



Lineage Modern Slavery Statement

by Lineage AP Holdings Pty Ltd for FY21

1 Introduction

This statement has been prepared by Lineage AP Holdings Pty Ltd (ABN 27 637 083 544) (**Lineage AP**) on behalf of itself and its subsidiaries that are Reporting Entities pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**), as listed in Annexure A. This statement covers the modern slavery risks of the Reporting Entities and those Reporting Entities' owned or controlled entities (which are located in Australia, Vietnam and Sri Lanka) for the period from 1 January 2021 to 31 December 2021. When this statement refers to "Lineage", "we", "us" or "our" it is a reference to Lineage AP and its owned or controlled entities.

Lineage AP has its head office and registered address at 100-130 Abbots Road, Dandenong South Victoria 3164. Its subsidiaries have operations in Australia, Sri Lanka, and Vietnam as a result of its acquisition of the Emergent Cold business in June 2020. Lineage AP is a wholly owned subsidiary of Lineage Logistics Holdings, LLC, a global cold storage and logistics services company that operates in North America, Europe, and the Asia Pacific region (**AsiaPac**), (together **Lineage Group**).

Modern Slavery as defined under the Act comprises serious crimes including (but not limited to) forced labour, debt bondage, forced marriage, slavery, human trafficking, and the worst forms of child labour. The Global Slavery Index estimates that of the 40 million people living in Modern Slavery conditions worldwide, around 24.9 million of those people are based in the AsiaPac region.

Lineage is committed to evolving our practices to combat slavery and human trafficking and to taking steps to reduce the risk of Modern Slavery in our supply chains and operations in AsiaPac and globally.

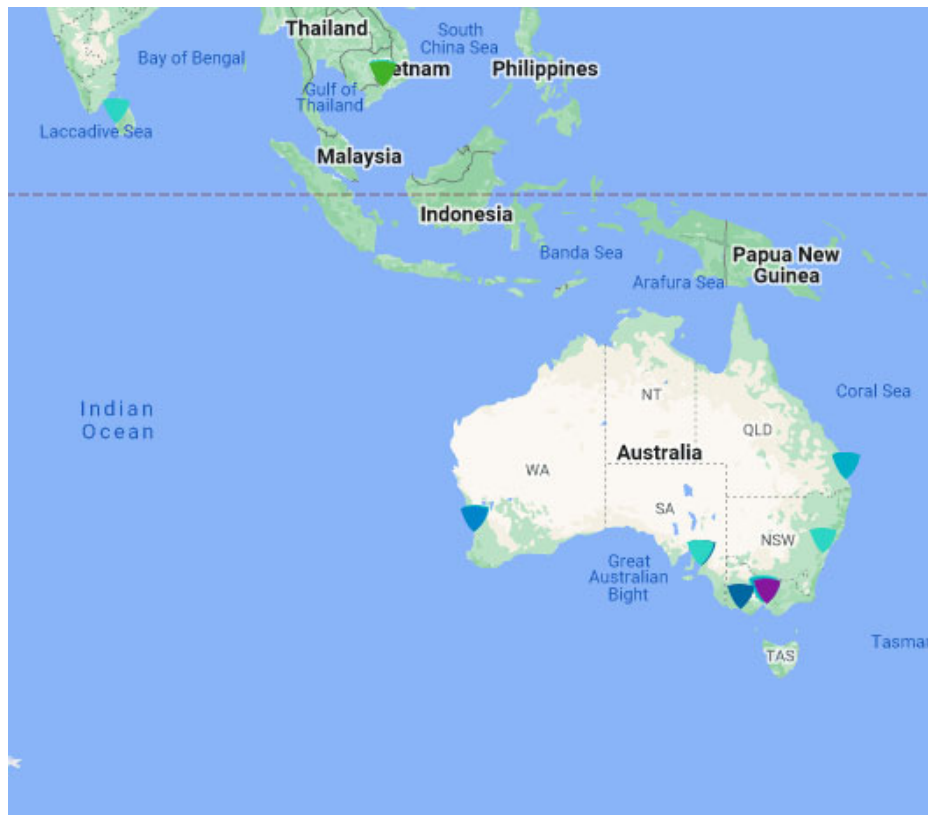
2 Structure, Operations and Supply Chain

Lineage provides warehouse storage, handling, and transportation services to customers in all sectors of the marketplace including export. It acknowledges that its core business as a cold storage and logistics company has the potential to cause, contribute to or be linked to Modern Slavery via its operations and supply chains.

As noted above, Lineage operates within Australia, Sri Lanka, and Vietnam. Key operations include food storage, transport, processing, packaging and distribution, and the maintenance of office headquarters.

- Our Australian operations have approximately 1250 suppliers, our Vietnam operations have approximately 344 suppliers and our Sri Lanka operations have approximately 125 suppliers.
- The most significant suppliers to Lineage are within the following industries and are domiciled in Australia, Sri Lanka and Vietnam (Lineage uses predominantly local suppliers):
 - Utilities
 - Insurance
 - Transportation
 - Construction
 - Food and food products
 - Facilities
- Lineage employs around 894 people in Australia, 439 people in Vietnam and 70 people in Sri Lanka. Our employees work in a wide range of roles including the following key areas and roles:
 - Administration
 - Warehouse Operations and Management
 - Legal
 - Human Resources
 - Finance, Commerce and Accounting
 - IT
 - Quality, Health, Safety and Environment
 - Customer Service
 - Checkers and General Hands
 - Managerial and Executive
 - Engineering and Construction
- In addition, Lineage engages labour hire services to support its operations, including around 200 people in Australia, around 34 people in Vietnam and around 42 in Sri Lanka. Our labour hire workers perform operational and administrative roles and manage warehouse operations, including working as pickers, packers and forklift operators.
- Some of our warehouse workers are our lowest paid workers, however they are paid at, or above, the minimum wage.

The map that follows shows our locations.



- ▲ Active Construction
- ▲ Automated Warehouse
- ▲ D2C Fulfillment
- ▲ Dedicated or Leased Warehouse
- ▲ Freight Forwarding
- ▲ Headquarters
- ▲ Port Location
- ▲ Public Warehouse
- ▲ Regional Distribution Center
- ▲ Regional Office

Similar operations exist across Europe, New Zealand and the USA, operated by Lineage’s parent company, and its related entities.

Lineage Group has adopted six values, which are intended to guide how all members of the group of companies conduct business and are key to helping us achieve our vision to be the most dynamic temperature-controlled logistics company in the world. These six values are outlined further below.

<p>SAFE</p> <p><i>We should all return home free of injury every day</i></p>	<p>TRUST</p> <p><i>We all play a position that is key to the company’s success</i></p>	<p>BOLD</p> <p><i>We take informed risks, and make tough decisions</i></p>
<h1 style="margin: 0;">OUR VALUES</h1>		
<p>RESPECT</p> <p><i>We put our shared interests ahead of any individual or team</i></p>	<p>INNOVATION</p> <p><i>We welcome challenges and seek to solve them creatively and without boundaries</i></p>	<p>SERVANT LEADERSHIP</p> <p><i>We are positive and focus on meeting the needs of those we support</i></p>

SAFE

- We implement and enforce safe work standards and best practices.
- We are responsible for our safety and the safety of others.
- We are committed to every Team Member returning home safely each day.

INNOVATION

- We understand that the needs and priorities of the customer come first.
- We will always look forward and plan for tomorrow.
- We welcome challenges and seek to solve them creatively and without boundaries.

TRUST

- We understand that each Team Member plays a position that is key to our success.
- We have integrity, following through on our commitments and delivering exceptional results.
- We expect and foster a fear-free work environment for all employees.

BOLD

- We seek understanding and clarity when the path forward is unclear.
- We embrace change and the challenges that come with it.
- We challenge norms, take informed risks, and make tough decisions.

RESPECT

- We put our shared interests ahead of any individual or team.
- We believe communication is key to ensuring an honest and positive experience.
- We act and treat each other with humility.

SERVANT LEADERSHIP

- We are positive and focus on meeting the needs of those we support.
- We actively coach and develop team members.
- We celebrate wins and recognize the success of both teams and individuals.

3 Risks of Modern Slavery practices within operations and supply chains

Operations

We consider that the risk of modern slavery in our operations is low. We pay all our staff at, or above, minimum wage. We also check that each employee is entitled to work in the jurisdiction and is of legal working age. Employees are paid for overtime and controls exist to ensure that staff are only undertaking reasonable overtime. All staff are provided with appropriate personal protective equipment, depending upon their role.

Supply chain and customer risk

Lineage's potential exposures to Modern Slavery run up and down its value chain. Modern Slavery risks lie both in its supplier relationships, but potentially also in its customer relationships as Lineage does not typically prepare or own the goods it stores and transports and has limited control as to the origin of the goods it stores and moves.

Lineage has identified a number of inherent exposure points within its operations and supply chain regarding Modern Slavery risks:

- **Food products:** we do not typically procure the food products that we pick, pack, store and deliver. The Global Slavery Index identifies fish (including deep sea fishing and seafood preparation) as the third highest product at risk of Modern Slavery imported into the G20 region, particularly by way of forced labour and debt bondage. Lineage moves and stores food products, including seafood and rice, which may be connected to Modern Slavery in these regions.
- **Land transport and international shipping:** we are aware of inherent risk of modern slavery in shipping. The shipping companies that deliver the products that we pick, pack, store and deliver are engaged by our customers and we are not involved in supplier selection and management. Different subsidiaries of Lineage have different arrangements with land transport drivers. While some employ drivers directly, others engage with drivers as contractors. The Global Slavery Index reports that the transportation industry is vulnerable to human trafficking in many countries, particularly along regional arterial corridors.
- **Invisible workforce:** cleaning, janitorial, construction and IT services are industries that form part of the invisible workforce of Lineage. The Global Slavery Index identifies laptops, computers, and mobile phones as the number one product at risk of Modern Slavery imported into the G20. Even though Lineage procures many of these services through contractors and other third parties, often with limited control over these supply chains, Lineage acknowledges that any suspected Modern Slavery practices by contractors or via procurement of IT goods still falls within Lineage's supply chain.
- **Geographic risk:** we accept that, where our operations exist in jurisdictions of higher risk for modern slavery, that increases the inherent risk that suppliers domiciled in those jurisdictions cause, contribute or are directly linked to modern slavery.

Lineage also acknowledges that there is also inherent risk in using labour hire services. This is because labour hire arrangements involve reduced visibility over the treatment of workers. In Australia, each of our labour hire providers need to hold a Labour Hire Licencing Check where it is available in the State of operation (Vic, SA, Qld).

4 Actions taken to manage the risk of modern slavery

Code of Conduct

We have a Code of Conduct containing requirements and policies that apply to all officers, directors and employees. The Code of Conduct outlines minimum standards regarding Modern Slavery and establishes expectations and ethical standards. The Code of Conduct also addresses Modern Slavery through a commitment to the ILO Declaration on Fundamental Principles and Rights to Work. We also train employees in the Code during induction.

Policies

Lineage Group also has a broad suite of global policies that set standards and expectations for employees, with focus on the rule of law and compliance, including:

- Human Rights Policy
- Equal Employment Opportunity Policy
- Whistleblower Policy and Guidelines
- Grievance Procedure Guidelines

Employees and labour hire workers

- Employee safety is critical to our business. This includes the provision of special protective equipment designed to protect workers from the sub-zero temperatures of some of our facilities.
- There is a requirement throughout all of the relevant entities that staff must have the right to work in the jurisdiction, based on their birth certificate, passport, citizenship or visa documents, and be of legal working age.
- We require all employees to show documentation evidencing they are of legal working age in the jurisdictions in which we operate.
- All Lineage's workers, including its lowest paid workers, are paid at, or above, the minimum wage and controls are in place to limit overtime.
- In Australia, our employees are entitled to have a ten hour break in between their shifts.
- We also have an Employee Assistance Program that can be accessed by all employees, and active unions in Australia and Vietnam can be accessed by all Lineage workers.
- Our Australian labour hire companies across Victoria, South Australia and Queensland must hold a valid labour hire licence issued by the Labour Hire Authority for each State.

5 Effectiveness of actions taken

The day-to-day management of our modern slavery risk management program is managed by representatives from Operations, HR, Legal, Safety and Compliance and IT. The Lineage AP Board of Directors is ultimately responsible for this statement and assessing the effectiveness of our modern slavery risk management program.

Assistance from third party human rights experts

During 2020-2021, Lineage obtained specialised assistance from a third-party human rights expert to obtain a baseline understanding of Modern Slavery risks within its supply chain. Lineage will continue to explore further ways to assess, address and reduce the risks of Modern Slavery within our business.

Having received the baseline Modern Slavery report in June 2021, Lineage is now in the process of undertaking the following steps across its business and entities at a local and global

level, which it intends to deliver in 2022:

- Strengthening our existing Code of Conduct, Human Rights Policy, Supplier Code of Conduct, Whistleblower Policy and other standards relevant to Lineage's business.
- Conducting a review of standard supplier contract clauses globally to ensure a harmonious approach is being taken to reducing Modern Slavery practices within Lineage's operations and supply chains.
- Introduction of a global review process for suppliers (Sedex), and open discussions on what procedures or actions are being taken to identify and manage Modern Slavery risks. We will use Sedex to assist us to assess supplier risk and the impact of our actions to manage the risk of modern slavery in our supply chain.

Lineage acknowledges the need to integrate each Policy and action taken at a cultural level to ensure that all policies and updated commitments reinforce an ethical culture and environment that combats and maintains zero tolerance to Modern Slavery in its business operations and supply chains.

Complaints and grievance mechanism

Lineage has a Grievance Procedure and Whistleblower Policy to facilitate and protect the bringing of issues to our attention which are available on our Intranet. We have appointed Lighthouse to operate an independent Whistleblower service, which is available globally in multiple languages. Whistleblower reports can be anonymous. A protected disclosure officer has been appointed to ensure that whistleblowers are protected from victimisation.

We pledge to appropriately investigate any report. We also pledge that we will not retaliate against anyone for making a good faith report.

6 Consultation with subsidiaries

As part of our baseline Modern Slavery review and risk assessment delivered in 2021, Lineage AP consulted with its subsidiaries in relation to reporting under the Act via meetings and email communication to discuss a coordinated response to, and assessment of, its Modern Slavery obligations under the Act. A draft of this report was provided to each of the owned or controlled entities of Lineage AP as part of the preparation of this statement.

7 COVID-19

Lineage acknowledges that the World Bank has estimated that an additional 88 to 115 million people were pushed into conditions of extreme poverty due to COVID-19. Lineage's response to COVID-19 included various safety protocols such as mandatory mask wearing, physical distancing and shift breaks to minimise physical contact as well as tracking activities and sanitisation processes. We abide by all Government advice in the regions we operate in about the changing COVID-19 protocols. Across Australia, Vietnam and Sri Lanka, our employees were supported throughout the pandemic. Some were provided 14 days of paid COVID-19 leave, allowances and cash support to assist with effects of sickness and stresses of COVID-19 on individuals and in families. In Sri Lanka and Vietnam, suppliers were provided with more flexibility of delivery timeframes during lockdown periods. Audits of suppliers were unaffected by the pandemic in Vietnam as Lineage has put in place online audit mechanisms.

8 Our future

This statement is a result of consultation and collaboration between many areas within Lineage, including Procurement, Operations, Human Resources, Legal, Safety and Compliance and IT and builds on our intention to continuously develop our understanding and management of Modern Slavery risks in our operations and supply chains. The individuals consulted have responsibility for their functions within Lineage, including the reporting entities listed in Annexure A and their owned or controlled entities. Accordingly, all of the Lineage reporting entities and their owned or controlled entities were consulted in the preparation of this statement.

We are committed to responsible sourcing as a fundamental part of our commitment to maintaining the integrity of the food supply chain. Lineage is also committed to helping eradicate the worst forms of child labour, forced labour, slave labour and other human rights impacts in our supply chains.

Approved by:

This statement was approved by the board of Lineage AP Holdings Pty Ltd as the parent reporting entity, on 29 June 2022 on its behalf and its subsidiaries, which are also Reporting Entities, as listed in Annexure A.



Jeff Hogarth
President, Asia Pacific 29 June 2022

Annexure A - Reporting Entities

Lineage AP Holdings Pty Ltd (ABN 27 637 083 544)

Lineage AP Intermediate Holdings Pty Ltd (ABN 33 637 084 381)

Emergent Cold Topco Pty Ltd (ABN 80 622 089 909)

Emergent Cold Midco Pty Ltd (ABN 59 622 098 293)

Emergent Cold Bidco Pty Ltd (ABN 24 622 102 041)

Emergent Cold Holdings Pty Ltd (ABN 88 000 106 141)

Emergent Cold Pty Ltd (ABN 14 059 512 159)

Lineage AUS TRS Pty Ltd (ABN 57 640 590 147)

Annexure B: Reporting Criteria

Reporting Criterion	Page
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	1 – 4 Annexure A
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	4-5
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	6
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	6 -7
6. Describe the process of consultation with any entities the reporting entity owns or controls	7
7. Any other relevant information	7-8