shipping Agency and Logistics Company. PIL Australia employs approximately 90 people, including casuals and part time working out of our offices located in most major Australian port cities, including Darwin and Townsville.

PIL Australia serves as the local Shipping Agent for the following major Shipping lines: Pacific International Lines (PIL) and Mariana Express (MELL). In our role as the local agent for PIL and MELL, PIL Australia collaborates with and utilises suppliers who are contractually engaged by principals PIL and MELL.

PIL Australia operations involves the management of over 100 monthly port calls around Australia, comprising of Container and Multi-Purpose vessels, catering for refrigerated containerised cargo, break bulk as well as general and project cargo.

PIL Australia outsources a small portion of our operations and accounting functions to an offshore team based in the Philippines and Malaysia.



Our People

In FY2023, PIL Australia maintained a workforce of approximately 90 employees, including full-time, part-time and casual employees across our operations in Australia. As part of our HR Policy, we use only reputable recruitment firms and follow all applicable Australian laws and regulations. We regularly review our recruitment procedures and recruitment providers to ensure a transparent and fair hiring process that can assist HR personnel to select the right candidate based on merit and job fit, as well as to avoid discriminatory behavior at all stages of the overall recruitment process.

At PIL Australia, we understand that our most valuable asset is our people. Therefore, we prioritise employee welfare by fostering a supportive work environment, promoting well-being programs, and providing workplace flexibility.

As an employer, PIL Australia takes steps to ensure that all new team members are appropriately qualified and authorised to work in Australia. Remuneration is determined by taking into account the skills and experience required to safely perform the role, current market salary data, any applicable Modern Awards, and parity with colleagues performing the same or similar role regardless of any protected characteristics. Salaries are reviewed on an annual basis to ensure that employees are compensated fairly and appropriately for their time and efforts, as well as their skill development.

Cultivating a culture of continuous learning in our workplace has become a business imperative. Our primary HR goal is to provide people with the skills, tools, and support they need to do their jobs, as well as opportunities to advance their careers.

All our employees have access to grievance channels through which they can express concerns, through WHS incident reporting, Working Together Policies, and our whistleblowing mechanisms. PIL Australia is committed to protecting employees who report wrongdoing and will ensure that all disclosures made in accordance with whistleblowing procedures are treated confidentially and without fear of retaliation.



Our Supply Chain

As a Shipping Agency and Logistics Company, we have established business relationships with our suppliers in order to provide our customers with access to the highest levels of service and efficiency in the transit of their goods.

At PIL Australia, we understand the importance of human rights and dignity, and are committed to working with likeminded businesses, so that we do not intentionally contribute to modern slavery as we carry out our role as a player in the international supply chain. PIL Australia's supply chains include:

Services that contribute to its operations such as the cleaning, catering, security, office equipment maintenance, utilities, IT, telecommunication that service PIL Australia's offices. These service providers are located almost exclusively in Australia.

Partners that contribute to the services PIL Australia offers its clients, including stevedoring companies, sea pilots, tug operators, seaports, trucking companies, storage and logistics companies. These suppliers are based in Australia.

Suppliers of goods to PIL Australia that are not for resale to our clients, such as suppliers of equipment, packaging materials, office stationery, PPE, promotional products. These suppliers are in Australia.

Suppliers of professional services to PIL Australia that are not for resale to our clients, such as suppliers of education and training, consulting and financial services. These suppliers are located in Australia.

Risks of Modern Slavery in our Operations

Operations Risks

In FY2023, PIL Australia continued its operations solely within Australia, where the geographical risk of modern slavery is lower. However, we acknowledge that modern slavery does occur in Australia, particularly affecting vulnerable workers, migrants, and individuals in low-skilled or casualised employment.

PIL Australia also maintains a small percentage of its operations and accounting functions in the Philippines, which poses a high geographic risk of modern slavery, and Malaysia, which carries a moderate risk of modern slavery. While our outsourced operations in the Philippines and Malaysia primarily involve entry-level clerical services and are not identified by the Global Slavery Index as high-risk industries, we remain vigilant regarding the elevated risks associated with this aspect of our operations.

To monitor workplace conditions, PIL Australia conducts biannual visits to the Philippine office on average.

Labour Risks

During this reporting period, PIL Australia continued to engage workers as permanent full-time, part-time and casual employees. Our employees are based in Australia and perform office-based duties. All permanent staff are employed on individual contracts with a Guarantee of Annual Earnings in line with Modern Award requirements. Whilst we do acknowledge that modern slavery can occur in Australia, 100% of our employees are professional skilled workers, which reduces the risks of modern slavery.

Recruitment Risks

In relation to deceptive recruitment practices, we acknowledge that modern slavery risks are prevalent in this area, even in Australia. In FY2023, PIL Australia continued to engage temporary workers through labour hire agencies, but only through agencies who are members of Australian recruitment industry associations such as corporate AHRI and RCSA. Labour hire providers are also required to be licensed in several Australian jurisdictions.

Workers sourced through labour hire agencies are engaged in Australia to perform administrative support duties for PIL Australia. The entitlements for all temporary labour hire appointments are confirmed in writing, regardless of the type of work an individual is engaged to undertake.

All workers sourced through labour hire providers are provided with a copy of PIL Australia's Whistleblower Policy, as well as access to health and safety reporting mechanisms and other training and information as appropriate to perform their role.

PIL Australia uses the services of reputable recruitment agencies on occasion to assist with temporary and permanent appointments, and we are aware of the inherent risks of outsourcing recruitment. The recruitment agencies we engage do not charge recruitment fees to prospective or successful employees. As we only use reputable recruitment agencies, the risk of modern slavery occurring in this element of our operations is low.

PIL Australia consistently integrates a checklist into our recruitment process, serving as a proactive measure to prevent incurring recruitment costs for potential or successful candidates.

Risks of Modern Slavery in our Supply Chain

PIL Australia utilises cleaning, catering, and security services for our Australian offices through contracting arrangements with companies who supply these services. While the workers are located in Australia, PIL Australia acknowledges that these industries are more vulnerable to modern slavery even within Australia. Workers may come from vulnerable groups, such as low-skilled workers and those from migrant, low-income, or culturally and linguistically diverse backgrounds. If not managed properly, this increases the risk of potential modern slavery practises.

PIL Australia uses IT support services for our operations, which are provided by a contracting arrangement company. While the companies we work with are based in Australia, their employees may be located in other countries, posing a geographical risk of modern slavery. PIL Australia has limited visibility into this supply chain, which may be looked into further in future reporting periods.

PIL Australia procures giftware promotional products, office supplies and uniforms which may be manufactured in various locations outside Australia, however they are purchased locally in Australia and from reputable office supplies stores and promotional merchandising suppliers. PIL Australia visibility over this supply chain is limited however noting that supply chains related to uniforms and branded products may have a high risk of modern slavery, these supply chains will need to be investigated further.

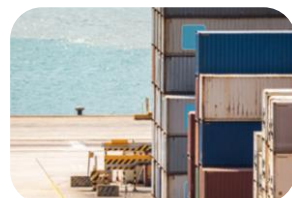
PIL Australia engages the following Australian service providers:



Stevedoring companies to manage loading and unloading of general and containerised cargo



Sea pilots to manage safe passage of our principals' ships



Tug operators to manage towage and marine related services



Seaports as a place to unload or load goods from a vessel



Trucking companies to transport goods from and to ports



Storage and logistics companies for safe storing of goods for its clients

Given that all of PIL Australia's total expenditure within our supply chains is directed to domestic companies, which benefit from robust regulation and business governance, the risk of modern slavery in our tier 1 suppliers is relatively low.

These primary suppliers, engaging directly with PIL Australia, typically operate within industries not identified as at risk for modern slavery within Australia.

In Australia, many workers in maritime transport, including stevedores and port workers, benefit from union membership, enabling collective bargaining for workplace issues and reducing the occurrence of modern slavery in these professions. Additionally, sea pilots, characterized by their professionalism and high skill levels, pose a low risk for modern slavery within our Australian supply chain.

Furthermore, several of our major suppliers in this domain are either reporting entities under the Modern Slavery Act or have publicly issued statements addressing modern slavery, indicating a proactive approach toward combating this issue.

Nonetheless, PIL Australia remains steadfast in its commitment to continually assessing risks within its tier 1 supplier network. By engaging in ongoing evaluation and collaborative efforts with our suppliers, we are dedicated to upholding ethical standards and minimizing the risks of modern slavery across our supply chain.

Our primary focus on offshore processing services providers and key suppliers will continue, as we recognise these supply chains as having the highest potential risk of modern slavery. PIL Australia is confident that through targeted initiatives, we can exert a meaningful influence on these suppliers and drive positive change within the industry.



"Addressing the risks of modern slavery in our supply chain is not just a moral imperative but a strategic necessity. By identifying and mitigating these risks, we not only protect vulnerable workers but also safeguard our reputation, uphold ethical standards, and foster sustainable business practices."

- Chief Financial Officer

Our Actions

"Our team is the cornerstone of our organisation, distinguishing us and uniting us as a cohesive and resilient unit. We are dedicated to fostering a positive, multicultural, safe, and welcoming work environment where every individual is respected and appreciated."

- Chief Human Resource Officer

Policies and Standards

PIL Australia has taken steps to address risks of modern slavery within our business and supply chain through the implementation of policies and procedures. PIL Australia will continue to build on these actions, and any new policies that are implemented will be included in subsequent reporting periods. The most important policies and procedures that we have in place, as well as the steps we have taken to mitigate the risks of modern slavery, are outlined below:

Bullying, Harassment, and Discrimination Policy

PIL Australia is committed to preventing bullying, harassment and discrimination and has implemented policies that reflect the company's commitment to provide a safe and healthy work environment. Workplace bullying and harassment will not be tolerated under any conditions. This policy outlines PIL Australia's commitment to a safe workplace and is intended to ensure, to the greatest extent possible, that employees are not subjected to any form of bullying, harassment, or discrimination while at work. This policy was updated during this reporting period and is tabled for further review in FY24 to ensure continued compliance with the Fair Work Act and its amendments.

Whistleblower Protections Policy

We are committed to promoting a culture of open and honest communication, corporate compliance, and governance. As part of that commitment, PIL Australia has had a Whistleblower Protections Policy in place for a number of years now. This policy serves as a confidential reporting mechanism through which people within and outside our business can register concerns or file reports about any suspected misconduct or an improper state of affairs including unethical, illegal, or other inappropriate conduct. The policy explicitly mentions modern slavery and has been made more accessible to the community and workers of our suppliers (and their suppliers) for the aim of reporting modern slavery risks or concerns directly to PIL Australia so that they can be addressed and resolved. The Policy is available to all employees via our intranet and employee handbook, and to the general public via our [website](#). During the reporting period, we did not receive a Whistleblower report.

Flexibility at Work Policy

To further enhance the work-life balance of our employees and accommodate their personal responsibilities, we are pleased to offer flexible arrangements under our Flexibility at Work Policy to all employees who have completed their training period. This initiative underscores our dedication to enhancing staff retention, promoting well-being, fostering diversity, and advancing our people-first approach. Upholding our established procedures, we diligently review and approve working from home arrangements to ensure a secure work environment for our team members. As part of this process, all employees are required to complete an annual checklist or update it when significant changes occur in their home office setup, ensuring the continuous evaluation of their work environment's safety.

Working Together Policy

The Company respects every employee's right to be treated with dignity, respect, and courtesy. Employees should be able to come to work in an environment that reflects harmony, safety, and security, and that is free of harassment and discrimination, and the Company will make every effort to ensure that this happens.

As part of this commitment, PIL Australia continues to review and update our Working Together Policy to ensure that the Company provides a safe and healthy working environment. The Policy is available to all employees via our intranet and is referenced in our Employee Handbook.

Equal Employment Opportunity (EEO) Policy

The Company is committed to providing equal opportunities for all applicants and employees of the Company, in all areas of employment, and in the terms and conditions of employment, regardless of sex, race, marital status, political or religious beliefs, or other protected characteristic. Company policy requires that Equal Employment Opportunities will be provided in all aspects of employment including recruitment, promotions remuneration and other terms and conditions of employment.

Modern Slavery Policy

At PIL Australia, our Modern Slavery Policy underscores our unwavering commitment to ethical conduct and human rights. Through this policy, we actively identify and mitigate the risks of modern slavery within our supply chains and operations, enforcing stringent due diligence processes to ensure compliance with anti-slavery laws. We prioritise ongoing training for our employees to recognise and respond to signs of modern slavery, fostering a culture of transparency, accountability, and collaboration. The policy is accessible to all via our intranet and website, reflecting our dedication to transparency. Notably, in FY23, PIL Australia received no reports of modern slavery within our operations or supply chains.

Employee Code of Conduct Policy

This year, we are progressing with the development of an employee code of conduct policy. This important document will describe the expected standards of behavior for employees and outline the company's approach to conducting business. By clarifying staff expectations and preventing inappropriate behavior, it aims to eliminate ambiguity. It also fosters a positive ethical culture in which all employees are treated equally and with respect. While a summary of this policy is included in the Employee Handbook, the detailed document has been delayed and will be communicated to both new and existing staff during the reporting period in 2024.

Hours of Work Policy

In the course of this year, we continued to further refine our Hours of Work Policy draft. This policy serves as a comprehensive guide for the provision of fair and equitable working hours, work allocation, and work arrangements, as well as to ensure that Employees are aware of, and able of fulfilling, their responsibilities in relation to their employment with the Company. Currently, we are reviewing the final draft to ensure its alignment with the latest amendments to working hours stipulated in the Fair Work Act. The official release is scheduled for the upcoming reporting period.

Employee Handbook

Our Employee Handbook is a valuable tool for developing, strengthening, and changing our organization's culture, and it reflects our commitment to the promotion and protection of human rights based on the principles of dignity, equality, and mutual respect. Compliant with Australian workplace regulations, it outlines standards, policies, and employee expectations. It also incorporates details on modern slavery and PIL Australia's dedicated efforts to mitigate its risks within our operations and supply chains.

Responsible Recruitment

PIL Australia has continued its practice of engaging recruitment providers and employment agencies predominantly in relation to senior or specialist roles. Engagement of recruitment agencies requires prior approval from the Commercial Director (expense approval) and agency selection and commercial relationship is approved and managed by the Chief Human Resources Officer.

By limiting the use of recruitment agencies to senior, specialist and difficult-to-fill roles that are well remunerated and skilled, this reduces the risk of PIL Australia contributing to modern slavery in its operations through deceptive recruitment practices on the part of recruitment agents. PIL Australia executes an annual salary audit to monitor compliance with employment agreements and ensure all staff are remunerated above the National Minimum Wage or Award Wage (where relevant).

Internship

PIL Australia has established relationships with several Australian tertiary institutions, periodically offering internships to students, and has historically provided work experience to high school students. In these circumstances, students are engaged under the terms and conditions set by their university or the relevant Education department.

Interns who are observing and learning as part of a student or vocational placement are ordinarily not paid, however interns who are undertaking productive work and delivering a commercial benefit are remunerated, consistent with Australia's workplace laws.

During the reporting period, PIL Australia engaged one (1) secondary student through their school's work experience program. The student was provided with an array of observation activities and was supervised by a suitably qualified person at all times. The Department of Education (Victoria) requires work experience students to be paid daily, which PIL Australia fully complied with.

Culture and Pulse surveys

Employee surveys serve as a potent tool for cultivating a positive work environment, refining organisational processes, and ensuring that employees feel acknowledged and valued. They foster a culture of continuous improvement, allowing organisations to adapt to the evolving needs and expectations of their workforce.

In June 2023, a comprehensive staff survey was distributed to all employees in Australia. The primary objectives were to gather feedback on the company's workplace culture, overall employee satisfaction, and to assist PIL Australia in identifying and addressing potential risks such as gender disparity, harassment, coercion, bullying, control, or exploitation within our operations.

The survey results, gauged through average satisfaction and net promoter scores, highlighted an overall positive workplace experience as indicated by the respondents. While affirming the positive aspects, the survey also identified areas for improvement—acknowledging that, like any organisation, there are pockets of individuals or teams whose employment experience could be enhanced due to various local and broader organisational factors. It is noteworthy that the survey responses did not reveal any urgent action items. This proactive approach to feedback underscores PIL Australia's commitment to continuous enhancement, ensuring a workplace that not only meets but exceeds the expectations of its diverse workforce.

Visits To Outsourced Team in The Philippines

This reporting year, representatives from our Australian offices undertook a series of visits to our service providers in Manila, Philippines, fostering engagement through a variety of activities.

These visits included comprehensive training sessions encompassing both general and specific user training, ensuring that our teams are well-equipped with the necessary skills and knowledge. Additionally, our teams received valuable IT assistance to enhance their technological proficiency.

Beyond skill development, we also dedicated time to conduct a thorough review of the working conditions at the Manila offices, prioritising the well-being of the staff. It's worth noting that each aspect examined during these visits surpassed the established standards, reflecting our commitment to maintaining high-quality working environments.

Moving forward, we remain committed to fostering a collaborative and supportive approach, with intentions to conduct visits once to twice annually. This continued engagement emphasises our dedication to nurturing positive relationships, prioritising the well-being of our offshore teams, and upholding excellence in our operational standards.

Due Diligence: Ensuring Ethical Business Practices

Policy Development: Continually striving to uphold PIL Australia's ethical standards and business integrity, we consistently evaluate and refine our internal processes and policies.

Supplier Risk Assessment and Screening: PIL Australia conducts a comprehensive Supplier Risk Assessment, employing a systematic evaluation process to assess and manage potential risks associated with our suppliers. This rigorous assessment aims to identify and understand various risks that could impact our supply chain, business operations, and overall performance. It reflects our steadfast commitment to ethical and sustainable business practices. All suppliers are required to comply with applicable laws and regulations, including the Modern Slavery Act, as well as our policies and standards governing ethical business practices, safety, and environmental concerns.

Contractual Obligations: Before entering into agreements with offshore processing services, PIL Australia conducted thorough financial, human resource, and regulatory due diligence. These agreements explicitly prohibit modern slavery. Additionally, our vendor agreements, both local and overseas, are modified to include specific references to working conditions and concerns regarding modern slavery. New vendors are provided with a form outlining these requirements.

Recruitment Due Diligence Practices: Our recruitment practices prioritise responsibility, encompassing stringent pre-employment checks for all employees, including background checks, employment history verification, and confirmation of work rights. Similarly, we engage reputable labor hire agencies and follow a meticulous process before hiring new staff, ensuring alignment with relevant awards and competitive remuneration rates. Suppliers are obliged to ensure that all their employees and contractors are legally authorized to work, with zero tolerance for any forms of slavery or human trafficking in the products and services provided to PIL Australia.

Training of Staff

Providing modern slavery training to our employees serves several crucial purposes within our organization:

Awareness and Understanding: The training increases awareness among our staff about the existence and complexities of modern slavery. It ensures that employees understand the various forms of exploitation, contributing to a more informed and vigilant workforce.

Human Rights Education: The training helps educate employees on human rights principles, emphasizing the importance of respecting and protecting the rights of individuals. This knowledge is fundamental in fostering a workplace culture that upholds ethical standards.

Risk Mitigation: By educating our staff about modern slavery risks, we empower them to identify and address potential issues within our operations and supply chain. This proactive approach contributes to risk mitigation and aligns with our commitment to responsible business practices.

Organisational Culture: Providing modern slavery training helps shape a corporate culture that prioritises ethical considerations. It sends a clear message that we are dedicated to creating a workplace environment that values human rights and actively opposes any form of exploitation.

New Hire Integration: Incorporating the training into the induction and probation period for new hires ensures that ethical standards are communicated from the beginning of their tenure. This helps in embedding responsible practices within the organisational culture.

Overall, modern slavery training is a proactive measure to equip our workforce with the knowledge and tools needed to contribute to the prevention of modern slavery, aligning with our broader commitment to ethical business conduct.

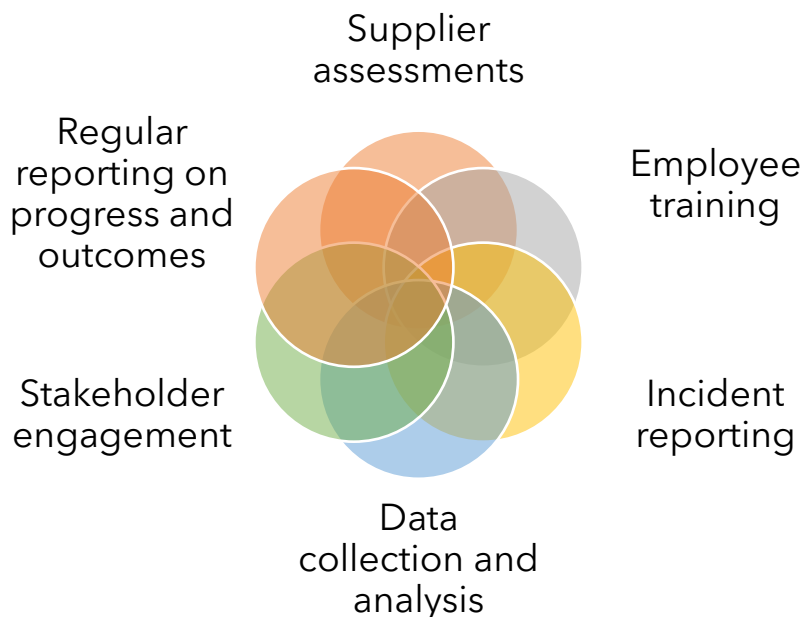


To ensure that 100% of employees undergo modern slavery training at the time of their induction.

Monitoring and Reporting

Our efforts to prevent modern slavery continue, with the working group meeting on a regular basis throughout the reporting period. The initiative is still fully supported by the policy owners, finance team, Risk & Compliance Manager, Chief Human Resource Officer, and Chief Financial Officer.

PIL Australia has defined a framework that includes metrics that will allow the Company to track the effectiveness of its due diligence actions and report on our impact during the reporting period. Furthermore, modern slavery reporting is included as a standing agenda item at every board and executive meeting.





Assessing the Effectiveness of our Actions

PIL Australia is fully committed to upholding the Modern Slavery Act to combat modern slavery. We acknowledge the challenges associated with measuring the effectiveness of our actions, however we are fully committed to continuous improvement. The approach that we use to assess the effectiveness of our actions is shown in the table below.

Governance Framework

- Annual review of our People and Safety policies.
- A maturity assessment of our policies, systems, and controls, as well as our grievance mechanisms and remediation processes.
- Completion rates for awareness training.

Risk Management

- Risk-based approach to assessing the risks of modern slavery by reviewing our business operations, procurement practises, and Tier 1 Suppliers, considering geographical location, nature of goods and services supplied, and annual spend level;
- Total number of suppliers who have incorporated anti-modern slavery practises into their operations;
- Analysis of responses to supplier questionnaires;
- Analysis of responses to our Culture and Pulse Survey;
- Consultation with experts in the field to understand our obligations;
- Implement strategies to assess and address risks of modern slavery and assess the effectiveness of our actions.

Grievance Mechanisms

- Regular reporting on the total number of issues raised and resolved.

Monitoring and Reporting

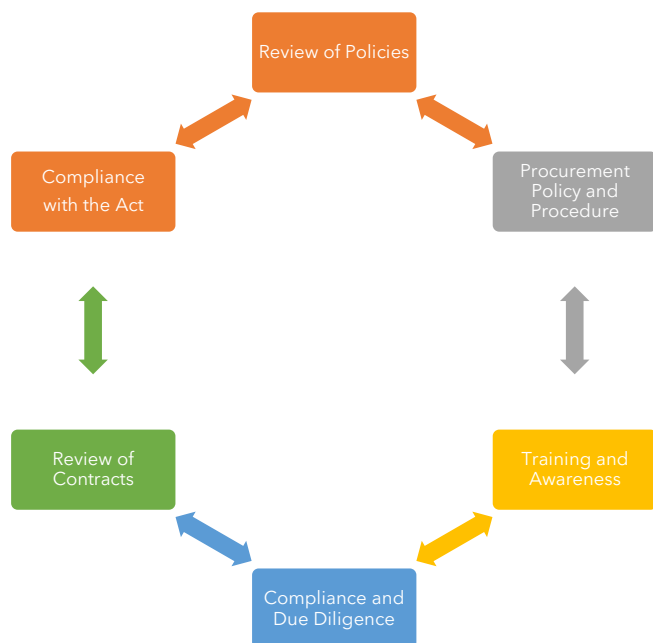
- Regular reporting on the total number of sites visits (strategic partners, offshore business services, key suppliers);
- Quarterly reporting to the Executive Team and semi-annual reporting to the Board of Directors;

Continuous Improvement

PIL Australia is committed to continually improving our approach to reducing the risk of modern slavery practices in our supply chains and operations and has established the following priorities for FY24:

- Continue to review our existing Policy Framework.
- Continue working on our Procurement Policy and Procedure and Code of Conduct for Suppliers Policy and look at implementing it in FY2024. Implementation of procurement procedure will include supplier risk assessment and surveys, development of preferred supplier list.
- Continue to deliver the developed modern slavery training to all our staff to increase their understanding and awareness.
- Continue to conduct employee pulse survey to all employees.
- Ensure that all new medium and high-risk suppliers undergo PIL Australia's Supplier Risk Evaluation Process.
- Continue process of transitioning existing vendors to new vendor agreement.
- Publish Modern Slavery Statement by 30th of June each year outlining the steps we have taken to address modern slavery risks.

Progress is not just about where we stand today, but how far we're willing to push the boundaries of change tomorrow.



Consultative Approach to Modern Slavery Statement

Our Modern Slavery Working Group, consisting of representatives from Finance, Human Resources, Procurement, and Risk & Compliance, plays a pivotal role in shaping our Modern Slavery Statement. Through collaborative efforts, this team ensures a comprehensive understanding of modern slavery risks and facilitates the development of robust mitigation strategies.

In addition to internal consultations, PIL Australia seeks input from external consultants, who provide expertise in modern slavery legislation. This collaboration enables PIL Australia to fulfill their reporting obligations under the Australian Modern Slavery Act efficiently and effectively.

Furthermore, members of PIL Australia's executive leadership team meticulously review our Modern Slavery Statement before its submission for Board approval.

As we do not own or control any other entities, criterion six is not applicable to PIL Australia.



Governing Body Approval

This statement, pursuant to the Australian Modern Slavery Act 2008, was approved by the Board of PIL Australia Pty Ltd, acting as the principal governing body, on 12 June 2024. It constitutes the statement for the year ended 31 December 2023. The statement was signed on behalf of the Board of Directors by the Managing Director, Andrew Maguire.

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