



Modern Slavery Statement

December 2021



Introduction

This statement has been made by Fleets Flyers Pty Limited ABN 41 008 417 016 and Fleet Street Express Pty Limited ABN 95 081 243 165, trading as ANC, in accordance with the [Modern Slavery Act 2018 \(cth\)](#). This is our first annual statement regarding modern slavery to fulfil our obligations in respect to the Modern Slavery Act 2018 (cth).

Overview of modern slavery

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour

Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. 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 business 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. Taking action to combat modern slavery also makes good business sense. Entities that take action to combat modern slavery in their operations and supply chains can protect against possible business harm and improve the integrity and quality of their supply chains.

Outline of the Act

This Act requires entities based, or operating, in Australia, which have an annual consolidated revenue of more than \$100 million, to report annually on the risks of modern slavery in their operations and supply chains, and actions to address those risks. Other entities based, or operating, in Australia may report voluntarily.

The Commonwealth is required to report on behalf of non-corporate Commonwealth entities, and the reporting requirements also apply to Commonwealth corporate entities and companies with an annual consolidated revenue of more than \$100 million.

Reports are kept by the Minister in a public repository known as the Modern Slavery Statements Register. Statements on the register may be accessed by the public, free of charge, on the internet.

ANC's commitment to preventing modern slavery

Preventing modern slavery occurring within ANC is key to our commitment to social responsibility and sustainability. In accordance with the Modern Slavery Act 2018 (cth) ANC is committed to upholding the protection of human rights. We are committed to ensuring that we are not complicit in any human rights violations and hold our suppliers and partners to this same exacting standard.

This statement outlines the steps that ANC has taken, and will continue to take, to assess and reduce risks of modern slavery within our business and throughout our supply chain.

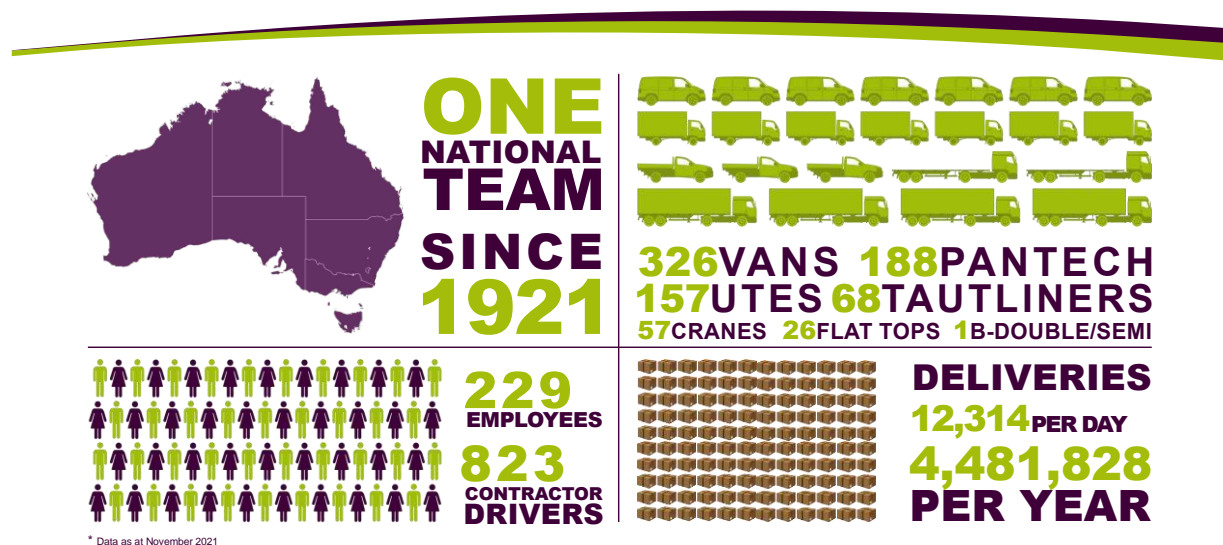
About ANC

ANC is the last mile delivery partner for many of Australia's leading brands.

ANC is a privately-owned Australian company with a team of 1,000+ delivery professionals including contractors and employees across Australia and the Philippines. This includes a fleet of 800+ commercial vehicles servicing metropolitan Australia with utes, vans, Pantechs, tautliners, crane trucks, flat tops, semi's and electric vehicles making 12,000 deliveries a day, 7-days a week.

Zero emission vehicles are a growing priority in our accelerated shift to sustainable delivery, expanding our 'first to market' fleet of electric vehicles in 2018. We believe there is a commercial and social advantage in leading 'at scale', the transition to zero emission vehicles. The significant social advantage includes benefits to the environment (saving an estimated 36 metric tonnes of CO² emissions annually, per vehicle), the driver's day-to-day work experience (less noise, heat, vibrations), and the customers last mile delivery experience (less noise and emissions).

We are a leader in diversified delivery services in hardware/building, furniture, white goods, electrical, eCommerce, click & delivery, medical and corporate. Our culture of proactive continuous improvement with our service to safely deliver goods including integrated assembly and installations create extraordinary delivery experience as demonstrated in our world-class NPS results of 68 in 2021.



Technology is integral to our strategic service and innovative solutions, ensuring visibility, safety, and security on every delivery.

Our core values of safety, honesty, loyalty, care, and respect are the foundation on which we operate, engage, and serve our team, clients and customers. These values have earned us a reputation of trust and integrity.

ANC is committed to maintaining this reputation among clients, customers, business contacts, competitors, and the community. We must all set a good example and conduct ourselves in a way that demonstrates the highest ethical standards as we go about our work, on and off the road.

In 2021 ANC celebrated 100 years of delivering.

SAFETY



RESPECT



HONESTY



LOYALTY

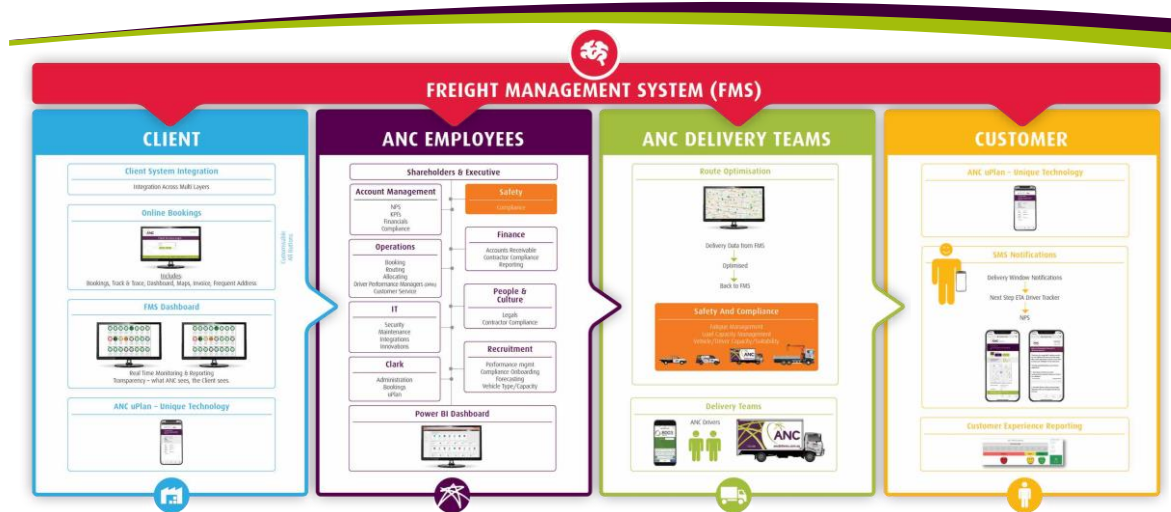


CARE



Our Operations

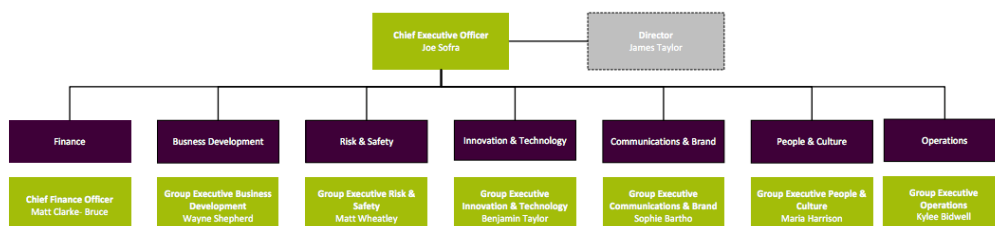
ANC's supply chain involves working with a number of large Australian and global clients providing professional last mile delivery services into homes, offices and worksites including construction, corporate, medical and education. As part of our integrated delivery service, we provide 'complex deliveries' such as installation, assembly and removal of old comparable goods. Our supply chain relies on a team of contractor owner drivers to safely complete the delivery services.



Our organisational structure consists of a Board of Directors, an executive leadership team, 200+ employees distributed nationally within Australia and 1000+ independent contractors including drivers and offsideers. Some of our contractor owner drivers have their own employees as well. On occasion, we engage contractors through what we call Outside Hire organisations (Contingent Labour supply).

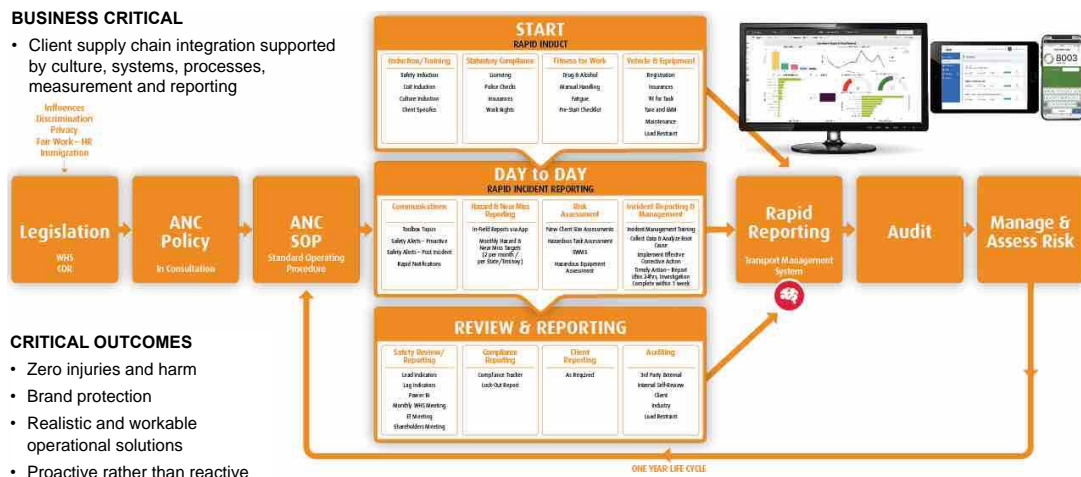
We also engage a relatively small team of personnel through a third-party, Business Process Outsourcing (BPO) organisation in the Philippines, who perform customer service activities on behalf of ANC.

Our Executive Leadership Team (see below) consists of our Chief Executive Office and Group Executives in Finance, Business Development, Risk & Safety, Innovation & Technology, Communications & Brand, People & Culture and Operations.



We are nationally dispersed and have offices in New South Wales, Queensland, Victoria, South Australia, Western Australia, and the Australian Capital Territory.

According to the Global Slavery Index (2018), cases of forced labour exploitation in Australia predominantly occur in industries considered at risk, including agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food services. Whilst ANC's main suppliers do not fall into these areas identified as high risk, we understand that there is still a possibility of modern slavery occurring.



Our supply chain relies on integration and collaboration to ensure safe and seamless delivery outcomes. Throughout our supply chain ANC is committed to assessing and reducing all risks of modern slavery within our business and throughout our supply chain.

Reporting Entities & Consultation

This statement is in accordance with the Modern Slavery Act 2018 (*cth*) and has been prepared in consultation with the following entities:

- Black Diamond Administration Services Pty Ltd
- Yellow Diamond Administration Services Pty Ltd
- Fleets Flyers Pty Ltd
- Courier Metro Services Pty Ltd
- Contract Logistic Services Pty Ltd
- B2C Delivers Pty Ltd
- Courier National Services Pty Ltd
- Courier Contract Services Pty Ltd
- SDNT Pty Ltd

Corporate Governance

At ANC we are underpinned by our core values of Safety, Respect, Honesty, Loyalty, and Care and everything we do is measured against these important guides. We have a number of policies that outline the ethical standards in which all employees, contractors and our clients are expected to operate.

1. ANC Modern Slavery Policy
2. ANC Human Rights Policy
3. ANC Code of Ethics Policy

4. ANC Young Worker Employment Procedure
5. Suspected Child Labour Violation Procedure and Handling Routine
6. ANC Whistleblowing Policy
7. Independent Contractor Code of Conduct
8. Anti-Discrimination, Harassment and Bullying Policy

ANC is committed to the highest standards of conduct and ethical behaviour in all our business activities, and we promote and support a culture of honest and ethical behaviour, corporate compliance, and good corporate governance.

Steps we have undertaken in our commitment to modern Slavery

- a) We established an initial ANC Modern Slavery Working Group with a focus on identifying and mitigating risks of modern slavery within ANC's operations and throughout our supply chain for the preparation of this document
- b) We implemented the *ANC Modern Slavery Policy* endorsed by the Executive Leadership Team (ELT)
- c) One area of our supply chain that we identified to be of higher risk is within our third-party labour arrangements, such as Outside Hire and employees of contractors. With regards to our contractors that directly engage their own employees, we maintain the *ANC Young Worker Employment Procedure* for any workers under the age of 18 years old. Young workers are considered 'vulnerable' workers, and may pose a higher risk, therefore this procedure ensures that young workers understand the following;
 - They must be paid in accordance with the relevant award
 - They must be provided with suitable working conditions
 - They are aware of ANC's policies and procedures
 - They are aware of the minimum entitlements under the relevant award such as penalties, and leave entitlements

Young Workers are also assigned with a key contact within the business should they have any questions relating to their pay, entitlements or working conditions
- d) We also maintain a *Suspected Child Labour Violation Procedure and Handling Routine* to outline the complaints handling process should we receive a complaint in relation to the *ANC Young Worker Employment Procedure*
- e) We reviewed our *Independent Contractor Agreements* to include acknowledgement of the requirement to comply with the modern slavery legislation
- f) We instituted a reporting process for breaches of modern slavery utilising the *ANC Whistleblowing Policy*.

Our continued commitment to modern slavery

- a) ANC will continue to review our broader company policies to ensure that they align with the Modern Slavery Act 2018 (*cth*)
- b) We will continue to educate our people, in office and in field, to ensure that they are equipped with the knowledge and understanding of what constitutes modern slavery and the reporting process of any suspected breaches of the *ANC Modern Slavery Policy*
- c) We will review our existing supply chain to ensure our suppliers are aware and aligned to our commitment against modern slavery globally
- d) We will introduce appropriate steps to confirm awareness and alignment of new suppliers to our commitment against modern slavery globally.
- e) We will present progress on actions and outcomes to the Executive Leadership Team for review at least annually, with updates provided in subsequent Modern Slavery Statements.

Reporting unlawful and unethical conduct

Reports of unlawful conduct are responded to in accordance with the *ANC Whistle-blower Policy*. To receive protection of any disclosure under this Policy an Eligible Person must make their disclosure to a Disclosing Officer. A discloser may also elect to make a report anonymously. ANC will respect the discloser's right to not identify themselves.

ANC encourages the disclosure of any instances of suspected unethical, illegal, fraudulent, or undesirable conduct involving ANC's business, and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage, or reprisal.

This Modern Slavery Statement is made by ANC for the financial year ending 30 June 2021 and has been approved by the Board of Directors.



Joe Sofra

22 December 2021

Chief Executive Officer

Date



James Taylor

22 December 2021

Director

Date